

Consolidated Plan  
5 Year Strategy  
(July 1, 2019 through June 30, 2024)  
And  
Program Year 2019  
Annual Action Plan  
(July 1, 2019 through June 30, 2020)

For Housing and Community Development

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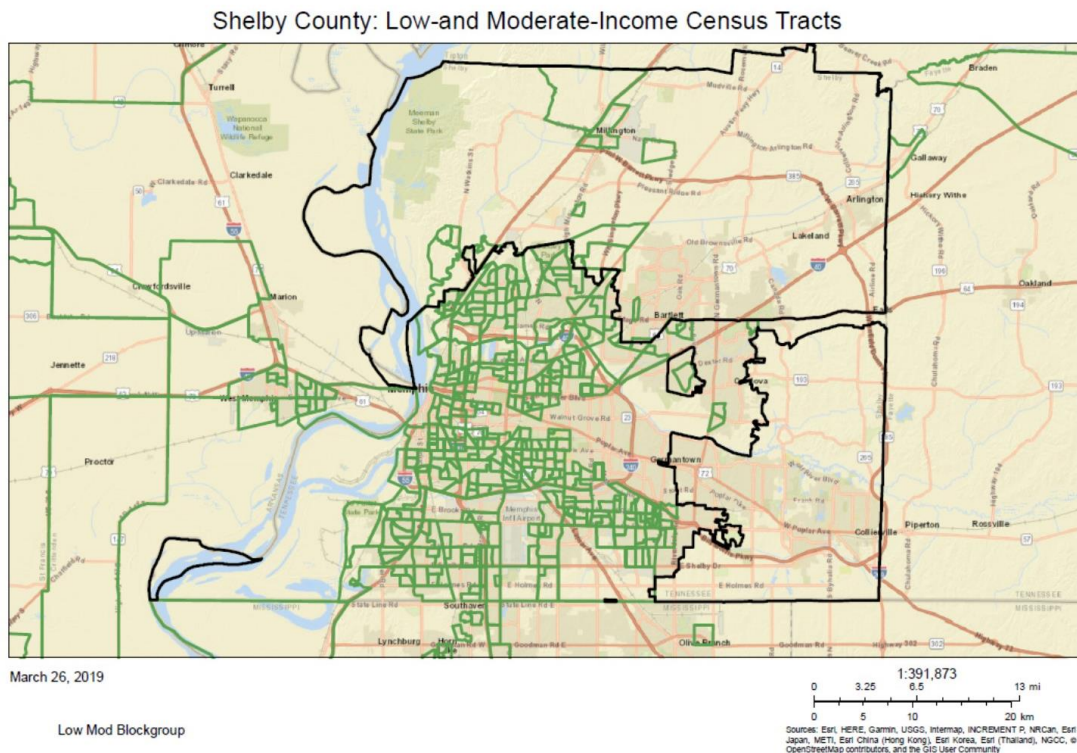
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# Executive Summary

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

### 1. Introduction

This document outlines the 5 Year Strategy for the use of federal funds granted to Shelby County by the U.S. Department of Housing and Urban Development (HUD) under the Community Development Block Grant (CDBG) and Home Investment Partnership (HOME) programs. This Strategy covers the period from July 1, 2019 through June 30, 2024 and includes five HUD program years. Activities associated with the use of these funds are designated for the Shelby County Urban Entitlement Area including the municipalities of Arlington, Bartlett, Collierville, Germantown, Lakeland, and Millington as well as unincorporated areas of Shelby County. Programs and activities described in this plan are intended to primarily benefit low- and moderate-income residents of the Shelby County Urban Entitlement Area including areas with concentrations of low- and moderate-income residents. Shelby County will also use this plan as a basis for coordination with other federal, state, and local programs and initiatives. The Shelby County Urban Entitlement Area is a diverse community composed of a mixture of suburban and rural development. The map below depicts the Shelby County Urban County Entitlement Area (outlined in bold black lines) as well as low- and moderate income census tracts in Shelby County.



**Shelby County: Low- and Moderate-Income Census Tracts**

## 2. Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview

High priority needs identified in the 5 Year Strategy planning process are listed in the table below. This 5 Year Strategy establishes four goals to guide the use of CDBG and HOME funds from July 1, 2019 through June 30, 2024 in order to address high priority needs identified in the 5 year Strategy. These four goals are described and summarized below in a table.

Priority Needs Summary				
Name	Population	Geographic Areas	Priority Level	Associated Goals
Housing Rehabilitation & Minor Home Repair	Large Families	Shelby County Urban County Entitlement Area-Other	High	Preserve Housing Affordability
	Moderate	Shelby County, Tennessee-Other		
	Persons with Mental Disabilities			
	Frail Elderly			
	Elderly			
	Elderly			
	Extremely Low			
	Persons with Physical Disabilities			
	Families with Children			
Low				
Parks & Recreational Facilities	Non-housing Community Development	Shelby County Urban County Entitlement Area-Other	High	Improve and Construct Public Facilities
Public Services	Frail Elderly	Shelby County Urban County Entitlement Area-Other	High	Provide Public Services
	Elderly			
	Moderate			
	Elderly			
	Extremely Low			
	Non-housing Community Development			
Low				
Public Facilities Improvements	Non-housing Community Development	Shelby County Urban County Entitlement Area-Other	High	Improve and Construct Public Facilities
Affordable Housing	Moderate	Shelby County Urban County Entitlement Area-Other	High	Preserve Housing Affordability
	Large Families			Create Opportunities for Affordable Housing Choice
	Elderly			
	Families with Children			
	Extremely Low			
	Low			

**Goals Summary**

Goal	Category	Geographic Area	Needs Addressed	Funding	
<b>Preserve Housing Affordability</b>	Affordable Housing Non-Homeless Special Needs	Shelby County Urban County Entitlement Area Shelby County, Tennessee	Housing Rehabilitation & Minor Home Repair Affordable Housing	CDBG :	\$508,945
				HOME :	\$1,914,640
	Start Year: 2019	End Year: 2023	Outcome:	Objective:	
			Availability/accessibility	Provide decent affordable housing	
	Description: Preserve existing housing to maintain the supply of existing affordable housing. Outcomes include availability/accessibility as well as affordability.				
Goal Outcome Indicator	Quantity		UoM		
Homeowner Housing Rehabilitated	70		Household Housing Unit		
<b>Improve and Construct Public Facilities</b>	Non-Housing Community Development	Shelby County Urban County Entitlement Area	Parks & Recreational Facilities Public Facilities Improvements	CDBG :	\$3,000,000
				HOME :	\$0
	Start Year: 2019	End Year: 2023	Outcome:	Objective:	
			Sustainability	Create suitable living environments	
	Description: Assist local municipalities and Shelby County Government in providing safe, aesthetically pleasing, and functional communities for their residents.				
Goal Outcome Indicator	Quantity		UoM		
Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	1,000		Households Assisted		
<b>Provide Public Services</b>	Non-Homeless Special Needs	Shelby County Urban County Entitlement Area	Public Services	CDBG :	\$370,000
				HOME :	\$0
	Start Year: 2019	End Year: 2023	Outcome:	Objective:	
			Availability/accessibility	Create suitable living environments	
	Description: Provide needed social services to citizens of the Urban County.				
Goal Outcome Indicator	Quantity		UoM		
Public service activities for Low/Moderate Income Housing Benefit	100		Households Assisted		
<b>Create Opportunities for Affordable Housing Choice</b>	Affordable Housing Homeless Other	Shelby County Urban County Entitlement Area	Affordable Housing	CDBG :	\$0
				HOME :	\$283,022
	Start Year: 2019	End Year: 2023	Outcome:	Objective:	
			Availability/accessibility	Provide decent affordable housing	
	Description: Create opportunities for affordable housing choice with the use of HOME CHDO setaside. Outcomes include availability/accessibility as well as affordability.				
Goal Outcome Indicator	Quantity		UoM		
Homeowner Housing Added	5		Household Housing Unit		

### **3. Evaluation of past performance**

SCDH has been a CDBG Urban Entitlement grantee since 1992 and a HOME participating jurisdiction since 1994. Since that time, SCDH has sought to expand its partnership base in order to utilize existing resources more efficiently and create greater impact for each HUD dollar spent in Shelby County. Since becoming a grantee, SCDH has inspected over 1,500 housing units, fully rehabilitated more than 1000 homes, made more than 1000 units lead safe, and completed more than 100 public facility and infrastructure projects. This record of successful accomplishment has been integral to exceeding program goals and benchmarks and has provided the capacity to implement the strategies necessary to address the high priority housing and community development needs described in this 5-Year Strategy.

### **4. Summary of citizen participation process and consultation process**

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

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

A public notice promoting a public hearing regarding community development needs was published in Spanish in the January 13, 2019 edition of La Prensa, a newspaper serving the Spanish speaking members of the community and in the Memphis Flyer, the Daily News, and the Tri-State Defender on January 17, 2019. A public hearing on community development needs was held on January 31, 2019. No one attended this hearing aside from two SCDH staff members.

### **5. Summary of public comments**

During the 30 day public review period, April 1, 2019 through April 30, 2019, only one comment was received.

**Comment:** Beverly Ross, a resident of Memphis, called on 3/28/2019 to ask why the scheduled public hearings weren't being held at locations within the city of Memphis, specifically the main library. Ms. Ross cited transportation barriers as the cause for concern and a deterrent to attendees. Ms. Ross saw the public notice in the *Memphis Flyer* on 3/28/2019 promoting public hearings on the proposed 5 year strategy and annual action plan.

**Response:** SCDH staff explained to Ms. Ross that the Shelby County Entitlement Community is comprised of the county outside of the City of Memphis. The public hearings had been scheduled in



locations convenient to members of the Urban County (Bartlett Library, Collierville Library, and offices at Shelby County Government) to encourage the intended beneficiaries of the proposed 5-year strategy and Annual Action Plan to attend. Ms. Ross was advised that the City of Memphis is an entitlement community and that their proposed 5-year strategy and Annual Action Plan were being developed and a public hearing would follow. Ms. Ross was encouraged to contact the City of Memphis Housing and Community Development (HCD) office in order to get information on their consolidated planning efforts. Ms. Ross declined to take contact information for the City of Memphis's HCD.

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

No comments or views received were not accepted.

## **7. Summary**

If current funding remains constant, SCDH anticipates receiving \$5,997,115 in CDBG funds and \$2,386,342 in HOME funds to address high priority needs during the 5-Year Strategy period. By addressing these needs, SCDH will advance the goals to preserve housing affordability, improve and construct public facilities, provide public services, and create opportunities for affordable housing of choice in Shelby County. During the first year of the 5-Year Strategy period, as described in the One Year Annual Action Plan for the period of July 1, 2019 through June 30, 2020, SCDH will utilize these CDBG and HOME resources to accomplish the following:

1. Preserve Housing Affordability: complete rehabilitation or minor home repair on 25 owner-occupied homes
2. Improve and Construct Public Facilities: complete 2 infrastructure projects to address community development needs
3. Provide Public Services: provide recreational activities to benefit Senior Citizens in 20 households
4. Create Opportunities for Affordable Housing Choice: Acquisition of one unit to create an affordable housing opportunity

## The Process

### PR-05 Lead & Responsible Agencies 24 CFR 91.200(b)

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

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

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

**Table 1 – Responsible Agencies**

### Narrative

SCDH served as the lead agency responsible for preparing this 5 Year Strategy and Annual Plan and is also the major public agency responsible for administering all CDBG and HOME assisted programs covered by this 5 Year Strategy. SCDH will be advised by the Urban County Consortium and will be under the direct authority of the Mayor of Shelby County, who will have final approval for all expenditures. The Urban County Consortium is composed of the Mayor of Shelby County and the Mayors of the six Entitlement Area municipalities (Arlington, Bartlett, Collierville, Germantown, Lakeland, and Millington), or their respective designee.

### Consolidated Plan Public Contact Information

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## **PR-10 Consultation - 91.100, 91.200(b), 91.215(I)**

### **1. Introduction**

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

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

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

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

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

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

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

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

**Table 2 – Agencies, groups, organizations who participated**

1	<b>Agency/Group/Organization</b>	BARTLETT
	<b>Agency/Group/Organization Type</b>	Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Needs, Con-Housing Community Development Needs, Public Service Needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	As a member of the Urban County Consortium, the Town of Bartlett was engaged in all aspects of the planning process, particularly by identifying and prioritizing housing needs, non-housing community development needs, and public service needs. The organization was also provided a copy of the draft 5 Year Strategy and Annual Plan for review and comment.
2	<b>Agency/Group/Organization</b>	COLLIERVILLE
	<b>Agency/Group/Organization Type</b>	Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Needs, Con-Housing Community Development Needs, Public Service Needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	As a member of the Urban County Consortium, the Town of Collierville was engaged in all aspects of the planning process, particularly by identifying and prioritizing housing needs, non-housing community development needs, and public service needs. The organization was also provided a copy of the draft 5 Year Strategy and Annual Plan for review and comment.
3	<b>Agency/Group/Organization</b>	ARLINGTON
	<b>Agency/Group/Organization Type</b>	Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Needs, Con-Housing Community Development Needs, Public Service Needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	As a member of the Urban County Consortium, the Town of Arlington was engaged in all aspects of the planning process, particularly by identifying and prioritizing housing needs, non-housing community development needs, and public service needs. The organization was also provided a copy of the draft 5 Year Strategy and Annual Plan for review and comment.

4	<b>Agency/Group/Organization</b>	Lakeland
	<b>Agency/Group/Organization Type</b>	Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Needs, Con-Housing Community Development Needs, Public Service Needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	As a member of the Urban County Consortium, the City of Lakeland was engaged in all aspects of the planning process, particularly by identifying and prioritizing housing needs, non-housing community development needs, and public service needs. The organization was also provided a copy of the draft 5 Year Strategy and Annual Plan for review and comment.
5	<b>Agency/Group/Organization</b>	MILLINGTON
	<b>Agency/Group/Organization Type</b>	Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Needs, Con-Housing Community Development Needs, Public Service Needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	As a member of the Urban County Consortium, the City of Millington was engaged in all aspects of the planning process, particularly by identifying and prioritizing housing needs, non-housing community development needs, and public service needs. The organization was also provided a copy of the draft 5 Year Strategy and Annual Plan for review and comment.
6	<b>Agency/Group/Organization</b>	Germantown
	<b>Agency/Group/Organization Type</b>	Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Needs, Con-Housing Community Development Needs, Public Service Needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	As a member of the Urban County Consortium, the City of Germantown was invited to be engaged in all aspects of the planning process, particularly by identifying and prioritizing housing needs, non-housing community development needs, and public service needs. The organization was also provided a copy of the draft 5 Year Strategy and Annual Plan for review and comment.

7	<b>Agency/Group/Organization</b>	Community Alliance for the Homeless
	<b>Agency/Group/Organization Type</b>	Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Information provided by the Community Alliance for the Homeless was used to inform the homeless special needs section of the Needs Assessment and the organization was provided a copy of the draft 5 Year Strategy and Annual Plan for review and comment.
8	<b>Agency/Group/Organization</b>	Millington Housing Authority
	<b>Agency/Group/Organization Type</b>	PHA
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Market Analysis
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Millington Housing Authority (MiLLHA) provided input to inform the public housing section of the Needs Assessment, Market Analysis, Strategic Plan and Annual Action Plan. The organization was also provided a copy of the draft 5 Year Strategy and Annual Plan for review and comment.
9	<b>Agency/Group/Organization</b>	Plough Foundation
	<b>Agency/Group/Organization Type</b>	Services-Elderly Persons
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-Homeless Special Needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The Plough Foundation provided input to inform the non-homeless special needs portions of the Needs Assessment, Market Analysis, Strategic Plan and Annual Action Plan. The organization was also provided a copy of the draft 5 Year Strategy and Annual Plan for review and comment.
10	<b>Agency/Group/Organization</b>	Shelby County Crime Victims Center
	<b>Agency/Group/Organization Type</b>	Services - Victims Other government - County

	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-Homeless Special Needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The Shelby County Crime Victims Center provided input to inform the non-homeless special needs portions of the Needs Assessment, Market Analysis, Strategic Plan and Annual Action Plan. The organization was also provided a copy of the draft 5 Year Strategy and Annual Plan for review and comment.
11	<b>Agency/Group/Organization</b>	Shelby County Office of Resilience
	<b>Agency/Group/Organization Type</b>	Other government - County
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Market Analysis
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The Shelby County Office of Resilience provided input to inform the resilience portions of the Needs Assessment and Market Analysis. The organization was also provided a copy of the draft 5 Year Strategy and Annual Plan for review and comment.
12	<b>Agency/Group/Organization</b>	Workforce Investment Network (WIN)
	<b>Agency/Group/Organization Type</b>	Services-Employment Other government - County
	<b>What section of the Plan was addressed by Consultation?</b>	Market Analysis
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The Workforce Investment Network provided input to inform the employment, labor market, and economic development portions of the Needs Assessment and Market Analysis. The organization was also provided a copy of the draft 5 Year Strategy and Annual Plan for review and comment.
13	<b>Agency/Group/Organization</b>	Greater Memphis Chamber
	<b>Agency/Group/Organization Type</b>	Economic Development Organization
	<b>What section of the Plan was addressed by Consultation?</b>	Economic Development Market Analysis

	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The Greater Memphis Chamber provided input to inform the employment, labor market, economic development, and housing vacancy portions of the Needs Assessment and Market Analysis. The organization was also provided a copy of the draft 5 Year Strategy and Annual Plan for review and comment.
14	<b>Agency/Group/Organization</b>	Shelby County Land Bank
	<b>Agency/Group/Organization Type</b>	Other government - County
	<b>What section of the Plan was addressed by Consultation?</b>	Market Analysis
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The Shelby County Land Bank provided input to inform the housing vacancy portions of the Needs Assessment and Market Analysis. The organization was also provided a copy of the draft 5 Year Strategy and Annual Plan for review and comment.

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

No relevant agencies providing services in the Entitlement Area jurisdiction were identified and deliberately not consulted in the preparation of this plan.

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

<b>Name of Plan</b>	<b>Lead Organization</b>	<b>How do the goals of your Strategic Plan overlap with the goals of each plan?</b>
Continuum of Care	Community Alliance for the Homeless	SCDH does not receive direct funding for homelessness prevention. However, Shelby County Government supports the efforts of the Community Alliance for the Homeless in partnership with the.

**Table 3 – Other local / regional / federal planning efforts**

**Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(I))**

Coordination with local units of government, particularly the six municipal members of the Urban County Consortium, are detailed in the above table of organizations consulted.



## **PR-15 Citizen Participation**

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

Efforts to solicit citizen participation during preparation of the plan included numerous newspaper notices advertising public hearings, including a hearing to gain input on housing and community development needs. Such notices were also published on the Shelby County Department of Housing's website. Additionally, the Urban County Consortium (UCC) was engaged in all stages of the planning process. Composed of representatives from all jurisdictions in the urban county entitlement area, the UCC was well positioned to identify housing and community development needs in the urban county in order to shape the goals for the 5 Year Strategy.

**Citizen Participation Outreach**

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
1	Meeting with Individual Urban County Consortium Member, Collierville	Collierville	Meeting held on 11/27/2018. 3 representatives from Collierville met with SCDH staff to discuss the planning process for the 5-year strategy and members were asked to begin identifying and prioritizing community development needs to include housing, infrastructure, and public services.	Comments included discussion of eligible activities and national objectives as they might relate to addressing high priority community development, housing, and public service needs	No comments were rejected	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2	Meeting with Individual Urban County Consortium Member, Collierville	Millington	Meeting held on 11/28/2018. 2 representatives from Millington met with SCDH staff to discuss the planning process for the 5-year strategy and members were asked to begin identifying and prioritizing community development needs to include housing, infrastructure, and public services.	Comments included discussion of eligible activities and national objectives as they might relate to addressing high priority community development, housing, and public service needs. Status on current community development projects in Millington were also discussed.	No comments were rejected	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
3	Meeting with Individual Urban County Consortium Member, Collierville	Bartlett	Meeting held on 11/29/2018. 2 representatives from Bartlett met with SCDH staff to discuss the planning process for the 5-year strategy and members were asked to begin identifying and prioritizing community development needs to include housing, infrastructure, and public services.	Comments included discussion of eligible activities and national objectives as they might relate to addressing high priority community development, housing, and public service needs. Status on current community development projects in Bartlett were also discussed.	No comments were rejected	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
4	Meeting with Individual Urban County Consortium Member, Collierville	Arlington	Meeting held on 12/4/2018. 1 representative from Arlington met with SCDH staff to discuss the planning process for the 5-year strategy and members were asked to begin identifying and prioritizing community development needs to include housing, infrastructure, and public services.	Comments included discussion of eligible activities and national objectives as they might relate to addressing high priority community development, housing, and public service needs.	No comments were rejected	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
5	Meeting with Individual Urban County Consortium Member, Collierville	Germantown	Meeting held on 12/5/2018. 2 representatives from Germantown met with SCDH staff to discuss the planning process for the 5-year strategy and members were asked to begin identifying and prioritizing community development needs to include housing, infrastructure, and public services.	Comments included discussion of eligible activities and national objectives as they might relate to addressing high priority community development, housing, and public service needs.	No comments were rejected	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
6	Meeting with Individual Urban County Consortium Member, Collierville	Unincorporated Shelby County	Meeting held on 12/6/2018. 8 representatives from Unincorporated Shelby County met with SCDH staff to discuss the planning process for the 5-year strategy and members were asked to begin identifying and prioritizing community development needs to include housing, infrastructure, and public services.	Comments included discussion of eligible activities and national objectives as they might relate to addressing high priority community development, housing, and public service needs.	No comments were rejected	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
7	Meeting with Individual Urban County Consortium Member, Collierville	Lakeland	Meeting held on 12/6/2018. 2 representatives from Unincorporated Shelby County met with SCDH staff to discuss the planning process for the 5-year strategy and members were asked to begin identifying and prioritizing community development needs to include housing, infrastructure, and public services.	Comments included discussion of eligible activities and national objectives as they might relate to addressing high priority community development, housing, and public service needs.	No comments were rejected	
8	Newspaper Ad	Minorities  Non-English Speaking - Specify other language: Spanish	N/A	N/A	N/A. Public Notice promoting community development needs public hearing held on 1/31/2019. Ad was published in La Prensa on 1/13/2019.	



Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
9	Newspaper Ad	Non-targeted/broad community	N/A	N/A	N/A. Public Notice promoting community development needs public hearing held on 1/31/2019. Ad was published in The Daily News on 1/17/2019.	
10	Newspaper Ad	Non-targeted/broad community	N/A	N/A	N/A. Public Notice promoting community development needs public hearing held on 1/31/2019. Ad was published in the Memphis Flyer on 1/17/2019.	
11	Newspaper Ad	Minorities	N/A	N/A	N/A. Public Notice promoting community development needs public hearing held on 1/31/2019. Ad was published in the Tri-State Defender on 1/17/2019.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
12	Internet Outreach	Non-targeted/broad community	N/A	N/A	N/A. Public Notice promoting community development needs public hearing held on 1/31/2019. Notice was posted on the landing page of the SCDH website from 1/11/2019 thru 1/31/2019.	
13	Public Hearing	Non-targeted/broad community	Hearing held on 1/31/2019. No one attended other than two SCDH staff members.	No comments were received	No comments were rejected	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
14	Meeting with Individual Urban County Consortium Member, Collierville	Urban County	Meeting was held on March 12, 2019 and was attended by 9 consortium members as well as 4 SCDH staff members. Status of the planning process was discussed and PY2019 allocations and project recommendations for infrastructure and public service activities were discussed and prioritized as a group. The status of the Analysis of Impediments (AI) was discussed and the board was invited to provide feedback on the draft AI.	Board members discussed the projects that were identified as a priority by the various towns that constitute the Urban County. AP1 and AP2 project and public service activities were tentatively selected. Board members also discussed how the Public Service program would be structured.	No comments were rejected	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
15	Newspaper Ad	Minorities  Non-English Speaking - Specify other language: Spanish	N/A	N/A	N/A. Public Notice promoting public hearing on proposed 5-year strategy and Annual Action Plan for PY2019 which were held on 4/15/2019, 4/17/2019, and 4/23/2019. Ad was published in La Prensa on 3/24/2019.	
16	Newspaper Ad	Non-targeted/broad community	N/A	N/A	N/A. Public Notice promoting public hearing on proposed 5-year strategy and Annual Action Plan for PY2019 which were held on 4/15/2019, 4/17/2019, and 4/23/2019. Ad was published in The Daily News 3/28/2019.	

17	Newspaper Ad	Non-targeted/broad community	N/A	<p>Beverly Ross, a resident of Memphis, called on 3/28/2019 to ask why the scheduled public hearings weren't being held at locations within the city of Memphis, specifically the main library. Ms. Ross cited transportation barriers as the cause for concern and a deterrent to attendees. SCDH staff explained to Ms. Ross that the Shelby County Entitlement Community is comprised of the county outside of the city of Memphis. The public hearings had been scheduled in locations</p>	<p>N/A. Public Notice promoting public hearing on proposed 5-year strategy and Annual Action Plan for PY2019 which were held on 4/15/2019, 4/17/2019, and 4/23/2019. Ad was published in The Memphis Flyer on 3/28/2019.</p>	
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				<p>convenient to members of the Urban County (Bartlett Library, Collierville Library, and offices at Shelby County Government) to encourage the intended beneficiaries of the proposed 5-year strategy and Annual Action Plan to attend. Ms. Ross was advised that the City of Memphis is an entitlement community and that their proposed 5-year strategy and Annual Action Plan were being developed and a public hearing would follow. Ms. Ross was encouraged to contact the City of</p>		
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Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
				Memphis Housing and Community Development (HCD) office in order to get information on their consolidated planning efforts. Ms. Ross declined to take contact information for the City of Memphis's HCD.		
18	Newspaper Ad	Minorities	N/A	N/A	N/A. Public Notice promoting public hearing on 5-year strategy and Annual Action Plan for PY2019 which were held on 4/15/2019, 4/17/2019, and 4/23/2019. Ad was published in The New Tri-State Defender on 3/28/2019.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
19	Newspaper Ad	Millington	N/A	N/A	N/A. Public Notice promoting public hearing on 5-year strategy and Annual Action Plan for PY2019 which were held on 4/15/2019, 4/17/2019, and 4/23/2019. Ad was published in the Millington Star on 3/28/2019.	
20	Newspaper Ad	Germantown	N/A	N/A	N/A. Public Notice promoting public hearing on 5-year strategy and Annual Action Plan for PY2019 which were held on 4/15/2019, 4/17/2019, and 4/23/2019. Ad was published in the Germantown News on 3/27/2019.	



Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
21	Newspaper Ad	Bartlett	N/A	N/A	N/A. Public Notice promoting public hearing on 5-year strategy and Annual Action Plan for PY2019 which were held on 4/15/2019, 4/17/2019, and 4/23/2019. Ad was published in the Bartlett Express on 3/27/2019.	
22	Newspaper Ad	Collierville	N/A	N/A	N/A. Public Notice promoting public hearing on 5-year strategy and Annual Action Plan for PY2019 which were held on 4/15/2019, 4/17/2019, and 4/20/2019. Ad was published in the Collierville Herald on 3/28/2019.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
23	Internet Outreach	Non-targeted/broad community	N/A	N/A	N/A. Public Notice promoting public hearing on 5-year strategy and Annual Action Plan for PY2019 which were held on 4/15/2019, 4/17/2019, and 4/20/2019. Notice was posted on the landing page of the SCDH website from 4/1/2019 thru 4/30/2019.	
24	Internet Outreach	Non-targeted/broad community	N/A	N/A	Public Notice promoting public hearing on 5-year strategy and Annual Action Plan for PY2019 which were held on 4/15/2019, 4/17/2019, and 4/20/2019 was sent to the main library's list serv on 4/1/2019.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
25	Public Hearing	Non-targeted/broad community	Public Hearing held 4/15/2019 at Shelby County Government Offices. No one attended other than two SCDH staff.	No comments were received	No comments were rejected	
26	Public Hearing	Non-targeted/broad community	Public Hearing held 4/17/2019 at Collierville Library. No one attended other than two SCDH staff.	No comments were received	No comments were rejected	
27	Public Hearing	Non-targeted/broad community	Public Hearing held 4/23/2019 at Bartlett Library. No one attended other than one SCDH staffer.	No comments were received	No comments were rejected	

**Table 4 – Citizen Participation Outreach**

# Needs Assessment

## NA-05 Overview

### Needs Assessment Overview

Affordable housing for homeowners and renters is the most significant housing need in Shelby County, and single family homeowners make up the greatest share of cost burdened households. Overcrowding and substandard housing are additional housing problems, affecting renters at a higher rate than homeowners.

Disabled and elderly households have an increased risk of experiencing housing problems. Black/African American households is the racial/ethnic group most likely to be affected by housing problems. Success with Rapid Rehousing and Permanent Supportive Housing has led to a decrease in the homeless population and the number of families returning to or timing out of shelters.

In Shelby County Department of Housing's jurisdiction, Black/African American households have a disproportionately greater need due to housing problems in each of the income categories. Hispanic households also have a disproportionately greater need due to housing problems for incomes ranging from 0-80% of the area median income.

In all income categories, Black/African American households have a disproportionately greater need due to severe housing problems. Hispanic households also have a disproportionately greater need due to severe housing problems in the 30-50% and 80-100% AMI ranges.

Black/African American households in this jurisdiction are disproportionately more cost burdened and severely cost burdened than any other racial or ethnic group.

At all income categories, Black/African American households are more likely to have a disproportionately greater need due to housing or severe housing problems. The highest disparity is in the 0-30% AMI range for disproportionately greater need due to housing problems, where

Hispanic households have a disproportionately higher need due to housing for incomes ranging from 0-80% of the AMI.

Because Memphis and Shelby County are combined into one CoC, it is difficult to estimate the homeless population in Shelby County alone. Virtually all services available to the homeless population are located within the City of Memphis.

The non-homeless special needs population in Shelby County includes individuals such as the elderly and frail elderly, severe mentally ill, developmentally disabled and the physically disabled. Those that suffer

from substance abuse issues, living with HIV/AIDS, and victims of domestic violence are also included in this population. Due to the complexity of these issues, some members of the special needs population have more than one of these issues.

Non-housing community development needs identified within the Urban County include sidewalk improvements, flood drain improvements, water/sewer improvements, and street improvements.

## NA-10 Housing Needs Assessment - 24 CFR 91.205 (a,b,c)

### Summary of Housing Needs

Affordable housing for renters and homeowners is the most significant housing need in Shelby County, and single family homeowners make up the greatest share of cost burdened households. Overcrowding and substandard housing are additional housing problems, affecting renters at a higher rate than homeowners.

Disabled and elderly households have an increased risk of experiencing housing problems. Black/African American households is the racial/ethnic group most likely to be affected by housing problems. Success with Rapid Rehousing and Permanent Supportive Housing has led to a decrease in the homeless population and the number of families returning to or timing out of shelters.

Demographics	Base Year: 2010	Most Recent Year: 2016	% Change
Population	267,820	281,133	5%
Households	93,948	98,336	5%
Median Income	\$64,834.00	\$69,901.00	8%

**Table 5 - Housing Needs Assessment Demographics**

**Alternate Data Source Name:**

2006-2010, 2012-2016 ACS 5-Year Estimates

**Data Source Comments:**

### Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	4,775	5,730	10,215	7,585	69,145
Small Family Households	1,490	2,275	4,215	3,070	40,110
Large Family Households	445	585	1,010	805	5,960
Household contains at least one person 62-74 years of age	1,020	1,260	2,165	1,735	14,205
Household contains at least one person age 75 or older	710	845	1,765	985	4,145
Households with one or more children 6 years old or younger	925	1,105	1,650	1,485	10,250

**Table 6 - Total Households Table**

**Alternate Data Source Name:**

2011-2015 CHAS

**Data Source Comments:**

## Housing Needs Summary Tables

### 1. Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total	0-30% AMI	>30- 50% AMI	>50- 80% AMI	>80- 100% AMI	Total
<b>NUMBER OF HOUSEHOLDS</b>										
Substandard Housing - Lacking complete plumbing or kitchen facilities	70	60	65	100	295	20	35	25	0	80
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	15	15	70	0	100	0	20	10	65	95
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	100	90	175	210	575	30	65	115	70	280
Housing cost burden greater than 50% of income (and none of the above problems)	1,515	1,275	285	50	3,125	1,485	1,435	1,550	535	5,005

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Housing cost burden greater than 30% of income (and none of the above problems)	65	925	1,915	825	3,730	270	740	1,800	1,760	4,570
Zero/negative Income (and none of the above problems)	390	0	0	0	390	370	0	0	0	370

**Table 7 – Housing Problems Table**

Alternate Data Source Name:  
2011-2015 CHAS  
Data Source  
Comments:

2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
<b>NUMBER OF HOUSEHOLDS</b>										
Having 1 or more of four housing problems	1,705	1,450	600	360	4,115	1,540	1,555	1,705	670	5,470
Having none of four housing problems	395	1,310	2,980	2,160	6,845	370	1,410	4,935	4,395	11,110
Household has negative income, but none of the other housing problems	390	0	0	0	390	370	0	0	0	370

**Table 8 – Housing Problems 2**



Alternate Data Source Name:  
2011-2015 CHAS  
Data Source  
Comments:

### 3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	655	1,000	1,105	2,760	530	950	1,630	3,110
Large Related	285	265	210	760	110	170	250	530
Elderly	430	435	385	1,250	720	890	1,005	2,615
Other	385	625	635	1,645	440	270	520	1,230
Total need by income	1,755	2,325	2,335	6,415	1,800	2,280	3,405	7,485

Table 9 – Cost Burden > 30%

Alternate Data Source Name:  
2011-2015 CHAS  
Data Source  
Comments:

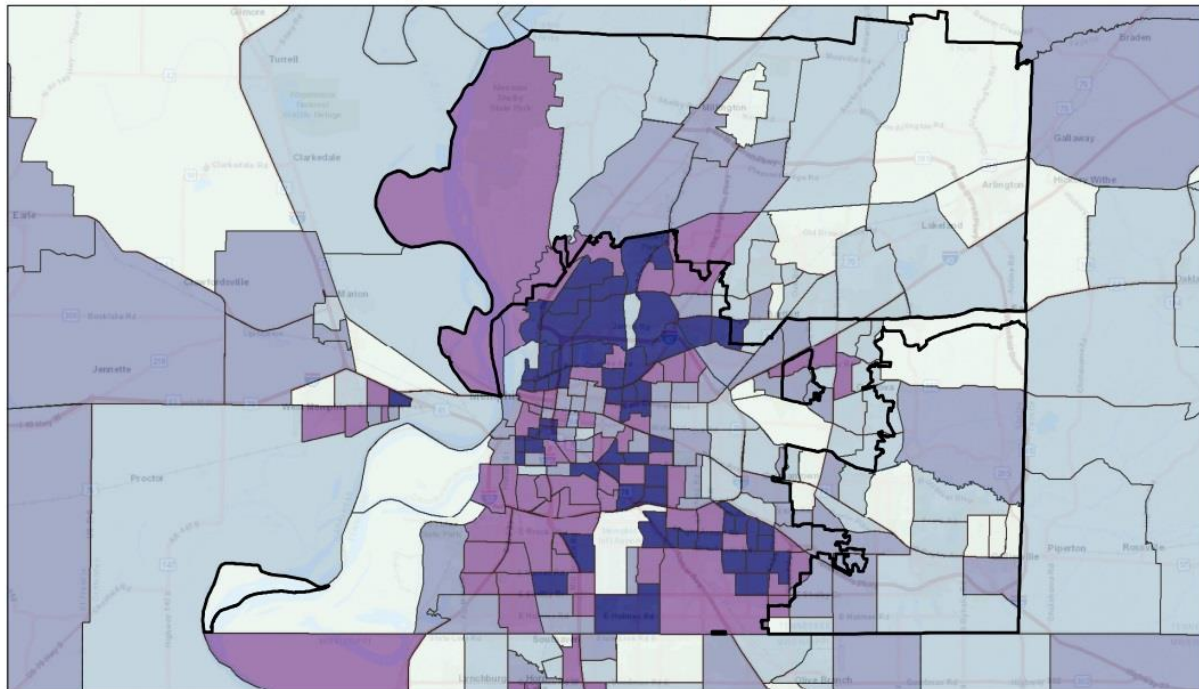
### 4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	655	685	60	1,400	465	720	770	1,955
Large Related	280	185	30	495	110	75	105	290
Elderly	390	175	110	675	565	465	535	1,565
Other	365	270	135	770	395	210	155	760
Total need by income	1,690	1,315	335	3,340	1,535	1,470	1,565	4,570

Table 10 – Cost Burden > 50%

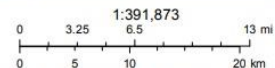
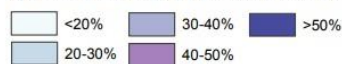
Alternate Data Source Name:  
2011-2015 CHAS  
Data Source  
Comments:

### Housing Cost Burden - Shelby County CBDG



April 23, 2019

% of Households Paying >30% of Income Towards Housing



Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, © OpenStreetMap contributors, and the GIS User Community

### CPD Map- Housing Cost Burden

#### 5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
<b>NUMBER OF HOUSEHOLDS</b>										
Single family households	50	60	200	120	430	35	40	90	40	205
Multiple, unrelated family households	70	45	46	90	251	0	40	35	96	171
Other, non-family households	0	0	0	0	0	0	0	0	0	0
Total need by income	120	105	246	210	681	35	80	125	136	376

Table 11 – Crowding Information – 1/2

Alternate Data Source Name:

2011-2015 CHAS

Data Source Comments:

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present	0	0	0	0	0	0	0	0

Table 12 – Crowding Information – 2/2

Data Source  
Comments:

**Describe the number and type of single person households in need of housing assistance.**

According to 2015 CHAS data, there are an estimated 22,840 non-family (single person) households, of which 8,720 are elderly. There are 8,030 non-family households that have one or more of the four housing problems, and 3,275 of those households are elderly.

7,835 (34.3%) non-family households are cost burdened, with 3,360 (14.7%) severely cost burdened, and 510 (2.2%) have no income. 190 non-family households lack plumbing or kitchen facilities.

**Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.**

According to 2015 CHAS data, there are 36,445 households with a member that is disabled living in the jurisdiction. 12,500 of disabled households have one or more housing problem, and 340 disabled households have zero or negative income.

The Shelby County Crime Victims Center, which assists victims of domestic violence, sexual assault, and stalking, does not have data on the number of victims in need of housing assistance, but they have expressed a significant need for emergency shelters in the community for victims of violence, particularly victims of domestic and family violence.

**What are the most common housing problems?**

The most common housing problem in the jurisdiction, by far, is affordable housing. Of the 17,855 households that experience one or more of the four housing problems, 13,900 households are cost burdened, paying more than 30% of their income towards rent. 7,910 households are severely cost burdened, paying more than 50% of their income towards rent.

**Are any populations/household types more affected than others by these problems?**

Single family homeowners make up the greatest share of households who are severely cost burdened, followed by elderly homeowners. Single family renters are also severely cost burdened, and are more likely to experience crowding than other household types.

**Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance**

According to the Community Alliance for the Homeless, the Memphis area is housing an all-time high number of families, and these families are not timing out of shelters or returning to shelters. In 2017, 11% of those who went from a shelter to permanent housing through Rapid Rehousing returned to homelessness within 24 months. The high success rate is likely due to the low barriers of entry to the program, where participants move directly into housing without preconditions of sobriety, lack of income, poor credit history, past eviction, or a criminal history. Participants are also only evicted for severe and repeated violations of their lease.

According to the Substance Abuse and Mental Health Services Administration (SAMHSA), in January 2016, one in five people experiencing homelessness had a serious mental disorder. Alliance Healthcare Services (AHS), a local mental health center, provides services to chronically homeless individuals. AHS annually serves at least 80 individuals who are housed through permanent supportive housing providers.

In September 2012, Memphis was selected as one of five communities to receive a grant covering a five-year period to provide supportive housing to homeless and unstably housed families involved in the child welfare system. Shelby County currently has 1,366 units of Permanent Supportive Housing (PSH) for homeless individuals and families. The permanent housing programs have a 95% retention rate, and families may live there as long as needed, causing sustainability to not be an issue.

**If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:**

The jurisdiction does not provide estimates of the at-risk populations.

**Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness**

According to the National Alliance to End Homelessness, the most common living situation prior to homelessness was being doubled up with family and friends. According to the tables above, in 2016 Shelby County had 1,057 individuals and families that were experiencing crowding.

While homelessness has drastically decreased over the past six years, it rose slightly in 2018 from 2017. The Community Alliance for the Homeless attributes this to the high poverty rate in the area. Families

often have trouble finding affordable housing due to the lack of supply combined with stagnant incomes. While median household incomes have risen in this jurisdiction, incomes in general have risen for professional/managerial roles while they have remained stagnant for the service industry and working class, and the minimum wage has not risen above \$7.25/hour since 2009. According to the tables above, 7,910 families and individuals in the jurisdiction are extremely cost burdened, paying more than 50% of their income towards housing.

### **Discussion**

Affordable housing is the most pressing housing need in the Shelby County jurisdiction. Cost burden and extreme cost burden are common housing problems across all low- income households, both renter and owner.

## NA-15 Disproportionately Greater Need: Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

### Introduction

In Shelby County Department of Housing’s jurisdiction, Black/African American households have a disproportionately greater need due to housing problems in each of the income categories. Hispanic households also have a disproportionately greater need due to housing problems for incomes ranging from 0-80% of the area median income.

### 0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	3,580	430	760
White	1,765	315	265
Black / African American	1,570	95	440
Asian	5	0	25
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	155	15	35
0	0	0	0

Table 13 - Disproportionally Greater Need 0 - 30% AMI

Alternate Data Source Name:

2011-2015 CHAS

Data Source Comments:

\*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

### 30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	4,665	1,065	0
White	2,290	645	0

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Black / African American	1,880	310	0
Asian	160	15	0
American Indian, Alaska Native	0	25	0
Pacific Islander	0	0	0
Hispanic	270	30	0
0	0	0	0

**Table 14 - Disproportionally Greater Need 30 - 50% AMI**

Alternate Data Source Name:

2011-2015 CHAS

Data Source Comments:

\*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

### 50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	6,020	4,195	0
White	3,220	2,830	0
Black / African American	2,295	880	0
Asian	135	85	0
American Indian, Alaska Native	11	10	0
Pacific Islander	0	0	0
Hispanic	345	220	0
0	0	0	0

**Table 15 - Disproportionally Greater Need 50 - 80% AMI**

Alternate Data Source Name:

2011-2015 CHAS

Data Source Comments:

\*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

## 80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	3,615	3,970	0
White	2,310	2,390	0
Black / African American	1,165	1,225	0
Asian	40	145	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	75	195	0
0	0	0	0

**Table 16 - Disproportionally Greater Need 80 - 100% AMI**

Alternate Data Source Name:

2011-2015 CHAS

Data Source Comments:

\*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

## Discussion

In each of the income categories, there are more White households that have one or more housing problems than any other racial or ethnic group. White households make up over 65% of the jurisdiction's population, so these figures need to be adjusted for population to accurately see if any race or ethnicity has a disproportionately greater need.

Of households that make less than 30% of the area median income, 75% have one or more housing problems. Black/African American and Hispanic households have a disproportionately greater need due to housing problems, with Black/African American households making up 43.9% of households with housing problems while making up 27.3% of the population. Hispanic households make up 2.6% of the population, yet make up 4.3% of the population with housing problems in this income range.

Of households that make 30 to 50% of the area median income, 81% have one or more housing problems. Black/African American and Hispanic households are disproportionately more likely to have housing problems, making up 40.3% and 5.8% of households with housing problems, respectively.

Of households that make 50 to 80% of the area median income, 59% have one or more housing problems. Black/African American, Hispanic, and American Indian or Alaskan Native have a disproportionately greater need due to housing problems. Black/African American households make up 38.1% of households with one or more housing problems, while Hispanic households make up 5.7% of



households with housing problems. American Indian or Alaskan Natives make up 0.2% of the households with one or more problems, while making up 0.1% of the overall population.

Of households that make 80 to 100% of the area median income, 48% have one or more housing problems. Black/African American households have a disproportionately greater need due to housing problems, making up 32.2% of total households with one or more housing problems.

## NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

### Introduction

In all income categories, Black/African American households have a disproportionately greater need due to severe housing problems. Hispanic households also have a disproportionately greater need due to severe housing problems in the 30-50% and 80-100% AMI ranges.

### 0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	3,245	765	370
White	1,520	560	265
Black / African American	1,535	130	440
Asian	5	0	25
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	105	60	35
0	0	0	0

Table 17 – Severe Housing Problems 0 - 30% AMI

Alternate Data Source Name:

2011-2015 CHAS

Data Source Comments:

\*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

### 30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	3,005	2,720	0
White	1,395	1,550	0

<b>Severe Housing Problems*</b>	<b>Has one or more of four housing problems</b>	<b>Has none of the four housing problems</b>	<b>Household has no/negative income, but none of the other housing problems</b>
Black / African American	1,285	895	0
Asian	105	70	0
American Indian, Alaska Native	0	25	0
Pacific Islander	0	0	0
Hispanic	170	135	0
Other	0	0	0

**Table 18 – Severe Housing Problems 30 - 50% AMI**

**Alternate Data Source Name:**

2011-2015 CHAS

**Data Source Comments:**

\*The four severe housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than 1.5 persons per room,
4. Cost Burden over 50%

### **50%-80% of Area Median Income**

<b>Severe Housing Problems*</b>	<b>Has one or more of four housing problems</b>	<b>Has none of the four housing problems</b>	<b>Household has no/negative income, but none of the other housing problems</b>
Jurisdiction as a whole	2,305	7,915	0
White	1,235	4,830	0
Black / African American	935	2,250	0
Asian	45	170	0
American Indian, Alaska Native	10	10	0
Pacific Islander	0	0	0
Hispanic	75	480	0
Other	0	0	0

**Table 19 – Severe Housing Problems 50 - 80% AMI**

**Alternate Data Source Name:**

2011-2015 CHAS

**Data Source Comments:**

\*The four severe housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than 1.5 persons per room,
4. Cost Burden over 50%

## 80%-100% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,030	6,555	0
White	680	4,025	0
Black / African American	315	2,080	0
Asian	0	185	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	45	230	0
Other	0	0	0

**Table 20 – Severe Housing Problems 80 - 100% AMI**

Alternate Data Source Name:

2011-2015 CHAS

Data Source Comments:

\*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

## Discussion

Of households that make less than 30% of the area median income, 68% have one or more housing problems. Black/African American households have a disproportionately greater need due to severe housing problems. 47.3% of the households with one or more housing problems are Black/African American households, though Black/African American households only make up 27.3% of the population in this jurisdiction.

Of households that make 30 to 50% of the area median income, 53% have one or more housing problems. Black/African American and Hispanic households have a disproportionately greater need due to severe housing problems, with 42.8% of all households with severe housing problems being Black/African American. Hispanic households make up 5.7% of households in this income range with severe housing problems, while Hispanic households make up 2.6% of the population.

Of households that make 50 to 80% of the area median income, 23% have one or more housing problems. Black/African American households have a disproportionately greater need due to severe housing problems, making up 40.6% of all households in this income range with severe housing problems.

Of households that make 80 to 100% of the area median income, 14% have one or more housing problems. Black/African American and Hispanic households have a disproportionately greater need due to severe housing problems, with 30.6% of all households with severe housing problems being Black/African American, and 4.4% of households with severe housing problems being Hispanic.

## NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

### Introduction:

Black/African American households in this jurisdiction are disproportionately more cost burdened and severely cost burdened than any other racial or ethnic group.

### Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	73,170	14,055	9,445	760
White	50,300	8,195	5,105	265
Black / African American	17,645	4,790	3,770	435
Asian	2,690	445	175	25
American Indian, Alaska Native	95	0	5	0
Pacific Islander	0	10	0	0
Hispanic	1,725	525	265	35

**Table 21 – Greater Need: Housing Cost Burdens AMI**

**Alternate Data Source Name:**

2011-2015 CHAS

**Data Source Comments:**

### Discussion:

The majority of households that spend 30-50% of their income on housing costs are White households, making up 58% of the cost burdened households. Because White households make up 66% of the population in this jurisdiction, this is below expected proportions. Even though Black/African Americans only make up 27% of the population in this jurisdiction, Black/African American households account for 34% of cost burdened households. Asian and Hispanic households each have a cost burden percentage proportional to population share.

Black/African American households are even more disproportionately likely to be severely cost burdened, accounting for 40% of the households that pay more than half their income on rent. Asian and Hispanic households each have a severe cost burden percentage proportional to their population share.

## **NA-30 Disproportionately Greater Need: Discussion – 91.205(b)(2)**

**Are there any income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?**

At all income categories, Black/African American households are more likely to have a disproportionately greater need due to housing or severe housing problems. The highest disparity is in the 0-30% AMI range for disproportionately greater need due to housing problems, where Hispanic households have a disproportionately higher need due to housing for incomes ranging from 0-80% of the AMI.

**If they have needs not identified above, what are those needs?**

No other housing needs have been identified for low to moderate income minority households.

**Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?**

According to CPD Maps, Black/African American households who are cost burdened are primarily located in unincorporated Shelby County, primarily in: the northwestern portion of the county near Meeman Shelby State Park; the area south of Millington, west of Bartlett, and north of Memphis; and the southern portion of the county between Memphis, Collierville, and the Mississippi border. Millington also has a medium concentration of Black/African American.

## NA-35 Public Housing – 91.205(b)

### Introduction

The Shelby County Housing Authority was closed in 2012, and all remaining public housing was closed or transferred to a different housing authority. The Millington Housing Authority (MillHA) operates 89 public housing units in the Shelby County jurisdiction.

### Totals in Use

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *

Table 22 - Public Housing by Program Type

\*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Data Source: PIC (PIH Information Center)

### Characteristics of Residents

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	
									Average Annual Income
Average length of stay	0	0	9	0	0	0	0	0	



Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher	
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program
Average Household size	0	0	2	0	0	0	0	0
# Homeless at admission	0	0	4	0	0	0	0	0
# of Elderly Program Participants (>62)	0	0	20	0	0	0	0	0
# of Disabled Families	0	0	15	0	0	0	0	0
# of Families requesting accessibility features	0	0	89	0	0	0	0	0
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

**Table 23 – Characteristics of Public Housing Residents by Program Type**

Data Source: PIC (PIH Information Center)

**Race of Residents**

Program Type									
Race	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	0	25	0	0	0	0	0	0
Black/African American	0	0	62	0	0	0	0	0	0
Asian	0	0	1	0	0	0	0	0	0

Program Type									
Race	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
American Indian/Alaska Native	0	0	0	0	0	0	0	0	0
Pacific Islander	0	0	1	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0	0

\*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

**Table 24 – Race of Public Housing Residents by Program Type**

Data Source: PIC (PIH Information Center)

### Ethnicity of Residents

Program Type									
Ethnicity	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	0	0	0	0	0	0	0	0
Not Hispanic	0	0	89	0	0	0	0	0	0

\*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

**Table 25 – Ethnicity of Public Housing Residents by Program Type**

Data Source: PIC (PIH Information Center)

**Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:**

The greatest need for public housing tenants and applicants is affordable housing. Millington Housing Authority has handicap accessible units, but there are currently no applicants with accessibility needs.

**Most immediate needs of residents of Public Housing and Housing Choice voucher holders**

There are currently 30 applicants on the waiting list for the Millington Housing Authority, and their needs range from one to five bedrooms. There is turnover, but most families are on the waiting list one to two years before receiving public housing.

**How do these needs compare to the housing needs of the population at large**

Consistent with the needs of the population at large, the greatest need for applicants and tenants of public housing is affordable housing.

**Discussion**

Millington Housing Authority is the only public housing in the Urban County, and they have 89 units that are currently all occupied. Some tenants have been in public housing for fifty years, while others stay for only a few years. There is turnover, suggesting that families are able to eventually find affordable housing. Because no current applicants are requesting handicap accessible units, it remains that the greatest need is affordable housing in the area.

## NA-40 Homeless Needs Assessment – 91.205(c)

### Introduction:

The Memphis/Shelby County area has greatly improved resources for homelessness the past six years, with homelessness dropping from 2,076 in 2012 to 1,226 in 2018, according to the Point-in-Time (PIT) Report from the Memphis/Shelby County Continuum of Care (CoC). The CoC attributes this to increased access to Rapid Rehousing rental assistance programs.

While homelessness has decreased overall since 2012, there was a 29.11% increase in the number of unsheltered homeless in Memphis/Shelby County. The CoC suggests that this is due to the increase in the poverty rate in Memphis. One possible explanation for the increase in poverty in the area is due to the labor market in the area consisting of unskilled workers in the warehouse industry, and the lack of efficient public transportation.

Because Memphis and Shelby County are combined into one CoC, it is difficult to estimate the homeless population in Shelby County alone. Virtually all services available to the homeless population are located within the City of Memphis.

### Homeless Needs Assessment

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s) and Child(ren)	511	0	0	0	0	0
Persons in Households with Only Children	8	0	0	0	0	0
Persons in Households with Only Adults	828	79	0	0	0	0
Chronically Homeless Individuals	24	42	0	0	0	0
Chronically Homeless Families	14	0	0	0	0	0

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Veterans	204	9	0	0	0	0
Unaccompanied Child	29	2	0	0	0	0
Persons with HIV	9	0	0	0	0	0

**Table 26 - Homeless Needs Assessment**

**Alternate Data Source Name:**

2017 CoC Homelessness Populations/Subpop. Reports

**Data Source Comments:**

Homeless population has no rural homeless

**If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):**

While data is not available for the length of homelessness for individual populations, there is data available for the length of stay in emergency shelter and transitional housing. This data is relevant since the vast majority of the area’s homeless population is sheltered. 100% of persons in families leave emergency shelters in less than three months, with 60% leaving in a week or less. Persons in families in transitional housing stay longer, with 50% staying for 1-3 months, and 100% having left by 9 months. For individuals, 71% stay in emergency shelters for one month or less, with 100% having left by 12 months. 51% Individuals that stay in transitional housing have left by three months, with 100% having left by 12 months.

Additionally, comparing the above table with data from 2016, the year prior, shows that the number of persons in families with children fell from 548 to 511. The number of chronically homeless individuals fell by 32 individuals, though the number of individuals in chronically homeless

families rose from 6 to 14 persons. The number of homeless veterans fell from 240 to 213 individuals, and the number of unaccompanied youth was halved from 63 to 31.

**Nature and Extent of Homelessness: (Optional)**

<b>Race:</b>	<b>Sheltered:</b>	<b>Unsheltered (optional)</b>
White	274	11
Black or African American	1,031	60
Asian	5	0
American Indian or Alaska Native	3	0
Pacific Islander	0	1
<b>Ethnicity:</b>	<b>Sheltered:</b>	<b>Unsheltered (optional)</b>
Hispanic	16	0
Not Hispanic	1,331	79

Data Source  
Comments:

**Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.**

According to the tables above, there were 511 families with children that were homeless in January 2017, all of which were in shelters.

There is a centralized intake for families with children, operated by Metropolitan Inter-Faith Association (MIFA) that screens, on average, 215 families per month and a total of 2,595 for FY17. These numbers are nearly double that of FY16, and many callers are ineligible due to not being literally homeless. Those who do not meet HUD’s definition of literally homeless receive mediation and other prevention services. Through Rapid Rehousing, the community is housing an all-time high number of families, and these families are not timing out of shelters or returning to shelters.

In 2017, MIFA screened 17,969 households for emergency assistance, and provided homeless prevention assistance such as rent, mortgage, and utility assistance to 3,561 households.

Catholic Charities of West Tennessee operates a Supportive Services for Veteran Families (SSVF) Program that in 2017 served 123 households which contained 136 adults and 45 children.

**Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.**

As shown in the “Nature and Extent of Homelessness” table, the majority of the homeless population is Black/African American, according to the 2017 Continuum of Care estimates. The rate of homelessness for Black/African American individuals is about 4.7 times that of White individuals. No data is given for

the Hispanic homeless population, but the poverty rate for Hispanic individuals was 30.1% in 2017, higher than the poverty rate for Black/African American individuals.

### **Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.**

On January 23, 2018, 1,226 people were counted as being homeless in Memphis/Shelby County. Of those, 1,117 (92%) were in emergency shelter or transitional housing facilities.

Between 2017 and 2018, there was a 29% increase in the number of unsheltered homeless in Memphis/Shelby County. The CoC suggests that this increase was due to the high poverty rate in Memphis, which was 26.9% in 2017. The HUD Fair Market Rent (FMR) for FY19 is \$742 for a one-bedroom. In order to not be cost burdened, an individual would need to make an income of \$26,712 annually to afford the FMR, or \$12.84/hour working full time. The non-family median income in the Memphis MSA is \$30,261. According to the Bureau of Labor Statistics, food service jobs, which make up 8.5% of the labor market, have a median hourly wage of \$9.21.

A cause for concern is the FMR outpacing wage gains. Between 2014 and 2017, the FMR rose by 7.45%, while the median hourly wage rose by 6.48%. While income data is not available yet for 2018, the FMR rose another 6% between 2017 and 2019.

Many people who experience chronic homelessness have mental health and substance use disorders. Alliance Healthcare Services, a local mental health center, operates a program to provide services to chronically homeless individuals. AHS annually serves at least 80 individuals who are housed with permanent supportive housing providers.

### **Discussion:**

Through Rapid Rehousing, the community is housing an all-time high number of families. In 2018, only 11% of those who were placed in permanent supportive housing (PSH) returned to homelessness in 24 months. The CoC states that the most successful form of long-term housing stability is the Housing First Model. Participants move directly into housing from the streets or shelter without preconditions of sobriety or requirement to first attend a treatment program. Applicants are not turned away due to lack of income, poor credit history, criminal history, or past eviction. Intensive services are provided, but not a requirement for housing. Participants will also only be evicted for severe and repeated violations of their lease.

The US Department of Veterans Affairs awarded two local providers, Catholic Charities of West Tennessee and Memphis Area Legal Services, funding to launch a Rapid Rehousing initiative under the Supportive Services for Veteran Families (SSVF) program. The CoC developed a partnership with the TN Department of Child Services, which can pay rental assistance to families whose only barrier to family reunification is a lack of stable housing. Unaccompanied youth are primarily serviced by Porter Leath and



Youth Villages, and OUTMemphis, the latter of which also operates a Rapid Rehousing program for LGBTQ Youth.

However, there remains a lack of free emergency shelter in the area, and there has been a recent reduction in emergency shelter for women unaccompanied by children. In 2017, Room in the Inn, a seasonal program (November – March) that provides emergency shelter to all populations, extended their season for women because of the tremendous need.

In October 2018, Union Mission, Memphis' largest emergency shelter, announced it will be expanding its campus to triple the bed capacity, serve more meals, and provide laundry, health care, education, and other services.

## **NA-45 Non-Homeless Special Needs Assessment - 91.205 (b,d)**

### **Introduction:**

The non-homeless special needs population in Shelby County includes individuals such as the elderly and frail elderly, severe mentally ill, developmentally disabled and the physically disabled. Those that suffer from substance abuse issues, living with HIV/AIDS, and victims of domestic violence are also included in this population. Due to the complexity of these issues, some members of the special needs population have more than one of these issues.

### **Describe the characteristics of special needs populations in your community:**

The 2018 State of Aging in Tennessee states that by 2030, there is an expected 29% increase in the elderly population in Shelby County, and 16% of all residents will be elderly. According to 2016 ACS estimates, 34,930 elderly individuals reside in the Urban County, and approximately 1,771 of those individuals live below the poverty level during the last 12 months.

In 2012, the Plough Foundation produced a report on older adults in Shelby County. 20% of 543 elderly surveyed expressed a need for major home repairs (structural repairs, bathroom modifications, better heating and cooling, installation of emergency response systems, and modifications such as ramps/rails to provide accessibility). In addition to the evident need for housing assistance, this group also needs more information regarding available support services. 25% expressed that they “do not know” where to go for support services information.

According to a 2014 National Alliance on Mental Illness (NAMI) report, the unemployment rate for individuals in Tennessee receiving public mental health services is 79.80%. This high rate of unemployment means a majority of individuals receiving public mental health services are likely unable to provide for housing and require assistance.

The Tennessee Bureau of Investigation reported 77,846 domestic violence offenses in Tennessee in 2017. Assuming the number of domestic violence offenses is proportional to population, there are an estimated 3,342 offenses in Shelby County in 2017. Due to domestic violence being underreported, this figure is likely not representative of all domestic violence offenses in Shelby County.

### **What are the housing and supportive service needs of these populations and how are these needs determined?**

For the elderly and frail elderly, physically disabled and the developmentally disabled, these populations may need in-home accommodations to live comfortably. Such accommodations for the physically disabled include: wheelchair ramps both exterior and interior and in extreme cases provided a wheelchair lift; widened doors; lowered light switches and thermostats; provided tub rails; installed accessible toilets; changed vanity cabinets to wall hung sinks; lowered mirrors; modified cabinets;

lowered closet runs; replaced carpet with vinyl; eliminated bathtubs and put in assessable showers; replaced door knobs with lever handles; and provided keyless entries.

Through SCDH's Housing Rehabilitation Program, these in-home needs have primarily been determined on a case-by-case basis based upon evaluation of the unit and consultation with the homeowner by the assigned SCDH Site Inspector.

The Shelby County Crime Victims Center has expressed a significant need for emergency shelter in the community for victims of violence, in particular victims of domestic and family violence. They are currently working with the Community Alliance for the Homeless to create a more coordinated entry process for victims to obtain emergency shelter.

**Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:**

As of December 31, 2016, there were 7,426 persons living with HIV/AIDS (PLWHA) within the Memphis MSA, an increase of 311 people from the prior year. According to the 2018 annual PIT count, there were 76 PLWHA that were in temporary housing or emergency shelters, and one unsheltered individual.

According to the 2015 Comprehensive Needs Assessment for the Memphis Transitional Grant Area (TGA) Ryan White Program, almost 68% of PLWHA in the Memphis MSA are male. The majority are non-Hispanic Black (82%), followed by non-Hispanic White (13%) and 3% Hispanic/Latino. Almost 47% of PLWHA were 45 years of age or older by the end of 2014. In the Memphis TGA, 5% (194) Ryan White clients were documented to be non-permanently housed in 2014.

**Discussion:**

Shelby County Department of Housing recognizes that there are special needs populations in its jurisdiction. SCDH does not receive funding to directly help the special needs population. We rely on outside organizations that directly help those with special needs to refer those needing assistance in the way of housing rehabilitation or down-payment assistance.

The SCDH will continue to provide housing rehabilitation to any persons that meet the guidelines, as well as down-payment assistance for persons who qualify.

As the population of Shelby County ages, we continue to be attentive to the needs of the elderly population in our jurisdiction and provide safe housing to those in need.

The Division of Alcohol and Drug Abuse Services, or the Tennessee Department of Mental Health and Developmental Disabilities serves as the single state authority for receiving and administering federal block grant funding from the U.S. Department of Health and Human Services, Substance Abuse and Mental Health Services Administration.

## **NA-50 Non-Housing Community Development Needs – 91.215 (f)**

### **Describe the jurisdiction’s need for Public Facilities:**

Within the Urban County there is a need for walking trails, accessible playgrounds, outdoor recreational facilities for seniors, fire stations/equipment, and parks/recreational facilities for children and neighborhood facilities. Specifically, there is a need for parks or trails in Bartlett and as well as pickle ball/tennis court in Lakeland. These facilities will be an enhancement to the respective municipality and jurisdiction at large by providing safe places for citizens, particularly the youth, seniors, and families with children, to congregate.

### **How were these needs determined?**

The previously detailed needs were determined by consulting with the town managers, planners, or city engineers of the various municipalities that make up the Urban County. Each representative was asked to consider their respective community development needs in terms of public facilities. Based on the expressed priorities from the municipalities, general as well as specific needs throughout the jurisdiction were identified. Additionally, a public hearing (described in PR-15 Citizen Participation) was held on January 31, 2019 in an effort to solicit citizen input on community development needs.

### **Describe the jurisdiction’s need for Public Improvements:**

Within the Urban County there is a need for sidewalk improvements, flood drain improvements, water/sewer improvements, and street improvements. Specifically, there is a need for park improvements including ADA compliant improvements in Bartlett and Lakeland, various sidewalk, doors to public buildings, and ADA ramp improvements in Collierville, Millington, and Arlington, and flood drainage improvements in Unincorporated Shelby County, Millington, and Collierville.

### **How were these needs determined?**

The previously detailed needs were determined by consulting with the town managers, planners, or city engineers of the various municipalities that make up the Urban County. Each representative was asked to consider their respective community development needs in terms of public facilities. Based on the expressed priorities from the municipalities, general as well as specific needs throughout the jurisdiction were identified. Additionally, a public hearing (described in PR-15 Citizen Participation) was held on January 31, 2019 in an effort to solicit citizen input on community development needs.

### **Describe the jurisdiction’s need for Public Services:**

Within the Urban County there is a need for senior citizen services, handicapped services, transportation services, legal services, crime awareness and prevention services, health services, and employment training. Of the studies that were used to describe the homeless and non-homeless special needs populations, better access to resource information was a common conclusion. In addition to resource

information services, homeless services are also needed as the majority of these types of services are located outside of the Urban County in the City of Memphis.

### **How were these needs determined?**

The previously detailed needs were determined by consulting with the town managers, planners, or city engineers of the various municipalities that make up the Urban County. Each representative was asked to consider their respective community development needs in terms of public services. Based on the expressed priorities from the municipalities, general needs throughout the jurisdiction were identified. Also, based on the data regarding the jurisdiction's homeless and non-homeless special needs populations, homeless services and resource information services were identified as public service needs. A public hearing (described in PR-15 Citizen Participation) was held on January 31, 2019 in an effort to solicit citizen input on community development needs.

# Housing Market Analysis

## MA-05 Overview

### Housing Market Analysis Overview:

In Shelby County from 1970 to 2017, the largest increase in housing units occurred in the Urban County outside the city of Memphis. The 1970s and 1980s saw the largest increase in the housing supply in the Urban County, with a growth of 221% from 1970 to 1990. Meanwhile, the Memphis housing stock began to stagnate, with 23.5% growth from 1970 to 1980, and only 1.7% growth from 1980 to 1990, as the population in the city migrated towards suburban municipalities.

The housing supply in the Urban County increased 34.3% from 1990 to 2010, while the Memphis housing supply grew 17.4%, though much of this growth was likely attributable to annexation of suburban areas and an influx of new development during the housing bubble. Since 2010, the supply of new housing has dramatically slowed in the city and county, with the Urban County experiencing a 4.60% increase in the number of housing units. Memphis' housing supply grew 0.77% due to a lack of demand from a decreasing population and surplus of housing from the prior decade, and recent de-annexation of suburban municipalities. The vast majority of the housing stock in the Urban County is one unit, detached homes, with most having three or more bedrooms.

While home values have remained stagnant the past seven years, rental prices have dramatically increased by 19%, far outpacing the median household income increase of 8% over the same time period. There has been a 7% increase in the number of renters over the past five years, with renters now making up 23% of all households. There is also a lack of affordable housing for the lowest income levels.

ACS data indicates that nearly a quarter of all housing units in the Urban County have some housing condition issue. The age of the housing stock in the Urban County was predominantly built after 1980, with about 23% of the housing stock being more than 37 years old. Households with multiple housing conditions are concentrated in the community of Northaven in Unincorporated Shelby County, Germantown between Poplar Pike and Farmington Blvd, and the area of Collierville south of the railroad tracks. The majority of the housing stock with multiple housing conditions was built before 1980.

After the closing of the Shelby County Housing Authority in 2012, there is only one public housing authority operating in the Shelby Urban Entitlement Area.

As stated in the Needs Assessment, the homeless population of the Urban County primarily seeks services in the City of Memphis, as the vast majority of the homeless facilities and services are located there. It is challenging to identify the homeless population exclusively within the Urban County, so when addressing the number of homeless, the homeless population is addressed in terms of the Memphis and Shelby County area.

Community Alliance for the Homeless is the lead agency of the Memphis/Shelby County Continuum of Care, and works in partnership with numerous mainstream service providers to manage facilities and services for persons who are homeless.

According to data gathered from PolicyMap, about of 4% of renter households in the Urban County have two or more housing problems, compared to 0.4% of home-owning households in the county. These households are primarily concentrated in Bartlett, where 37.29% of renters in one tract have multiple housing problems; Germantown surrounding Poplar Ave near Poplar Pike and Farmington Blvd, where 23% of renters with multiple housing problems; Collierville south of Poplar Avenue, where 12.26% of renters have multiple housing problems; and unincorporated Shelby County including Northaven, where 10.07% of renters have multiple housing problems.

## MA-10 Number of Housing Units – 91.210(a)&(b)(2)

### Introduction

In Shelby County from 1970 to 2017, the largest increase in housing units occurred in the Urban County outside the city of Memphis. The 1970s and 1980s saw the largest increase in the housing supply in the Urban County, with a growth of 221% from 1970 to 1990. Meanwhile, the Memphis housing stock began to stagnate, with 23.5% growth from 1970 to 1980, and only 1.7% growth from 1980 to 1990, as the population in the city migrated towards suburban municipalities.

The housing supply in the Urban County increased 34.3% from 1990 to 2010, while the Memphis housing supply grew 17.4%, though much of this growth was likely attributable to annexation of suburban areas and an influx of new development during the housing bubble. Since 2010, the supply of new housing has dramatically slowed in the city and county, with the Urban County experiencing a 4.60% increase in the number of housing units. Memphis' housing supply grew 0.77% due to a lack of demand from a decreasing population and surplus of housing from the prior decade, and recent de-annexation of suburban municipalities. The vast majority of the housing stock in the Urban County is one unit, detached homes, with most having three or more bedrooms.

### All residential properties by number of units

Property Type	Number	%
1-unit detached structure	89,064	85%
1-unit, attached structure	3,144	3%
2-4 units	3,012	3%
5-19 units	6,561	6%
20 or more units	2,174	2%
Mobile Home, boat, RV, van, etc.	941	1%
<b>Total</b>	<b>104,896</b>	<b>100%</b>

Table 27 – Residential Properties by Unit Number

Alternate Data Source Name:  
2013-2017 ACS 5 Year Estimates  
Data Source Comments:

### Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	246	0%	649	3%
1 bedroom	496	0%	5,895	28%
2 bedrooms	5,414	7%	12,689	59%
3 or more bedrooms	148,389	192%	23,505	110%
<b>Total</b>	<b>154,545</b>	<b>199%</b>	<b>42,738</b>	<b>200%</b>

Table 28 – Unit Size by Tenure



**Alternate Data Source Name:**  
2013-2017 ACS 5 Year Estimates  
**Data Source Comments:**

**Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.**

There are approximately 613 housing units in the Urban County that are assisted with the Housing Choice Voucher. These units are mainly concentrated in unincorporated Shelby County near Millington, Bartlett, Collierville, and Shelby Forest State Park. There is one HUD Multifamily property located in Millington that has 80 housing units available to elderly low-income persons. According to the Tennessee Housing Development Agency, there is one LIHTC property in the Urban County, located in Arlington, which has 32 units, and whose LIHTC contract is set to expire in 2020.

The Millington Housing Authority (MillHA) is the only Housing Authority operating in the Urban County, and its operations are funded through HUD public housing subsidies and tenant rents. As discussed in the Needs Assessment, this Housing Authority operates a total of 89 units, all of which are occupied. The average annual income of those living in MillHA public housing is \$14,500 and their stays range from a few months to nine years.

Shelby County, in collaboration with the Tennessee Housing Development Agency (THDA) provided \$227,349 in DPA loans to assist 68 low- and moderate-income homebuyers during PY 2017. From July 1, 2014 to December 31, 2018, SCDH completed and cleared 115 units under the Housing Rehabilitation program. From July 1, 2014 to December 31, 2018, 226 units were completed under the Lead Hazard Control Program, for a total of 341 units completed and cleared. SCDH expended all NSP funds allocated within 18 months of receiving, closing out the grant in November 2018.

**Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.**

Tennessee Housing Development Agency's (THDA) 2016 report "Aging Affordable Rental Housing in Tennessee & the Need for Preservation," stated that the majority of affordable housing properties were built more than 15 years ago, or more than 30 years ago in the case of public housing, and have significantly deferred maintenance due to reductions in funding. The LIHTC program has not received the same budget cuts, and is a significant source for the preservation of existing properties. However, the demand for rental housing and new production is increasing, creating a challenge of how to fund preservation of existing stock while meeting the increasing demand for new affordable housing.

The one public housing unit located in the Urban County, run by the MillHA, has had extensive revitalization and maintenance since 2008 and no units are expected to be lost in the near future.

The one active LIHTC property, located in Arlington, was placed into the LIHTC program in 1990 and originally had its contract expire in 2005. The property received a 15 year extension, and the extended use period will end in 2020. Unless additional LIHTC is constructed or acquired, there will be no active LIHTC properties after 2020.

According to 2013-2017 ACS estimates, the majority of homes (91%) in the Shelby County jurisdiction were built after 1969. Of 104,896 estimated homes, 9,688 housing units were built prior to 1970. There is a potential for older housing units to be lost due to age and poor upkeep.

### **Does the availability of housing units meet the needs of the population?**

The availability of housing units does not completely meet the needs of the Shelby County population, specifically in terms of affordability. The MillHA currently has a waiting list of 30 applicants, and most families are on the waiting list one to two years before receiving public housing. According to 2011-2015 CHAS data, there are 22,730 households that bear a cost burden of 30% or greater. CHAS data also indicates that the majority (58%) of households that are cost burdened are low-to moderate-income households. There are more homeowners that are cost burdened than renters, but a greater percentage of renters are cost burdened. Overcrowding is also a common problem in low-income households. Specifically, small-related family households are most impacted by the issues of cost burden and overcrowding. It can be concluded that housing affordability is the most pressing housing need in the Shelby County jurisdiction and there is a lack of affordable housing for low-to moderate-income families.

Additionally, the Urban County has grown 5.32% in the past seven years, yet the housing stock has grown only 4.60%, causing a tightening of the housing market, which can cause housing prices to increase.

### **Describe the need for specific types of housing:**

Due to the limited amount of public housing, 89 units run by Millington Housing Authority that are all occupied, the expiration of the last LIHTC contract in the Urban County, and the high rate of cost burdenship for low-income households, it can be concluded that there is a pressing need for affordable housing units for renters and owners. The population in the Urban County has also grown at a faster rate than the construction of new housing units, which can cause prices to rise further unless new housing is created.

When considering the homeless and non-homeless special needs population, there is a need for transitional housing, emergency shelters, safe-houses, and homes with accessibility accommodations for the physically disabled and frail elderly.

## **Discussion**

The most pressing housing issue in Shelby County is affordability. Although the number of housing units in Shelby County is greater than the number of households, this surplus is shrinking, and there is a need for affordable housing options that are available for the various income levels, particularly for the extremely low- and low-income households. Housing options specifically for the homeless, former homeless and non-homeless special needs populations are also needed.

## MA-15 Housing Market Analysis: Cost of Housing - 91.210(a)

### Introduction

While home values have remained stagnant the past seven years, rental prices have dramatically increased by 19%, far outpacing the median household income increase of 8% over the same time period. There has been a 7% increase in the number of renters over the past five years, with renters now making up 23% of all households. There is also a lack of affordable housing for the lowest income levels.

### Cost of Housing

	Base Year: 2010	Most Recent Year: 2017	% Change
Median Home Value	198,452	200,256	1%
Median Contract Rent	739	882	19%

Table 29 – Cost of Housing

**Alternate Data Source Name:**

2006-2010, 2013-2017 ACS

**Data Source Comments:**

Rent Paid	Number	%
Less than \$500	242	14.0%
\$500-999	6,087	51.5%
\$1,000-1,499	9,912	26.2%
\$1,500-1,999	6,507	4.6%
\$2,000 or more	1,403	3.8%
<b>Total</b>	<b>24,151</b>	<b>100.0%</b>

Table 30 - Rent Paid

**Alternate Data Source Name:**

2013-2017 ACS 5 Year Estimates

**Data Source Comments:**

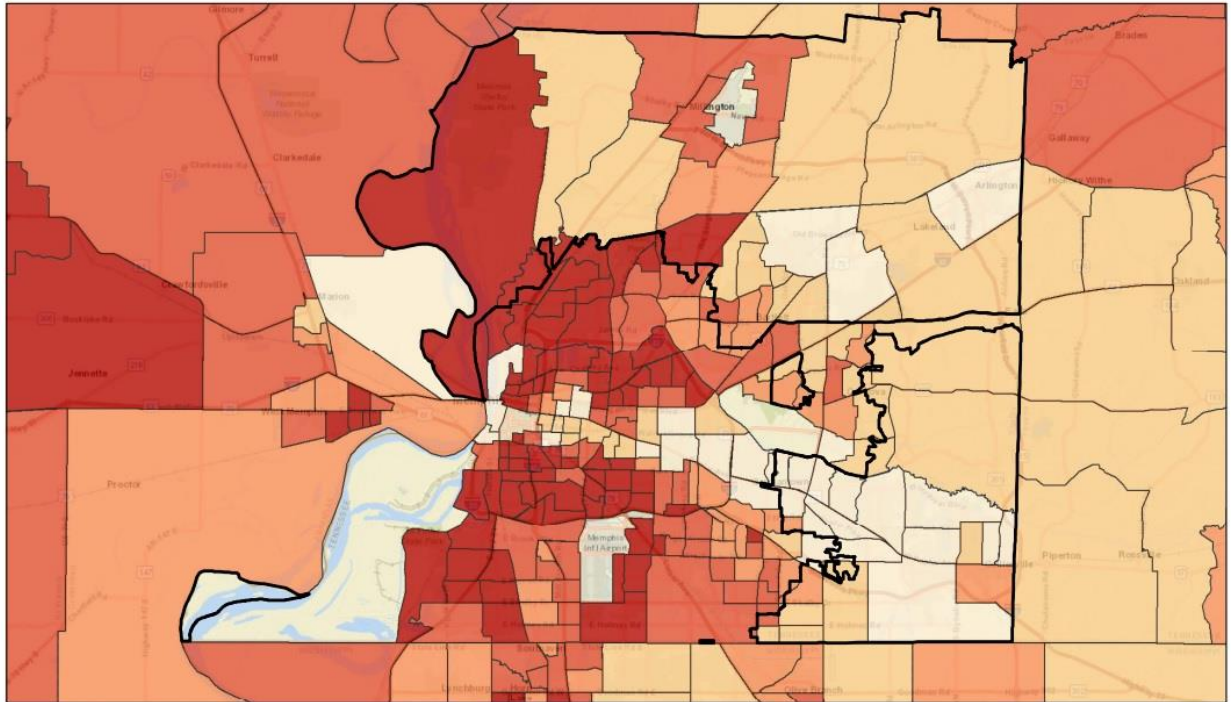
### Housing Affordability

% Units affordable to Households earning	Renter	Owner
30% HAMFI	370	No Data
50% HAMFI	1,472	1,783
80% HAMFI	6,506	7,007
100% HAMFI	No Data	13,265
<b>Total</b>	<b>8,348</b>	<b>22,055</b>

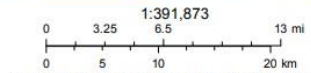
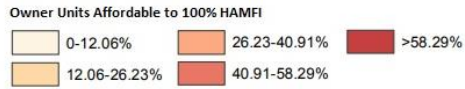
Table 31 – Housing Affordability

Data Source: 2009-2013 CHAS

Affordable Owner Units - Shelby County CBDG



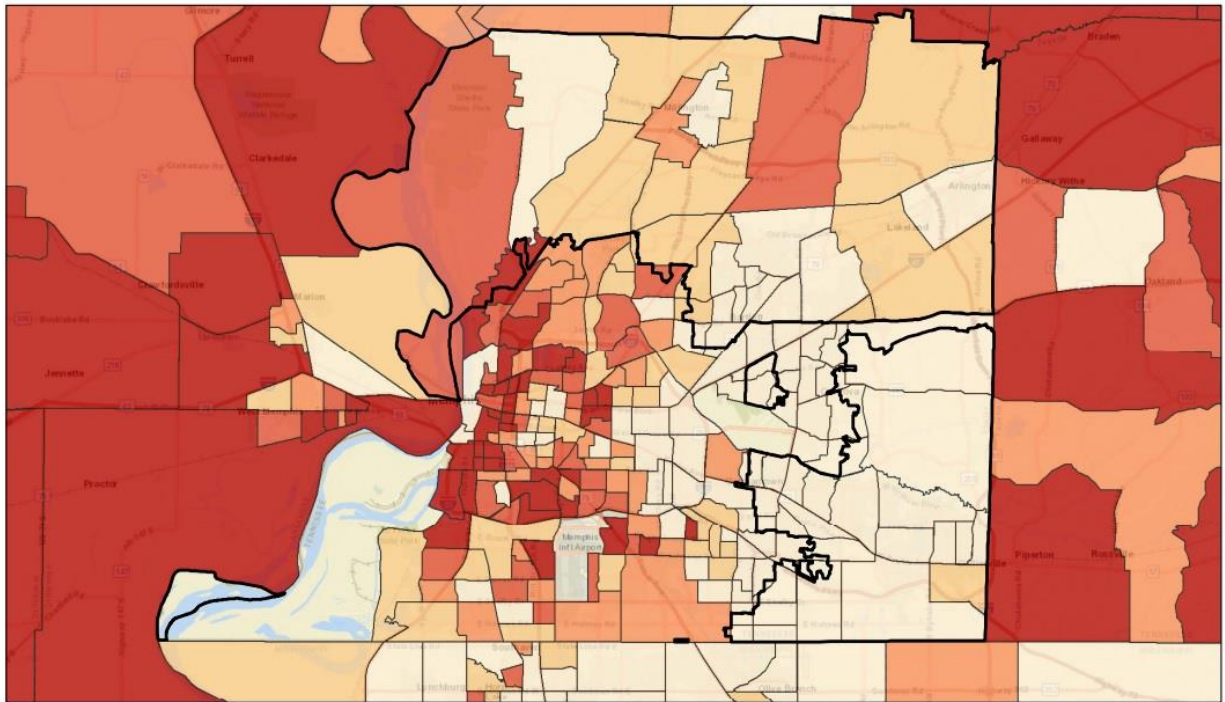
April 23, 2019



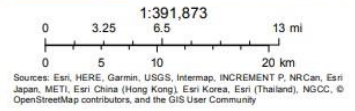
Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, © OpenStreetMap contributors, and the GIS User Community

CPD Map- Affordable Owner Units

### Affordable Renter Units - Shelby County CBDG

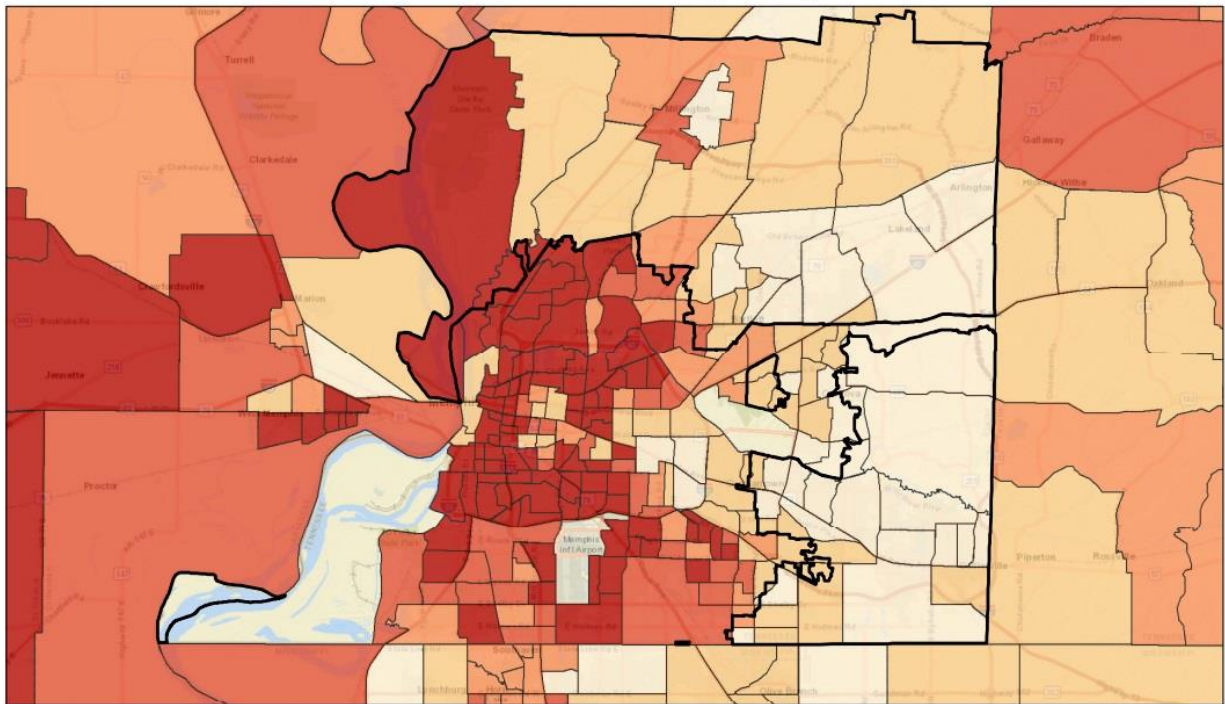


April 23, 2019



### CPD Map- Affordable Renter Units

### Low Income Households - Shelby County CBDG



April 23, 2019



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

### CPD Map- Low Income Households

### Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	631	707	835	1,137	1,331
High HOME Rent	631	707	835	1,105	1,214
Low HOME Rent	526	563	676	781	872

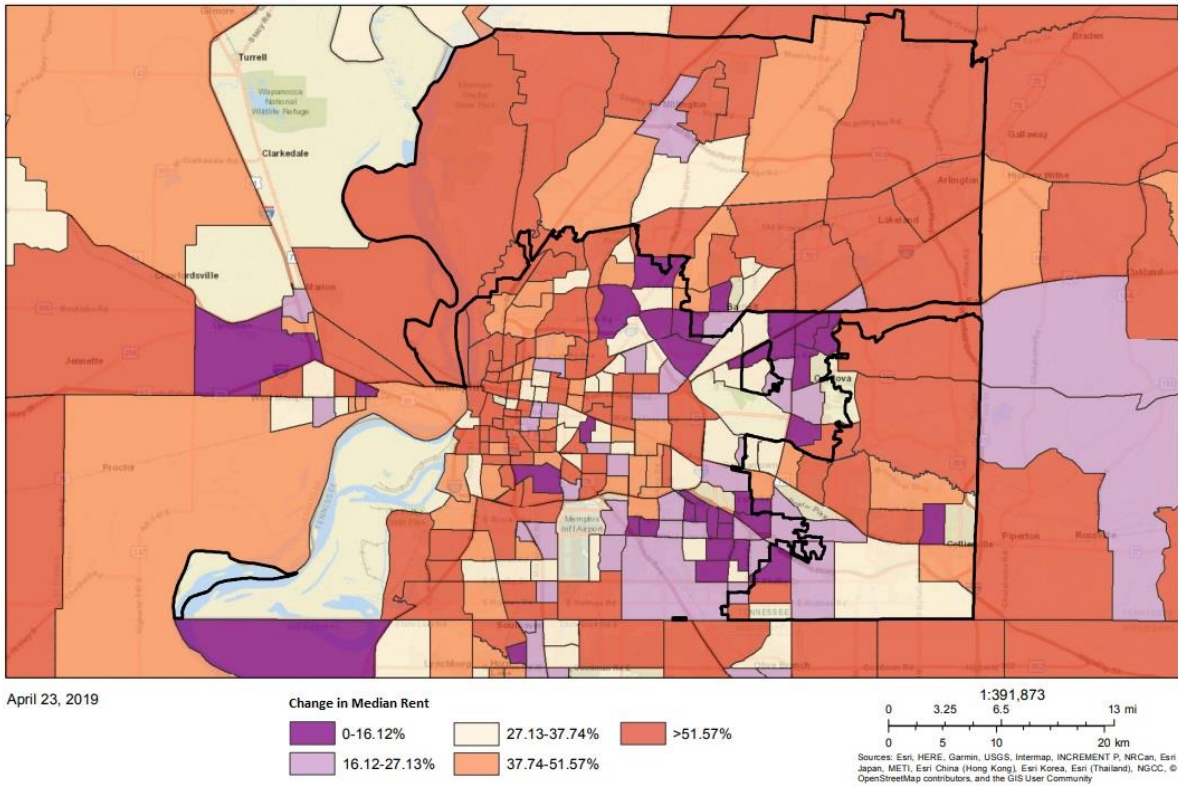
**Table 32 – Monthly Rent**

**Alternate Data Source Name:**

2017 HUD FMR and HOME Rents, Memphis, TN-MS-AR

**Data Source Comments:**

### Change in Median Rent 2000 to 2010 - Shelby County CBDG



### CPD Map- Change in Median Rent

#### Is there sufficient housing for households at all income levels?

According to 2009-2013 CHAS data, there is not sufficient housing for households in the 0-30% or 30-50% ranges. There are 4,445 families in the 0-30% HAMFI range, but CHAS data indicates there are only 370 rental units available for households in this range. No CHAS data is available on owner housing units that are affordable to this income level.

The Millington Housing Authority’s waiting list is also an indicator that there is insufficient housing for extremely low-income households. The MillHA oversees 89 units and there are currently 30 families on the waiting list that can wait from three months to seven years for an available unit. As this is the only public housing authority in the Urban County jurisdiction, this likely heightens the need for affordable housing options for extremely low-income households.

CHAS data indicates that there are 4,900 families in the 30%-50% HAMFI range yet there are only 3,255 affordable renter or owner housing units available. The lack of affordable housing for these two income ranges can help explain why many of these households are severely cost burdened; lack of affordable housing drives these households to housing options that are not affordable for low-income persons.



## **How is affordability of housing likely to change considering changes to home values and/or rents?**

Housing affordability is likely to worsen in the near future, mostly due to drastically increasing rental prices. While median home values have remained relatively stagnant from 2010 to 2017, median contract rent has increased nearly 19.26% in the seven year period, far outpacing the 8% increase in median household income over the same time period. Home values have remained stagnant over the past seven years, making owning a home more affordable, yet because the number of renters has increased at a faster rate than the increase in the housing stock, it can be assumed that fewer houses are available to purchase.

## **How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?**

Median Contract Rent in Shelby County is above the Fair Market Rent rate for a 1-2 bedroom apartment as well as the most affordable apartment, an efficiency unit. The Median Contract Rent is also higher than the Low HOME Rent rates for an efficiency to a 2 bedroom apartment in Shelby County. To afford an apartment, a household would have to pay a Fair Market Rent or Low HOME Rent well above the median area rent. In 2017, the Median Contract Rent was \$251 higher than the Fair Market Rent for an efficiency, and \$356 higher than the Low HOME Rent. For a one bedroom, the Median Contract Rent was \$175 and \$319 higher than the Fair Market Rent and Low HOME Rent, respectively. Within the Urban County, renters account for 23% of all households, an increase of 7% over the past five years. SCDH does not provide HOME funding for rental housing development.

## **Discussion**

Based on the data regarding housing costs, it can be concluded that affordable housing for low-income persons is needed within the Urban County. Extremely low-and low-income households are most affected by the current area median costs of housing. Median rental costs are far outpacing income gains, and an increasing number of households in the Urban County are renters, making up nearly a quarter of households.

## MA-20 Housing Market Analysis: Condition of Housing – 91.210(a)

### Introduction

ACS data indicates that nearly a quarter of all housing units in the Urban County have some housing condition issue. The age of the housing stock in the Urban County was predominantly built after 1980, with about 23% of the housing stock being more than 37 years old. Households with multiple housing conditions are concentrated in the community of Northaven in Unincorporated Shelby County, Germantown between Poplar Pike and Farmington Blvd, and the area of Collierville south of the railroad tracks. The majority of the housing stock with multiple housing conditions was built before 1980.

### Definitions

Substandard condition: A dwelling unit characterized by non-compliance with acceptable housing and building code standards.

Substandard condition but suitable for rehabilitation: a dwelling that is not deteriorated beyond repair and/or if the costs of rehabilitation would not exceed 50% of the estimated appraised value of the property.

### Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	14,048	18%	8,097	36%
With two selected Conditions	99	0%	546	2%
With three selected Conditions	48	0%	45	0%
With four selected Conditions	0	0%	0	0%
No selected Conditions	62,188	81%	13,877	61%
<b>Total</b>	<b>76,383</b>	<b>99%</b>	<b>22,565</b>	<b>99%</b>

Table 33 - Condition of Units

Alternate Data Source Name:  
2013-2017 ACS 5 Year Estimates  
Data Source Comments:

## Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	23,309	31%	8,327	37%
1980-1999	36,028	47%	8,558	38%
1950-1979	15,394	20%	5,038	22%
Before 1950	1,652	2%	642	3%
<b>Total</b>	<b>76,383</b>	<b>100%</b>	<b>22,565</b>	<b>100%</b>

**Table 34 – Year Unit Built**

Alternate Data Source Name:  
2013-2017 ACS 5 Year Estimates  
Data Source Comments:

## Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	17,046	22%	5,680	25%
Housing Units build before 1980 with children present	1,930	3%	1,250	6%

**Table 35 – Risk of Lead-Based Paint**

Alternate Data Source Name:  
2013-2017 ACS (Total Units), 2011-2015 CHAS (Units)  
Data Source Comments:

## Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units	1,892	1	1,893
Abandoned Vacant Units	0	0	0
REO Properties	4,432	1	4,433
Abandoned REO Properties	2	0	2

**Table 36 - Vacant Units**

Alternate Data Source Name:  
Neighborhood Preservation, Inc. (NPI Memphis)  
Data Source Comments:

## Need for Owner and Rental Rehabilitation

According to 2013-2017 ACS data, 14,195 owner occupied units, 19% of all owner-occupied units, have at least one housing problem and 8,688 renter-occupied units, 39% all of renter-occupied units, have at least one housing problem. These problems may include the lack of a complete kitchen or complete plumbing, severe overcrowding or severe cost burdening. Over the past five years, the number of

owner-occupied units with at least one housing problem has decreased by 2,647 units, yet the number of renter-occupied units with at least one housing problem has increased by 3,279 units.

Data was gathered by Neighborhood Preservation, Inc., who used tax records, MLGW data, and city code enforcement data to determine the number of vacant units in the Urban County. There are 1,892 vacant units, only one of which is not suitable for rehabilitation. In addition, nearly all vacant REO properties are suitable for rehabilitation.

### **Estimated Number of Housing Units Occupied by Low or Moderate Income Families with LBP Hazards**

All housing units built before 1980 are counted herein as potentially having lead-based paint hazards, because 1978 was the first year Federal law prohibited lead in residential paint. Housing age is available in increments of ten year time periods through 1990. As not all supplies of lead-based paint were used up immediately after enactment of the ban, there will be instances wherein paint with lead was used in houses built shortly after the ban. Thus, in order to develop a conservative estimate of the of housing units that contain lead-based paint hazards, houses built through 1979 are counted.

An estimated 22,726 of the 98,948 housing units (23%) in the Shelby County Urban Entitlement Area potentially have lead-based paint hazards. CHAS data indicates that 3,180 housing units built before 1980 have children present.

According to CHAS data, 20,720 of the Entitlement Area's households have been categorized as low- and moderate-income individuals (including extremely low-income). These individuals are evenly dispersed throughout the entitlement area, with only 2 census tracts having concentrations of low- and moderate-income individuals composing more than 50% of its total population.

If it is assumed households occupy a share of the Urban Entitlement Area's housing units by age of housing stock proportional to their population, then as many as 4,832 pre-1980 housing units could be reasoned to be occupied by extremely low-, low-, and moderate-income families. This number may be even higher, since extremely low-, low-, and moderate-income families may be more likely to occupy older housing stock than families with greater means.

### **Discussion**

Rental units are more likely to have one or more housing issues than owner-occupied units. While owner-occupied units make up the majority of homes at need for rehabilitations, the number of rental units needing assistance has largely grown over the past five years.

## MA-25 Public and Assisted Housing – 91.210(b)

### Introduction

After the closing of the Shelby County Housing Authority in 2012, there is only one public housing authority operating in the Shelby Urban Entitlement Area. As previously mentioned, the MillHA manages and operates Bill Knight and Greenhill Gardens developments. Both developments were constructed around 1960. A Shelby County Sheriff’s Office substation is located within the two developments. The MillHA consists of 89 units and has an annual budget of \$400,000. It is governed by a five-member Board of Commissioners that is appointed by the Mayor of Millington and approved by Millington’s Board of Alderman to serve five-year terms. The MillHA has a Resident Advisory Board that meets once a year. The Millington Housing Authority has a staff that includes an Executive Director and operates independently of Shelby County Government.

In 2017, MillHA received an inspection score of 93% and has continued to be a High Performer. MillHA operations are funded through HUD public housing subsidies and tenant rents.

### Totals Number of Units

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project -based	Tenant -based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available			90						
# of accessible units									
<b>*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition</b>									

**Table 37 – Total Number of Units by Program Type**

Data Source: PIC (PIH Information Center)

**Describe the supply of public housing developments:**

**Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:**

There is only one public housing development in the Urban County with 89 units.

## Public Housing Condition

Public Housing Development	Average Inspection Score
Bill Knight Gardens Development	93
Greenhill Gardens Development	93

Table 38 - Public Housing Condition

### Describe the restoration and revitalization needs of public housing units in the jurisdiction:

Millington Housing Authority incurred major revitalization of its housing units within the past decade, and as such there are no pressing restoration or revitalization needs. Within the past five years, MillHA has spent approximately \$300,000 on improvements such as installing security doors, metal awnings, wet wells, and downspouts, painting raw iron, and planting around 100 trees.

### Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing:

The Millington Housing Authority is dedicated to improving the living environment of its tenants by having regular meetings with the Resident Advisory Board and considering its input for renovation needs and potential improvements. The MillHA has done significant renovations since 2008 to maintain the housing units and to ensure that residents live in standard and secure housing. MillHA refers residents in need of assistance to services such as the Millington Library, the Parks and Recreation department, or the Crisis Center.

### Discussion:

When the Shelby County Housing Authority closed in 2012, the amount of available public housing units decreased by 175 units. Currently, the Millington Housing Authority manages and operates 89 housing units in its two developments, serving 241 individuals. A small and high performing Public Housing Authority, the MillHA operates independently of Shelby County Government. It is not anticipated that any additional public housing units will be lost from the inventory during the 5 Year Strategy period. Shelby County Department of Housing is committed to providing technical assistance to Millington Housing Authorities as needed.

## **MA-30 Homeless Facilities and Services – 91.210(c)**

### **Introduction**

As stated in the Needs Assessment, the homeless population of the Urban County primarily seeks services in the City of Memphis, as the vast majority of the homeless facilities and services are located there. It is challenging to identify the homeless population exclusively within the Urban County, so when addressing the number of homeless, the homeless population is addressed in terms of the Memphis and Shelby County area.

Community Alliance for the Homeless is the lead agency of the Memphis/Shelby County Continuum of Care, and works in partnership with numerous mainstream service providers to manage facilities and services for persons who are homeless.

The Continuum coordinates a broad array of services that includes, but is not limited to:

- Needs Identification
- Prevention of Homelessness
- Emergency Shelter/Services
- Day Services
- Transitional Housing
- Support Services
- Rapid Rehousing
- Permanent Housing
- Outreach



**Facilities and Housing Targeted to Homeless Households**

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	170	0	330	524	0
Households with Only Adults	291	239	308	842	0
Chronically Homeless Households	0	0	0	743	0
Veterans	0	0	174	596	0
Unaccompanied Youth	4	0	0	0	0

**Table 39 - Facilities and Housing Targeted to Homeless Households**

**Alternate Data Source Name:**

HUD's 2018 CoC Homeless Assistance Programs

**Data Source Comments:**

Provider Organization	Shelter	Transitional Housing	Mortgage Assistance	Rental Assistance	Utilities Assistance	Counseling/Advocacy	Street Outreach	Mobile Clinic	Law Enforcement	Case Management	Life Skills	Alcohol & Drug	Mental Health	Healthcare	HIV/AIDS	Education	Employment Services	Childcare	Transportation	Food Services
Agape Child and Family Services	x				x						x	x			x	x	x			
Alpha Omega Veterans Services	x				x		x					x								x
Barron Heights		x			x							x					x			
Behavioral Health Initiatives					x							x								
Bridges											x									x
Burrito Ministry							x													x
Calvary Rescue Mission	x																			x
Case Management, Inc				x	x					x		x								x
Catholic Charities of West TN	x			x								x								x
Christ Community Clinic/Baptist								x						x						
School of Nursing																				
Cocaine and Alcohol Awareness Program, Inc											x	x	x	x	x					
Community Legal Clinic						x														
Door of Hope	x				x						x	x	x							x
Dorothy Day House		x									x						x	x		
First Congo																				x
Alliance Healthcare Services										x		x								
Friends for Life				x	x	x				x	x	x	x				x			
Grace House											x									
Health Care for the Homeless/Memphis Health Center										x		x	x	x						
HER Faith Ministries	x																			x
HopeWorks										x	x									x
Hospitality Hub										x	x									x
Karat Place		x																		
LeMoyn Owen College																				
Lighthouse Ministries		x			x					x		x				x				x
Living for Christ	x																			x
Lowenstein House																				
Memphis Area Legal Services																				
Memphis Area Legal Services						x														
Memphis Area Transportation Agency (MATA)																				x
Memphis Mental Health Institute																				
Memphis Police Departments (MPD)										x										
Memphis Recovery Center																				
Memphis Union Mission	x				x						x	x	x	x						x
MIFA					x	x					x									x
MPD Crisis Intervention Team (CIT)										x										x
OUTMemphis	x																			x
Porter Leath	x																			x
Regional Medical Center																				
Salvation Army	x																			x
Safe Harbor of Memphis																				x
Serenity Recovery Center	x																			x
Serenity Recovery Center																				
Shelby County Sheriff's Office										x										
SHIELD Inc.	x			x	x															x
Southwest Community College																				
Synergy Treatment Center						x														x
Tennessee Mental Health Consumers' Association						x														
TN State Dept. of Human Services																				
Trinity Community Coalition										x	x									x
Outreach																				
University of Memphis																				
Warriors Center		x																		
Workforce Investment Agency's Career Center																				
YWCA	x																			

Table 1—Provider Organizations

Provider Name	Facility Name(s)	Type of Housing Offered
Missionaries of Charity	Emergency Shelter	Emergency Shelter for Mixed Populations
YWMC	Abused Women's Shelter	Emergency Shelter for Mixed Populations
Burrito Ministry	Shelter	Emergency Shelter for Adult Individuals
Calvary Rescue Mission	Emergency Shelter	Emergency Shelter for Adult Individuals
Living for Christ	Restoration House	Emergency Shelter for Adult Individuals
Memphis Union Mission	Men's Shelter, Opportunity Center	Emergency Shelter for Adult Individuals
Peabody House	Emergency Shelter	Emergency Shelter for Adult Individuals
Salvation Army	Single Women's Lodge	Emergency Shelter for Adult Individuals
Trinity Community Coalition Outreach	Emergency Shelter	Emergency Shelter for Adult Individuals
Porter Leath	Youth Program	Emergency Shelter for Youth (Under 18 Yrs.)
OUTMemphis	Youth Emergency Shelter	Emergency Shelter for Youth (Under 18 Yrs.)
Youth Villages	Family Link/Safe Place	Emergency Shelter for Youth (Under 18 Yrs.)
Catholic Charities	Sophia's House	Transitional Housing for Families
HER Faith Ministries	HER House	Transitional Housing for Families
Memphis Family Shelter	Family Shelter	Transitional Housing for Families
Memphis Union Mission	Intact Families	Transitional Housing for Families
MIFA	Estival Comm., Satellite Housing	Transitional Housing for Families
Salvation Army	Renewal Place, New Directions	Transitional Housing for Families
Agape Child & Family Services Inc.	F.I.T. Program, F.I.T Bent Tree Edition	Transitional Housing for Mixed Populations
Memphis Union Mission	Moriah House	Transitional Housing for Mixed Populations
S.W.I.M. Ministries	Transitional House	Transitional Housing for Mixed Populations
Alpha Omega Veterans Services	Transitional Progress House, GPD Transitional Supportive, GPD Veterans Life House	Transitional Housing for Adult Individuals
Barron Heights Community Development	GPD Barron Heights	Transitional Housing for Adult Individuals
Calvary Rescue Mission	Transitional Living	Transitional Housing for Adult Individuals
Cocaine and Alcohol Awareness Program	GPD V.A. Program, SHP Program	Transitional Housing for Adult Individuals
Grace House	TBRA, Halfway House	Transitional Housing for Adult Individuals
Harbor House	Halfway House	Transitional Housing for Adult Individuals
Karat Place	Karat Place	Transitional Housing for Adult Individuals
Lending a Hand	Transitional Program	Transitional Housing for Adult Individuals
Lightout Ministries	Nehemiah Program	Transitional Housing for Adult Individuals
Memphis Union Mission	Calvary Colony, Wright House	Transitional Housing for Adult Individuals
Mission Global Ministry	Transitional Program	Transitional Housing for Adult Individuals
Odessa's Foster Care	Health Care for Homeless Vets	Transitional Housing for Adult Individuals
Synergy Foundation	Transition to Independence	Transitional Housing for Adult Individuals
Salvation Army	Adult Rehabilitation Center	Transitional Housing for Adult Individuals
Trinity Community Coalition Outreach	Transitional Housing	Transitional Housing for Adult Individuals
Warriors Ministries	Halfway House, Recovery Program	Transitional Housing for Adult Individuals
Youth Villages	Janie's House	Transitional Housing for Youth (Under 18 Yrs.)
MIFA	HPRP Homeless Assistance	HPRP - Rapid Rehousing for Families
Case Management, Inc.	Family Haven Apartments	Permanent Supportive Housing for Families
Alpha Omega Veterans Services	Court Street, Depot Towns Homes, Depot SRO/Community Service	Permanent Supportive Housing for Adult Individuals
Behavioral Health Initiatives	Phoenix Project	Permanent Supportive Housing for Adult Individuals
Case Management, Inc.	TBRA, Holmes rd., Boyette Memorial, Poplar Ave, Alice Ave	Permanent Supportive Housing for Adult Individuals
City of Memphis/Case Management, Inc	HomePlus	Permanent Supportive Housing for Adult Individuals
City of Memphis/Friends for Life	Aloysius Homes S	Permanent Supportive Housing for Adult Individuals
City of Memphis/SHIELD, Inc.	S Program	Permanent Supportive Housing for Adult Individuals
Door of Hope	Pilgrim's Rest, One Door at a Time, 245 N Bellevue	Permanent Supportive Housing for Adult Individuals
Frayser/Millington Mental Health Center	North Hill Woods	Permanent Supportive Housing for Adult Individuals
Shelby County Government	Permanent Supportive Housing for Chronically Homeless, No Place Like Home	Permanent Supportive Housing for Adult Individuals
TMHCA	Beers Van Gogh Center for Ex	Permanent Supportive Housing for Adult Individuals
Trinity Community Coalition Outreach	Permanent Supportive Housing	Permanent Supportive Housing for Adult Individuals
Veterans Administration	VASH	Permanent Supportive Housing for Adult Individuals

Table 2—Inventory of Homeless Facilities

**Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons**

The following supportive services are available to most homeless persons:

- Health care
- Temporary Assistance for Needy families, Food Stamps, and child care
- Dental and vision on a limited basis
- Mental health services on a limited basis
- Substance abuse treatment and counseling
- Employment services on a limited basis
- Legal services
- Domestic violence services
- Limited outreach and engagement

**List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.**

Each year, among the programs that serve homeless individuals and families in Shelby County, there are various changes. Programs may open or close, change service approach or population, and/or reduce or expand capacity. “Table 1” lists the organizations, their facilities and respective housing services that are available to the Memphis and Shelby County homeless population. “Table 2” displays the non-housing related support services that are available for the homeless and serve chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth.

## **MA-35 Special Needs Facilities and Services – 91.210(d)**

### **Introduction**

Shelby County Department of Housing does not receive funding to directly assist the special needs population. SCDH relies on outside organizations that directly help those with special needs to refer those needing assistance in the way of housing rehabilitation or down-payment assistance. SCDH assists in making owner-occupied housing safe and accessible for any person that meets the eligibility guidelines. We also will provide down-payment assistance for persons who qualify for the program. SCDH will continue to work with outside agencies in coordinating referrals to assist members of the non-homeless special needs population. Additionally, the SCDH plans to use some future funding towards public services for special needs populations in the area, particularly for the elderly and persons with disabilities.

### **Including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify, and describe their supportive housing needs**

As discussed in the Needs Assessment, the elderly and frail elderly, physically disabled and the developmentally disabled, may need in-home accommodations to live comfortably. Assisted living options for these populations are also needed. In previous years, SCDH has used HOME and CDBG grant funds to make in-home accommodations for the physically disabled which included: wheelchair ramps (both exterior and interior) and in extreme cases a wheelchair lift; widened doors; lowered light switches and thermostats; tub rails; accessible toilets; changed vanity cabinets to wall hung sinks; lowered mirrors; modified cabinets; lowered closet runs; replaced carpet with vinyl; eliminated bathtub and put in handicap accessible shower; replaced door knobs with lever handles; and provided keyless entries.

According to the 2015 Memphis Transitional Grant Area Ryan White Needs Assessment, stable housing is essential for successful treatment of HIV/AIDS. In a survey of Ryan White consumer needs, 18.05% of consumers were temporarily housed and 5.94% were in unstable housing. In a survey of least satisfied Ryan White services, all surveyed groups discussed housing, frequently noting the long delays between reaching out for assistance and receiving assistance.

Persons with severe mental illness, substance abuse issues, and victims of domestic violence need support services to reduce their risk of homelessness in addition to services specific to their issues; rehabilitation, medication, counseling and case management, halfway houses, transportation and employment services. Persons with mental illnesses are often dually diagnosed as substance abusers, and homelessness likely intensifies the symptoms of the diseases. Support services for persons with dual

diagnoses are needed to address the diseases, stabilize the person and reduce his or her chances of being homeless.

According to the Millington Housing Authority Executive Director, the public housing residents would benefit from social services programs such as a resident employment and training center, case management, and a Family Self-Sufficiency Program. This group needs better access to knowledge that will help improve their social and economic situation and resources that would prepare them to eventually become homeowners. Such a service could be provided through a social worker that periodically visits tenants.

**Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing**

Regional One Health in Memphis serves the overwhelming majority of homeless and other severely disadvantaged people in Memphis and has discharge policies to help prevent homelessness. Because Regional One serves so many uninsured and critically ill people, the hospital has major financial problems that make it financially impossible for it to refrain from discharging people until appropriate housing is secured. However, Regional One is a participant in a local collaboration to help prevent patients requiring supportive housing from becoming homeless upon discharge.

The State Department of Mental Health and Memphis Mental Health Institute (MMHI), the State's acute care facility in Memphis, have discharge policies that require housing as a condition of discharge. MMHI also is a participant in the collaboration to help prevent patients from becoming homeless upon discharge.

The Homeless Hotline, operated by MIFA, provides discharge planners with reliable, up-to-date information on the daily availability of supportive housing beds/units and has executed a Memorandum of Agreement with MMHI outlining the respective responsibilities. In addition, the Community Alliance for the Homeless facilitates the role of Homeless Referral Center (a program administered by the MIFA) in helping to connect persons returning from health institutions with supportive services and housing. The program was established to provide a single source of up-to-date and readily available information on permanent supportive housing resources.

The City of Memphis provides funding to Case Management Inc. to help coordinate the releases of mentally ill patients from Shelby County and City jails.

**Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)**

Multiple municipalities in the Urban County have expressed a need for improved services for seniors and individuals with disabilities. These include ADA improvements to infrastructure such as sidewalks, handicap ramps, and upgraded crosswalk signals, along with public services such as fine arts classes and fitness classes for seniors. During PY 2019, SCDH will address the housing and supportive services needs of the non-homeless special needs population by administering our Rehabilitation Program in relation to the goal of "Preserve Housing Affordability" and conducting Public Services activities in relation to the goal of "Provide Public Services". Through the Rehabilitation Program, eligible clients that are members of the special needs population, such as elderly and disabled, that need accessibility/Visitability improvements made to their home such as widened doorways, grab bars in the bathroom, and ramps as needed will be presented with the option of accessibility modifications. Through Public Services Activities, SCDH will provide fine arts classes to the elderly/senior citizens at Senior Centers and/or Community Centers in the Urban County.

**For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))**

Multiple municipalities in the Urban County have expressed a need for improved services for seniors and individuals with disabilities. These include ADA improvements to infrastructure such as sidewalks, handicap ramps, and upgraded crosswalk signals, along with public services such as fine arts classes and fitness classes for seniors. During PY 2019, SCDH will address the housing and supportive services needs of the non-homeless special needs population by administering our Rehabilitation Program in relation to the goal of "Preserve Housing Affordability" and conducting Public Services activities in relation to the goal of "Provide Public Services". Through the Rehabilitation Program, eligible clients that are members of the special needs population, such as elderly and disabled, that need accessibility/Visitability improvements made to their home such as widened doorways, grab bars in the bathroom, and ramps as needed will be presented with the option of accessibility modifications. Through Public Services Activities, SCDH will provide fine arts classes to the elderly/senior citizens at Senior Centers and/or Community Centers in the Urban County.

## **MA-40 Barriers to Affordable Housing – 91.210(e)**

### **Negative Effects of Public Policies on Affordable Housing and Residential Investment**

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

#### **1) Segregation persists.**

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

#### **2) Disparities in housing needs.**

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

#### **3) Disparities in access to opportunity.**

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

#### **4) Barriers to housing choice for people with disabilities.**

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

#### **5) Location and utilization of publicly assisted housing**

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

#### **6) Lack of fair housing capacity**

*Contributing factors include perceived and actual housing discrimination, lack of fair housing knowledge among landlords and real estate professionals, and fair housing violations within the banking industry.*



## MA-45 Non-Housing Community Development Assets – 91.215 (f)

### Introduction

Based on the Business Activity table provided, there are three major employment sectors within the Urban County. The Education and Health Care Services sector recorded 33,008 workers in the 2011-2015 American Community Survey. The Retail Trade sector was second, employing 16,962 workers with the Transportation and Warehousing sector following closely in third by employing 15,523 workers. Because our jurisdiction is composed of suburbs outside the city of Memphis, there are fewer jobs than workers in the Urban County. According to LEHD data, only 25,869 people who are employed in the Urban County also work in the Urban County. There are 49,285 people who live outside the Urban County who commute to work in the Urban County. The majority of people, 107,256, live in the Urban County yet work outside of the Urban County.

### Economic Development Market Analysis

#### Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	419	105	0	0	0
Arts, Entertainment, Accommodations	9,207	8,516	7	11	4
Construction	5,231	3,865	4	5	1
Education and Health Care Services	33,008	14,413	24	19	-5
Finance, Insurance, and Real Estate	9,801	2,581	7	3	-4
Information	2,371	842	2	1	-1
Manufacturing	14,656	6,627	11	9	-2
Other Services	6,469	2,635	5	4	-1
Professional, Scientific, Management Services	12,762	15,194	9	20	11
Public Administration	8,078	2,346	6	3	-3
Retail Trade	16,962	11,428	12	15	3
Transportation and Warehousing	15,523	1,988	11	3	-8
Wholesale Trade	4,492	4,614	3	6	3

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Total	138,979	75,154	--	--	--

**Table 40 - Business Activity**

**Alternate Data Source Name:**

ACS 2011-2015 (Workers), 2015 Longitudinal Employee

**Data Source Comments:**

## Labor Force

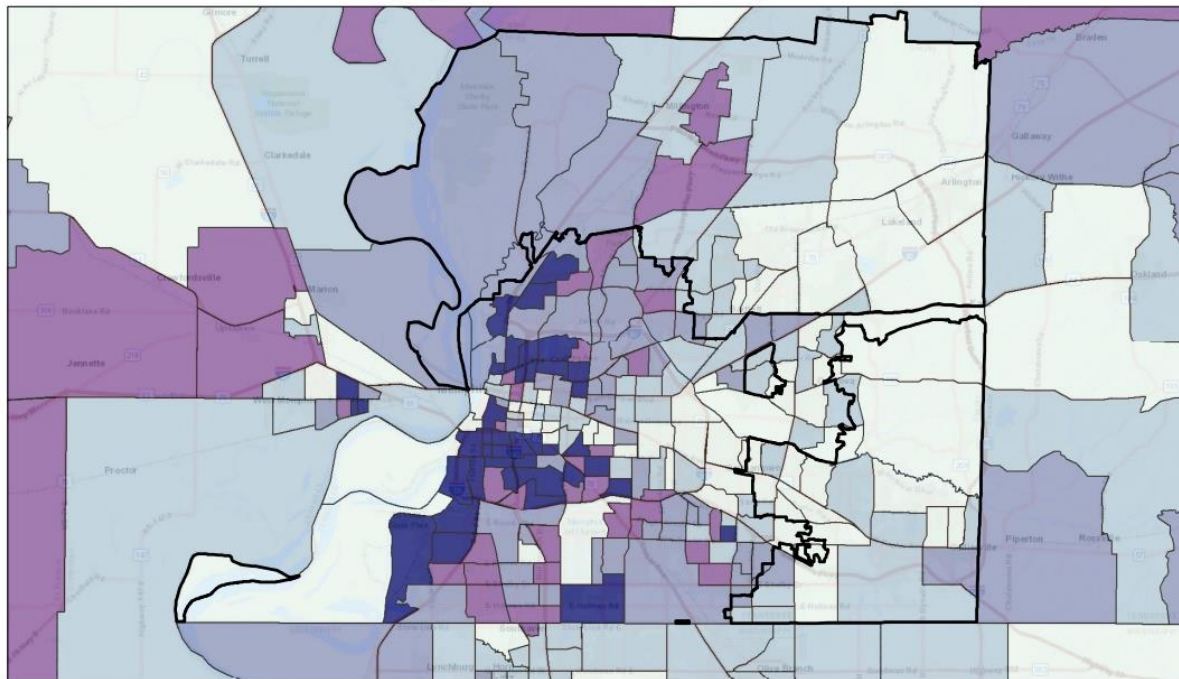
Total Population in the Civilian Labor Force	149,004
Civilian Employed Population 16 years and over	141,965
Unemployment Rate	0.00
Unemployment Rate for Ages 16-24	15.50
Unemployment Rate for Ages 25-65	3.36

**Table 41 - Labor Force**

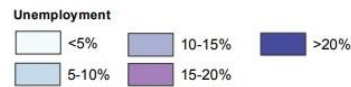
**Alternate Data Source Name:**  
2013-2017 ACS 5 Year Estimates

**Data Source Comments:**

**Unemployment Rate - Shelby County CBDG**



April 23, 2019



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

## CPD Map- Unemployment

Occupations by Sector	Number of People
Management, business and financial	27,308
Farming, fisheries and forestry occupations	211
Service	19,630
Sales and office	36,434

Occupations by Sector	Number of People
Construction, extraction, maintenance and repair	8,041
Production, transportation and material moving	14,766

**Table 42 – Occupations by Sector**

Alternate Data Source Name:  
2013-2017 ACS 5 Year Estimates  
Data Source Comments:

**Travel Time**

Travel Time	Number	Percentage
< 30 Minutes	81,953	61%
30-59 Minutes	48,943	36%
60 or More Minutes	4,237	3%
<b>Total</b>	<b>135,133</b>	<b>100%</b>

**Table 43 - Travel Time**

Alternate Data Source Name:  
2013-2017 ACS 5 Year Estimates  
Data Source Comments:

**Education:**

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	3,653	294	3,043
High school graduate (includes equivalency)	21,204	1,356	7,079
Some college or Associate's degree	37,515	1,187	9,095
Bachelor's degree or higher	56,017	1,654	9,020

**Table 44 - Educational Attainment by Employment Status**

Alternate Data Source Name:  
2013-2017 ACS 5 Year Estimates  
Data Source Comments:

## Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	180	324	452	1,062	1,471
9th to 12th grade, no diploma	2,575	1,103	1,355	2,694	2,154
High school graduate, GED, or alternative	6,842	5,996	7,194	16,524	10,473
Some college, no degree	8,785	7,571	8,038	19,413	8,919
Associate's degree	511	2,884	3,185	6,934	2,088
Bachelor's degree	2,477	9,214	11,018	21,628	7,033
Graduate or professional degree	190	4,844	7,555	13,001	4,982

**Table 45 - Educational Attainment by Age**

**Alternate Data Source Name:**  
2013-2017 ACS 5 Year Estimates  
**Data Source Comments:**

## Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	19,361
High school graduate (includes equivalency)	25,390
Some college or Associate's degree	31,850
Bachelor's degree	49,490
Graduate or professional degree	63,006

**Table 46 – Median Earnings in the Past 12 Months**

**Alternate Data Source Name:**  
2013-2017 ACS 5 Year Estimates  
**Data Source Comments:**

## Based on the Business Activity table above, what are the major employment sectors within your jurisdiction?

Based on the Business Activity table provided, the major employment sectors within the Urban County are centered around Health Care and Logistics. The Education and Health Care Services is the largest sector, with 33,008 recorded workers in the 2013-2017 American Community Survey. Within the past five years, Retail Trade has become the second largest sector, with 16,962 workers, followed by Transportation and Warehousing with 15,523 works and Manufacturing with 14,656 workers. There is some mismatch between workers and jobs, though this difference can likely be attributed to individuals living in the Urban County and working in the city of Memphis, and vice versa.

## **Describe the workforce and infrastructure needs of the business community:**

Currently, the Urban County has very low unemployment (3.36%) for people aged 25 and over, yet incomes remain low for workers with little educational attainment, with workers with less than a high school degree having median earning of \$19,361, and workers with a high school degree earning \$25,390. Educational services and job skills training can improve the incomes of these workers. Additionally, more frequent and timely public transit can allow workers who do not have access to cars to have access to a wider selection of jobs.

Because Memphis International Airport is the busiest cargo airport in North America, efficient, well-maintained infrastructure is needed to distribute cargo that arrives in the city. There is also a regional shortage of truck drivers to accommodate this cargo. For the health sector, there is a nursing shortage which has caused local hospitals like St. Francis to recruit nurses from outside the state and country.

According to the FCC, 100% of residents in Shelby County have access to at least one Broadband internet provider. The number of providers available to consumers is important, since multiple providers begets competition and the opportunity for lower prices. 98.25% of residents have access to two providers or more, and 75.07% have access to three providers or more. Residents in urban areas are more likely to have access to more than one providers, with 76% of urban residents having access to three or more providers, compared to 40% of rural residents. 100% of the population has access to internet speeds of at least 25Mbps down, yet high speed broadband options are limited, with 86% of the population having 100Mbps down speeds offered from only one provider. 88% of the residents of Shelby County do not have access to internet speeds of 250Mbps or faster. This lack of high speed internet options could negatively affects Shelby County's ability to compete in the national technology economy.

Additionally, according to 2017 ACS data, 9,257 (9.4%) of households in the Urban County do not have internet access, signaling that the internet offered to residents may be unaffordable. This lack of internet access could interfere with household's ability to find available jobs or resources, and hinder student's ability to compete with their peers in school. Through our rehabilitation program, SCDH intends to give eligible clients the option to gain internet connectivity by include running fiber to a nearby tower that then beams the signal to homes and/or using co-ax or other cables to link homes to a nearby fiber-connected box called a node.

Severe storms and flooding are the greatest disaster risk facing Shelby County, with flooding occurring generally from one to four times each year. Shelby County's primary focus for resiliency efforts is on low-to-moderate income (LMI) areas to address post-disaster vulnerability created by poverty and inequality. This includes vulnerabilities such as lack of transportation access, lack of food access, health disparities, and environmental justice concerns. Through Resilient Shelby and a \$60 million CDBG - National Disaster Resilience Grant from HUD, the county is working on resilience projects along Big Creek, Wolf River, and South Cypress Creek, along with a regional resilience plan, to model and plan for

flood impact and other climate risks across the county. The projects focus on flood resilience, community redevelopment, and connectivity to benefit LMI communities in Memphis and Millington. SCDH intends to present the Urban County Consortium with recommended projects that aid in flood resilience.

**Describe any major changes that may have an economic impact, such as planned local or regional public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.**

Current construction of Interstates 69, and 22 will more efficiently connect the Memphis area to places such as Canada, Mexico, Birmingham, and Atlanta, improving the area's logistical capabilities. Construction completed in October 2018 for Interstate 269, also improving connectivity with the area. Memphis International Airport is undergoing \$1.6 billion in renovations, much of which will expand and modernize the FedEx portion of the airport. The Port of Memphis recently received a grant to add 4,900 feet of new railroad tracks to significantly boost rail service. Indigo Agriculture will be moving its headquarters to Memphis and will add 700 jobs to Memphis over the next three years. St. Jude plans to construct a new research center by 2021, which will add more than 1,000 new positions, and Campbell Clinic in Germantown is undergoing expansion to add 185 new employees. According to the Memphis and Shelby County Division of Planning and Development, there was a 72% increase in commercial construction from 2017 to 2018, and the \$1.36 billion in new construction, expansions, and renovations will have lasting impacts on the Memphis area.

According to the Memphis Area Association of Governments' Comprehensive Economic Development Strategy, the logistics sector is becoming more automated. While logistics will remain an important core target for business development, the strategy states that there is a need to look at sister industries and diversification to enhance job and income growth.

**How do the skills and education of the current workforce correspond to employment opportunities in the jurisdiction?**

The 2013-2017 ACS data shows that there are more Urban County residents with some college (no degree) or less educational attainment in comparison to the residents that have an associate's degree or a higher level of educational attainment; 138,310 versus 50,802. The skills and education of the current workforce do not correspond to employment opportunities in the Urban County. A more skilled workforce is desired as the job industries that have larger shares of the jobs are in fact understaffed, particularly the Professional, Scientific, and Management Services industries.

Specialized employment opportunities with higher education requirements have seen a rise over the years and this national trend can also be seen in the Memphis and Shelby County workforce. The skills of current workforce members need to be improved to meet the demands of the workforce and available employment opportunities.

**Describe any current workforce training initiatives, including those supported by Workforce Investment Boards, community colleges and other organizations. Describe how these efforts will support the jurisdiction's Consolidated Plan.**

Workforce Investment Network (WIN) is a community resource dedicated to improving employment opportunities in Shelby, Fayette, Lauderdale, and Tipton Counties. WIN integrates the resources and activities of several federal programs. By fusing these programs into one focused workforce development service location, WIN helps match job seekers with local businesses who are hiring, and provides residents with services, training, skills, and education to promote personal growth and professional advancement.

FastTrack Job Training Assistance Program (FJTAP) is Tennessee's initiative to support industrial recruitment and expansion through direct training assistance for newly hired employees, employees in upgraded positions, and employees retained through instruction. FJTAP staff assists each individual company to develop customized training plans and to provide funding. Eligibility for FJTAP support and levels of funding for training assistance are determined by the amount of company investment, the number of new hires, and the types of skills and knowledge that must be obtained by prospective or newly hired employees

Tennessee Job Skills (TJS) focuses on employers and industries which create high-skilled, high-wage jobs in emerging, high-demand and technology focused sectors of the economy. Training staff will work with companies to develop a unique, flexible, comprehensive training plan which meets the company's initial training needs and will then follow up to insure each phase of the program meets the company's needs. Companies track costs and apply to the state for reimbursement. Reimbursement rates depend on the level of training and the types of instructors utilized.

The Greater Memphis Alliance for a Competitive Workforce (GMACW) was created in 2014 and later absorbed in 2017 by the Economic Development Growth Engine (EDGE) for Memphis and Shelby County. The GMACW collaborates with employers and training resources to address shortages in the area's available skilled workforce.

To address the truck driver shortage, Olympic Career Training Institute trains and employs workers in the Memphis area, with a goal of training 500 drivers a year. Canadian National Railway has donated more than \$1 million to the University of Memphis to support the Southeast Transportation Workforce Center.

**Does your jurisdiction participate in a Comprehensive Economic Development Strategy (CEDS)?**

Yes



**If so, what economic development initiatives are you undertaking that may be coordinated with the Consolidated Plan? If not, describe other local/regional plans or initiatives that impact economic growth.**

The Memphis Area Association of Governments (MAAG) is the local development district created by the State of Tennessee to serve as the regional entity to address community and economic development issues. MAAG is also the designated development district for the region for the Economic Development Administration (EDA). MAAG serves multiple counties across the tristate area, including: Shelby, Fayette, Lauderdale, and Tipton counties in West Tennessee, Crittenden County in Arkansas, and Desoto County in Mississippi. As the designated development district for the EDA, MAAG is charged with developing, maintaining, and implementing a Comprehensive Economic Development Strategy (CEDS) for Fayette, Lauderdale, Tipton, and Shelby counties. The CEDS reviews the history and analyzes the current economic climate of the area. The CEDS also develops goals and objectives for the region and identifies projects that will encourage and promote community and economic development throughout the region.

The objectives defined in the strategy include:

1. Define and develop industries, sectors, or clusters for which the region and sub-areas have a competitive advantage but where there is a gap in marketing, business recruitment, and labor force development efforts in the region.
2. Identify and develop target niches for areas within the region to help reduce competition and build on competitive advantages, with a specific focus on rural versus urban communities.
3. Add value (such as information), where possible, to the workforce development efforts already underway from various entities in the region.
4. Identify infrastructure that could help support regional economic development and/or fill significant gaps in sub-regional development.
5. Identify and implement new opportunities for coordination and collaboration in economic development region-wide or on a sector or sub-regional basis.
6. Identify opportunities for enhancing regional and image or identity.

There are numerous local tax incentives for business throughout the Memphis and Shelby County Area. For example, the Millington/Shelby County Payment in Lieu of Tax (PILOT) is available for projects involving large capital investment and high levels of job creation. Approval is based on a number of performance standards, including the number and type of jobs created, annual base wage, capital investment in real and personal property, and the location of the project. Property taxes are frozen at the pre-development level.

## **Discussion**

Memphis and Shelby County are currently experiencing healthy economic development, with large-scale investment and the creation of thousands of new jobs over the next few years. However, there is a

mismatch between the type of jobs available and the education level of citizens in the area. There is a need for more training for workers, particularly with the threat of low-skilled jobs becoming autonomous in the coming years.

## **MA-50 Needs and Market Analysis Discussion**

### **Are there areas where households with multiple housing problems are concentrated? (include a definition of "concentration")**

According to data gathered from PolicyMap, about of 4% of renter households in the Urban County have two or more housing problems, compared to 0.4% of home-owning households in the county. These households are primarily concentrated in Bartlett, where 37.29% of renters in one tract have multiple housing problems; Germantown surrounding Poplar Ave near Poplar Pike and Farmington Blvd, where 23% of renters with multiple housing problems; Collierville south of Poplar Avenue, where 12.26% of renters have multiple housing problems; and unincorporated Shelby County including Northaven, where 10.07% of renters have multiple housing problems.

Concentrations were listed for areas where the percentage of renter households with multiple housing problems in a census tract was more than double the percentage for the Urban County.

### **Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")**

Black/African American households are concentrated mainly in the unincorporated parts of Shelby County. The census tract that constitutes the Northaven community has a 60% Black/African American population. This census tract is also Low-Mod as 59% of the households are low-to moderate income households. The only other Low-Mod census tract within the jurisdiction is in Collierville which is comprised of 50% Low-Mod households. The census tract that constitutes the Millington Reserve area near Austin Peay Highway consists of 74% Black/African American households and is 60% Low-Mod. This racial group is also concentrated in the Bartlett reserve area (80%) as well as in the Memphis reserve area near Collierville, South of Germantown. Of the census tracts within this Memphis reserve area, the average concentration of Black/African American household is approximately 83%.

Concentration is defined as more than 50% the population within a census tract.

### **What are the characteristics of the market in these areas/neighborhoods?**

The median home values of these areas are generally lower than other median home values throughout the Urban County, the houses are generally primarily built before 1980. Due to home age and the frequency of these homes having two or more housing issues, there is a higher rate of vacancy in these neighborhoods.

### **Are there any community assets in these areas/neighborhoods?**

In or near most of these areas, there are public facilities such as parks, churches, libraries and community centers. Located near the Northaven community is the Meeman Shelby State Park, and this

community also has an active neighborhood association. The Town of Collierville System currently contains 20 regional, community or neighborhood parks.

**Are there other strategic opportunities in any of these areas?**

Shelby County Department of Housing allocates 15% of HOME funds for Community Housing Development Organizations (CHDO). These organizations typically assist neighborhoods by buying dilapidated and foreclosed properties in low-to moderate-income areas and rehabilitating and/or constructing homes. Such efforts do not happen exclusively in these communities as redevelopment occurs throughout the jurisdiction, offering expanded affordable housing opportunities.

# Strategic Plan

## SP-05 Overview

### Strategic Plan Overview

There are seven municipalities in Shelby County including Arlington, Bartlett, Collierville, Germantown, Memphis, Millington, and Lakeland. The Shelby County Urban Entitlement includes unincorporated Shelby County and all of these municipalities except Memphis. SCDH does not propose emphasizing target areas or strategy areas as part of this Strategic Plan. This is primarily because concentrations of low- and moderate-income areas in the jurisdiction are limited, low- and moderate-income area and households are spread throughout the jurisdiction, and assistance is allocated based upon population data from each of the 6 municipalities within the jurisdiction. Housing services offered in accordance with this Strategic Plan will be made available on a county- or jurisdiction-wide basis. Non-housing community development and public service activities will be rotated among the urban county consortium members as resources permit and in accordance with the Strategic Plan to provide benefits in low- and moderate-income areas or direct benefit to low- and-moderate income clients as applicable.

Priority needs identified are: Housing Rehabilitation & Minor Home Repair, Parks & Recreational Facilities, Public Services, Public Facilities Improvements, and Affordable Housing. Strategic Plan Goals are: Preserve Housing Affordability, Improve and Construct Public Facilities, Provide Public Services, and Create Opportunities for Affordable Housing Choice. Anticipated CDBG and HOME resources, including the PY2019 allocation and projected resources for the remaining term of the 5 Year Strategy (assuming level program funding), are detailed later in this portion of the plan. SCDH proposes converting all CDBG program income received during each program year into unallocated funds.

As the primary organization responsible for the administration of funds, implementation of projects and programs, and the expenditure of all grant allocations, SCDH will coordinate efforts and activities within the Urban County community. This coordination will involve the administration and delivery of all CDBG and HOME funds as well as activities funded with these funds. SCDH operates under the direct authority of the Mayor of Shelby County and will continue to be advised by the UCC. Shelby County Government will contract with the respective municipalities for all community development projects during the 5 Year Strategy term and will directly administer and/or deliver those programs/projects associated with Housing Rehabilitation and Minor Home Repair. For Public Service activities, SCDH will contract with the respective municipalities or a third party service provider for all public service activities during the 5 Year Strategy term. This structure will enable all municipalities and Shelby County to have direct control of these funds. The Mayor of Shelby County, representing the Entitlement Area as a whole, will have final approval of all expenditures.

Based on the 2019 Memphis-Shelby County Analysis of Impediments to Fair Housing (AI), the following are barriers to affordable housing: segregation persists, Disparities in housing needs, Disparities in access to opportunity, Barriers to housing choice for people with disabilities, Location and utilization of

publicly assisted housing, and Lack of fair housing capacity. SCDH is not a recipient of Continuum of Care funds; award is made to the City of Memphis.

As local resources allow, SCDH will provide technical assistance, education, and in response to such requests on a case by case basis. Many of the programs and activities outlined in the 5 Year Strategy are related to reducing poverty.

## SP-10 Geographic Priorities – 91.215 (a)(1)

### Geographic Area

Table 47 - Geographic Priority Areas

1	<b>Area Name:</b>	Shelby County Urban County Entitlement Area
	<b>Area Type:</b>	Urban County
	<b>Other Target Area Description:</b>	Urban County
	<b>HUD Approval Date:</b>	
	<b>% of Low/ Mod:</b>	
	<b>Revital Type:</b>	
	<b>Other Revital Description:</b>	
	<b>Identify the neighborhood boundaries for this target area.</b>	
	<b>Include specific housing and commercial characteristics of this target area.</b>	
	<b>How did your consultation and citizen participation process help you to identify this neighborhood as a target area?</b>	
	<b>Identify the needs in this target area.</b>	
	<b>What are the opportunities for improvement in this target area?</b>	
	<b>Are there barriers to improvement in this target area?</b>	
2	<b>Area Name:</b>	Shelby County, Tennessee
	<b>Area Type:</b>	County Jurisdiction
	<b>Other Target Area Description:</b>	County Jurisdiction
	<b>HUD Approval Date:</b>	
	<b>% of Low/ Mod:</b>	
	<b>Revital Type:</b>	
	<b>Other Revital Description:</b>	
	<b>Identify the neighborhood boundaries for this target area.</b>	
	<b>Include specific housing and commercial characteristics of this target area.</b>	
	<b>How did your consultation and citizen participation process help you to identify this neighborhood as a target area?</b>	
<b>Identify the needs in this target area.</b>		

	<b>What are the opportunities for improvement in this target area?</b>	
	<b>Are there barriers to improvement in this target area?</b>	

**General Allocation Priorities**

Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)

SCDH is basing the 5-Year Consolidated Plan and Annual Action Plan on an assumption of funding equal to Program Year 2019 as follows: \$1,189,423.00 in CDBG funds, \$10,000.00 in CDBG Program income, \$377,362.00 in HOME grant funds, \$15,000.00 in HOME program income, and \$84,906.45 in local match funds for use during Shelby County’s Fiscal Year 2020. SCG was allocated \$15,083 fewer CDBG dollars and \$29,192 fewer HOME dollars than originally projected in the proposed Annual Action Plan. As a result, CDBG Administration & Planning was scaled back in relation to the actual allocation. In order to adequately fund our three priorities with CDBG dollars (Housing Rehabilitation & Minor Home Repair, Community Development Projects, and Public Service Activities) CDBG Program Delivery was reduced by \$10,660.40. The HOME budget line items were scaled back in proportion to the actual allocation amount. Anticipated CDBG and HOME resources, including the PY2019 allocation and projected resources for the remaining term of the 5 Year Strategy (assuming level program funding), are shown below. SCDH proposes converting all CDBG program income received during each program into unallocated funds.

There are seven municipalities in Shelby County including Arlington, Bartlett, Collierville, Germantown, Memphis, Millington, and Lakeland. The Shelby County Urban Entitlement includes unincorporated Shelby County and all of these municipalities except Memphis. SCDH does not propose emphasizing target areas or strategy areas as part of this Strategic Plan. This is primarily because concentrations of low- and moderate-income areas in the jurisdiction are limited, low- and moderate-income area and households are spread throughout the jurisdiction, and assistance is allocated based upon population data from each of the 6 municipalities within the jurisdiction. The Shelby County Urban Entitlement Area is a diverse community including a mixture of suburban and rural development.

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



## SP-25 Priority Needs - 91.215(a)(2)

### Priority Needs

Table 48 – Priority Needs Summary

1	<b>Priority Need Name</b>	Housing Rehabilitation & Minor Home Repair
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Large Families Families with Children Elderly Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities
	<b>Geographic Areas Affected</b>	Urban County County Jurisdiction
	<b>Associated Goals</b>	Preserve Housing Affordability
	<b>Description</b>	Housing rehabilitation, modification, and repair to preserve the existing housing stock, assist cost burdened extremely low-, low-, and moderate-income households with maintaining an affordable home, provide lead-safe housing for families with children under 6 years of age, increase the ability for households and families to obtain decent housing, and provide modifications to allow the elderly to age and place and improve accessibility for the physically disabled.
	<b>Basis for Relative Priority</b>	The basis for this priority is established in the needs analysis, particularly with respect to the issues of cost burden, aging, and accessibility.
2	<b>Priority Need Name</b>	Parks & Recreational Facilities
	<b>Priority Level</b>	High
	<b>Population</b>	Non-housing Community Development
	<b>Geographic Areas Affected</b>	Urban County

	<b>Associated Goals</b>	Improve and Construct Public Facilities
	<b>Description</b>	In consultation with executive, planning and engineering staff members of the Urban County governments as described in the Needs Assessment regarding non-housing community development needs, parks and recreational facilities (including ADA accessibility improvements) has been identified as a high priority need.
	<b>Basis for Relative Priority</b>	Consultation with executive, planning and engineering staff members of the Urban County governments as described in the Needs Assessment regarding non-housing community development needs identified parks and recreational facilities (including ADA accessibility improvements) as a high priority need.
<b>3</b>	<b>Priority Need Name</b>	Public Services
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Elderly Elderly Frail Elderly Non-housing Community Development
	<b>Geographic Areas Affected</b>	Urban County
	<b>Associated Goals</b>	Provide Public Services
	<b>Description</b>	In consultation with executive, planning and engineering staff members of the Urban County governments as described in the Needs Assessment regarding public service needs, public services was identified as a moderate to high priority need. In particular, public services for elderly, disabled, and domestic violence victims were identified as a need in the Urban County.
	<b>Basis for Relative Priority</b>	Consultation with executive, planning and engineering staff members of the Urban County governments as described in the Needs Assessment regarding public service needs, services for seniors has been identified as a moderate to high priority need. In particular, public services for elderly, disabled, and domestic violence victims were identified as a need in the Urban County.
<b>4</b>	<b>Priority Need Name</b>	Public Facilities Improvements

	<b>Priority Level</b>	High
	<b>Population</b>	Non-housing Community Development
	<b>Geographic Areas Affected</b>	Urban County
	<b>Associated Goals</b>	Improve and Construct Public Facilities
	<b>Description</b>	In consultation with executive, planning and engineering staff members of the Urban County governments as described in the Needs Assessment regarding non-housing community development needs, public facilities improvements (including sidewalks, streets, water and sewer as well as ADA accessibility improvements) has been identified as a high priority need.
	<b>Basis for Relative Priority</b>	Consultation with executive, planning and engineering staff members of the Urban County governments as described in the Needs Assessment regarding non-housing community development needs, public facilities improvements (including sidewalks, streets, water and sewer as well as ADA accessibility improvements) has been identified as a high priority need.
5	<b>Priority Need Name</b>	Affordable Housing
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Large Families Families with Children Elderly
	<b>Geographic Areas Affected</b>	Urban County
	<b>Associated Goals</b>	Preserve Housing Affordability Create Opportunities for Affordable Housing Choice
	<b>Description</b>	SCDH has identified the need for affordable homeownership opportunities in the urban county as a high priority need and proposes utilizing the HOME CHDO set-aside to create homeownership opportunities either through acquisition and new unit production or rehabilitation of the existing housing stock.

<p><b>Basis for Relative Priority</b></p>	<p>Based on the findings of the Needs Assessment and Market Analysis regarding affordable housing, SCDH has identified the need for affordable homeownership opportunities in the urban county as a high priority need and proposes utilizing the HOME CHDO set-aside to homeownership opportunities either through acquisition and new unit production or rehabilitation of the existing housing stock.</p>
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**Narrative (Optional)**

As the Needs Assessment illustrates, housing rehabilitation (to include modifications to improve accessibility and repairs to address lead-based paint hazards) emerges as a high priority need effecting a range of extremely low-, low-, and moderate-income households. Addressing this need will help achieve the goal of Preserving Housing Affordability while also preserving the existing housing stock in Shelby County including the Urban County. Consultation with executive, planning and engineering staff members of the Urban County governments as described in the Needs Assessment reveals that flood drain improvements, parks and recreational facilities (including ADA accessibility improvements), public facilities improvements (including sidewalks, streets, water and sewer as well as ADA accessibility improvements) are high priority needs throughout the Urban County. Additionally, senior services was identified as a moderate to high priority throughout the Urban County. Addressing these needs will help achieve the goal of improving communities in the Urban County.

**SP-30 Influence of Market Conditions – 91.215 (b)**

**Influence of Market Conditions**

<b>Affordable Housing Type</b>	<b>Market Characteristics that will influence the use of funds available for housing type</b>
Tenant Based Rental Assistance (TBRA)	SCDH has not identified TBRA as a high priority need for use of limited CDBG and HOME funding.
TBRA for Non-Homeless Special Needs	SCDH has not identified TBRA for non-homeless special needs populations as a high priority need for use of limited CDBG and HOME funding.
New Unit Production	SCDH has identified the need for affordable homeownership opportunities in the urban county as a high priority need and proposes utilizing the HOME CHDO set-aside to homeownership opportunities either through acquisition and new unit production or rehabilitation of the existing housing stock.
Rehabilitation	Preserving the existing housing stock and reducing the harmful effects of lead-based paint has been identified as a high priority need.
Acquisition, including preservation	SCDH has identified the need for affordable homeownership opportunities in the urban county as a high priority need and proposes utilizing the HOME CHDO set-aside to homeownership opportunities either through acquisition and new unit production or rehabilitation of the existing housing stock.

**Table 49 – Influence of Market Conditions**

## SP-35 Anticipated Resources - 91.215(a)(4), 91.220(c)(1,2)

### Introduction

Anticipated CDBG and HOME resources, including the PY2019 allocation and projected resources for the remaining term of the 5 Year Strategy (assuming level program funding), are shown below. SCDH proposes converting all CDBG program income received during each program into unallocated funds.

### Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	1,189,423	10,000	0	1,199,423	4,807,692	These anticipated resources are based upon actual allocation amounts for PY2019

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	377,362	15,000	0	392,362	2,008,980	These anticipated resources are based upon actual allocation amounts for PY2019

Table 50 - Anticipated Resources

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

Federal funds will leverage additional resources including approximately \$100,000 in private funds through nonprofit CHDO developers receiving the HOME CHDO set-aside funds and approximately \$85,000 in local funds to meet HOME matching requirements.

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

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

## **Discussion**

These anticipated resources are based upon actual allocation amounts for PY2019.

SCG was allocated \$15,083 fewer CDBG dollars and \$29,192 fewer HOME dollars than originally projected in the proposed Annual Plan.

As a result, CDBG Administration & Planning was scaled back in relation to the actual allocation. In order to adequately fund our three priorities with CDBG dollars (Housing Rehabilitation & Minor Home Repair, Community Development Projects, and Public Service Activities) CDBG Program Delivery was reduced by \$10,660.40. The HOME budget line items were scaled back in proportion to the actual allocation amount.



## SP-40 Institutional Delivery Structure – 91.215(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
SHELBY COUNTY	Government	Non-homeless special needs Ownership Planning neighborhood improvements public facilities public services	Jurisdiction

**Table 51 - Institutional Delivery Structure**

### Assess of Strengths and Gaps in the Institutional Delivery System

As the primary organization responsible for the administration of funds, implementation of projects and programs, and the expenditure of all grant allocations, SCDH will coordinate efforts and activities within the Urban County community. This coordination will involve the administration and delivery of all CDBG and HOME funds as well as activities funded with these funds. SCDH operates under the direct authority of the Mayor of Shelby County and will continue to be advised by the UCC. Shelby County Government will contract with the respective municipalities for all community development projects during the 5 Year Strategy term and will directly administer and/or deliver those programs/projects associated with Housing Rehabilitation and Minor Home Repair. For Public Service activities, SCDH will contract with the respective municipalities or a third party service provider for all public service activities during the 5 Year Strategy term. This structure will enable all municipalities and Shelby County to have direct control of these funds. The Mayor of Shelby County, representing the Entitlement Area as a whole, will have final approval of all expenditures.

SCDH will continue to take advantage of upcoming training opportunities for staff directly involved in the delivery and administration of funds. SCDH will also provide training to the staff of its Urban County partners as requested in order to insure that participating municipalities are aware of their responsibilities under the entitlement programs.

A key strength in SCDH's housing and community development delivery system is its record of successful partnerships with both public and private sector partners including the municipal members of the Urban County Consortium. Communication, cooperation, and coordination between these partners continue to remain strong. SCDH has and will continue to coordinate closely with these partnering agencies and organizations to strengthen regulatory compliance, monitoring, and technical capacity of partners involved in program or activity delivery.

The most significant gap in SCDH's development delivery system remains a lack of sufficient funding to

support housing and community development activities. Fiscal challenges at both the federal, state, and local level limit SCDH's ability to expand services and comprehensively address merging issues.

**Availability of services targeted to homeless persons and persons with HIV and mainstream services**

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
<b>Homelessness Prevention Services</b>			
Counseling/Advocacy	X	X	X
Legal Assistance	X	X	
Mortgage Assistance	X		
Rental Assistance	X	X	X
Utilities Assistance	X	X	X
<b>Street Outreach Services</b>			
Law Enforcement	X		
Mobile Clinics	X	X	
Other Street Outreach Services	X	X	
<b>Supportive Services</b>			
Alcohol & Drug Abuse	X	X	X
Child Care	X	X	
Education	X	X	X
Employment and Employment Training	X	X	X
Healthcare	X	X	X
HIV/AIDS	X	X	X
Life Skills	X	X	X
Mental Health Counseling	X	X	X
Transportation	X	X	X
<b>Other</b>			

**Table 52 - Homeless Prevention Services Summary**

**Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth)**

The service delivery system in Shelby County as a whole includes a range of housing and supportive services for a wide range of subpopulations. The City of Memphis has a centralized intake for homeless families, and a coordinated assessment process for adults unaccompanied by children. There are street outreach teams, mainstream benefit supports, and targeted outreach to veterans and mentally ill individuals. According to the local CoC, currently we have 1352 permanent supportive units and roughly 590 rapid rehousing permanent housing units due to the successful funding of 3 new rapid rehousing

programs, 2 of which are youth specific. There are also transitional housing units for families with children, veterans, and single individuals in recovery from substance abuse and/or mental illness. There is also limited free shelter for single individuals and families with children and a more significant and growing focus on rapid rehousing for families with children. Due to Tennessee laws governing truancy and unaccompanied minors, there are a small number of beds (shelter or transitional) focused on homeless youth and a significant capacity shortage for this population has not been identified.

**Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above**

Key strengths include the centralized intake process that seeks to prevent homelessness for at risk families and match families who have no choice but to enter homelessness with the best fit intervention. There is a relatively strong network of mental health providers who offer services at no charge for persons with significant behavioral health challenges. This and lenient occupancy laws allow special needs populations to survive on extremely low incomes through shared housing strategies. Primary gaps are for permanent housing options for individuals or families with no income, disability application assistance, free shelter for at least three weeks for unaccompanied men and women, and permanent housing for high service need homeless families with children. Finally, there is a need to identify appropriate housing options for victims of domestic violence.

**Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs**

Limited resources for addressing priority needs are expected to create a gap in fully addressing priority needs. Shelby County's experience in administering CDBG and HOME funds in coordination with the Urban County municipalities will continue to be key in effectively addressing priority needs with all limited available resources.

## SP-45 Goals Summary – 91.215(a)(4)

### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Preserve Housing Affordability	2019	2023	Affordable Housing Non-Homeless Special Needs	Shelby County Urban County Entitlement Area Shelby County, Tennessee	Housing Rehabilitation & Minor Home Repair Affordable Housing	CDBG: \$508,945 HOME: \$1,914,640	Homeowner Housing Rehabilitated: 70 Household Housing Unit
2	Improve and Construct Public Facilities	2019	2023	Non-Housing Community Development	Shelby County Urban County Entitlement Area	Parks & Recreational Facilities Public Facilities Improvements	CDBG: \$3,000,000 HOME: \$0	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 1000 Households Assisted
3	Provide Public Services	2019	2023	Non-Homeless Special Needs	Shelby County Urban County Entitlement Area	Public Services	CDBG: \$370,000 HOME: \$0	Public service activities other than Low/Moderate Income Housing Benefit: 100 Persons Assisted
4	Create Opportunities for Affordable Housing Choice	2019	2023	Affordable Housing Homeless Fair Housing	Shelby County Urban County Entitlement Area	Affordable Housing	CDBG: \$0 HOME: \$283,022	Homeowner Housing Added: 5 Household Housing Unit

Table 53 – Goals Summary

### Goal Descriptions

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

**Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)**

Shelby County estimates providing affordable housing to 5 extremely low-income, low-income, or moderate-income families in partnership with nonprofit developers receiving HOME CHDO set-aside funds.

**SP-50 Public Housing Accessibility and Involvement – 91.215(c)**

**Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)**

Not applicable.

**Activities to Increase Resident Involvements**

The MillHA has a Resident Advisory Board that meets once every year and also holds a public hearing once every year. MillHA indicated that that this board will continue to meet and these public hearings will continue to be held during the 5-Year Strategy Period. MillHA also reported that it publishes a newsletter to inform residents.

**Is the public housing agency designated as troubled under 24 CFR part 902?**

No

**Plan to remove the ‘troubled’ designation**

Not applicable.

## **SP-55 Barriers to affordable housing – 91.215(h)**

### **Barriers to Affordable Housing**

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

#### **1) Segregation persists.**

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

#### **2) Disparities in housing needs.**

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

#### **3) Disparities in access to opportunity.**

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

#### **4) Barriers to housing choice for people with disabilities.**

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

#### **5) Location and utilization of publicly assisted housing**

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

#### **6) Lack of fair housing capacity**

*Contributing factors include perceived and actual housing discrimination, lack of fair housing knowledge among landlords and real estate professionals, and fair housing violations within the banking industry.*

## **Strategy to Remove or Ameliorate the Barriers to Affordable Housing**

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



**Figure VIII-1.**  
**Goals and Strategic Partnership Opportunities**

REGIONAL FAIR HOUSING GOALS & STRATEGIC PARTNERSHIP OPPORTUNITIES	FAIR HOUSING ISSUES/IMPEDIMENTS TO BE ADDRESSED BY GOAL
<b>Goal 1. Address fair housing concerns in the ownership market:</b>	
A. Continue to improve housing quality and increase housing accessibility through housing rehabilitation, repair and accessibility grant programs and low cost lending.	Disparities in Housing Needs; Barriers to Housing Choice for People with Disabilities
B. Continue to improve ownership affordability and access to capital through down payment assistance programs.	Segregation; Disparities in Hsg Needs; Disparities in Access to Opp
C. Continue to create affordable housing opportunities through partnerships with local non-profits by using HOME CHDO set-aside funds	Segregation; Disparities in Hsg Needs; Disparities in Access to Opp
D. Consider the following strategic partnership opportunities: <ul style="list-style-type: none"> <li>Boost residents' access to residential capital through partnerships with local lenders (to understand and address lending disparities).</li> <li>Boost residents' access to residential capital by providing credit counseling and financial literacy classes.</li> </ul>	Segregation; Disparities in Hsg Needs; Disparities in Access to Opp
<b>Goal 2. Address fair housing concerns in the rental market:</b>	
A. Shelby County only: Increase staff capacity to more immediately address fair housing concerns of tenants; become a HUD Certified Housing Counseling Agency, have 2 HUD certified Housing Counselors on staff, and develop a tenants rights counseling curriculum.	Lack of Fair Housing Capacity
B. Consider the following strategic partnership opportunities: <ul style="list-style-type: none"> <li>Develop an eviction prevention program. This could include one-time emergency rental assistance, renter basic skills training, financial counseling, mediation between landlords/tenants, etc. This could be developed in conjunction with the existing rapid rehousing program and/or in partnership with Memphis Area Legal Services (MALS).</li> <li>Work with the Memphis Housing Authority to encourage housing choice voucher use in high opportunity areas through mobility counseling and landlord recruitment in high opportunity areas.</li> </ul>	Disparities in Housing Needs
	Segregation; Disparities in Access to Opp; Location and Utilization of Publicly Assisted Housing
<b>Goal 3. Address fair housing concerns related to land use and development policies:</b>	
A. City of Memphis only: Develop community priorities for siting LIHTC and other publicly supported housing developments and work to promote community support of such developments in high opportunity areas. To the extent possible, provide comments on the State's Qualified Allocation Plan (QAP) which governs LIHTC allocation.	Segregation; Disparities in Access to Opportunity; Location and Utilization of Publicly Assisted Housing
B. Consider the following strategic partnership opportunities: <ul style="list-style-type: none"> <li>Develop policies and procedures that support balanced housing opportunities, including affordable/workforce housing (e.g., adopt an anti-NIMBY policy, incorporate developer incentives for affordable development, inclusionary zoning ordinance).</li> <li>Review zoning/land use regulations to ensure that a diversity of housing choices is allowable throughout residential districts. Improve clarity in code related to siting multifamily development and compliance with fair housing and accessibility standards.</li> <li>Adoption of a visitability ordinance and/or developer incentives to encourage or require universal design to improve accessibility/adaptability in market-rate new construction.</li> </ul>	Segregation; Disparities in Hsg Needs; Disparities in Access to Opp; Location and Utilization of Publicly Assisted Housing
	Segregation; Disparities in Housing Needs; Disparities in Access to Opportunity
	Disparities in Access to Opportunity; Barriers to Housing Choice for People with Disabilities
<b>Goal 4. Continue to increase fair housing knowledge and capacity in the region in partnership with</b>	
A. Continue to support fair housing outreach and education through fair housing events and training, fair housing materials in multiple languages and mediums, and landlord/tenant resources.	Lack of Fair Housing Capacity
B. Improve training for real estate professionals with a focus on reducing perceived racial steering.	Lack of Fair Housing Capacity
C. Collaborate with local fair housing organizations to conduct regional fair housing testing as a tool for fair housing enforcement and to better understand private discrimination in the housing market.	Lack of Fair Housing Capacity
<b>Goal 5. Utilize economic development tools to promote fair housing choice and access to opportunity:</b>	
A. City of Memphis only: Identify opportunities for collaboration with economic development initiatives (e.g., EDGE) to help focus investment and job training resources to address fair housing concerns in an effort to improve access to opportunity in under-resourced areas.	Disparities in Access to Opportunity
B. Increase access to job training resources for under-employed residents and for residents with disabilities through partnerships with regional service providers and employers.	Disparities in Access to Opp; Barriers to Housing Choice for People with Disabilities
C. City of Memphis only: Promote economic investment (public and private) in distressed areas that have high minority concentrations: <ul style="list-style-type: none"> <li>Explore partnerships with lenders such as community development financial institutions (CDFIs) that serve the region to discuss potential partnership opportunities for 1) Developing the capacity of small businesses in distressed areas and 2) Are committed to helping transform distressed communities.</li> <li>Identify areas where new construction of affordable housing could serve as an economic catalyst for revitalization. Leverage county-owned land banked properties for catalytic development and affordable housing. The development approach should encourage infill and higher density residential use (missing middle housing and/or higher density).</li> <li>Coordinate investments with the Memphis Blight Elimination Steering Team to leverage efforts.</li> </ul>	Disparities in Housing Needs; Disparities in Access to Opportunity; Location and Utilization of Publicly Assisted Housing
<b>Goal 6. Promote equity in access to community assets:</b>	
A. Strengthen regional transportation planning and expand public transit service to increase access to jobs and services for all residents. Continue to coordinate with the MPO to ensure transportation planning activities take housing issues into consideration and support Memphis 3.0 initiative to improve job access for minority residents through transit services.	Segregation; Disparities in Access to Opportunity; Barriers to Housing Choice for People with Disabilities
B. Consider pedestrian improvements like sidewalks and street lighting to improve accessible infrastructure and promote safety.	Disparities in Access to Opp; Barriers to Housing Choice for People with Disabilities
C. Collaborate with Shelby County School District and other districts in Shelby County to improve equity in school quality and access to high performing schools for all residents.	Disparities in Access to Opportunity
D. Complete a Regional Resilience Plan and implement resilience projects in areas susceptible to flooding in order to preserve and create community assets such as parks.	Disparities in Access to Opportunity
E. Consider the following strategic partnership opportunities: <ul style="list-style-type: none"> <li>Strengthen regional transportation planning and expand public transit service to increase access to jobs and services for all residents. Continue to coordinate with the MPO to ensure transportation planning activities take housing issues into consideration and support Memphis 3.0 initiative to improve job access for minority residents through transit services.</li> <li>Collaborate with Shelby County School District and other districts in Shelby County to improve equity in school quality and access to high performing schools for all residents.</li> </ul>	Segregation; Disparities in Access to Opportunity; Barriers to Housing Choice for People with Disabilities
	Disparities in Access to Opportunity

## **SP-60 Homelessness Strategy – 91.215(d)**

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

SCDH is not a recipient of Continuum of Care funds. Funds for the community are awarded to the City of Memphis.

The City of Memphis has operated a central intake and assessment for all families facing homelessness since 2009. It includes a 24/7 phone-based screening, as well as face-to-face intake and assessment during the business day. The City of Memphis has a coordinated entry for single individuals that include the Vulnerability Index & Service Prioritization Decision Assistance Tool (VI-SPDAT 2.0) and a second-level assessment, the Full-SPDAT. The Hospitality Hub and the H.O.P.E. organizations provide the initial vulnerability screenings using the VI and outreach workers complete the second-level assessment for those whose score indicates the need for permanent supportive housing. Priority access to permanent supportive housing resources offered by local CoC agencies is given based on the level of vulnerability. All individuals that score higher than a 3 on the VI-SPDAT are placed on a By-Name List which is reviewed weekly with agency providers and outreach. Additionally, CAFTH's Coordinated Entry Facilitator assists with organizing referrals and communicating with outreach workers and agency providers to ensure referrals are occurring outside of the weekly meetings. Outreach workers are employed through Case Management, Inc.'s PATH program and Catholic Charities.

### **Addressing the emergency and transitional housing needs of homeless persons**

Memphis has identified the need for low-barrier emergency shelters, and specifically additional beds for single women and families with children. There are no free shelters in Memphis and Shelby County for men. The RHY funding stream for emergency shelter beds for youth did not get renewed either. Memphis has worked diligently with independent shelters and faith-based groups to encourage a low-barrier approach as well as swiftly accessing the new Coordinated Entry System. Outreach has a specific plan for going to emergency shelters in order to do the vulnerability assessments and engage with consumers that may be too vulnerable to access the system on their own. With the increase of youth-specific programs, Memphis has also been able to provide other emergency solutions such as hotel stays for those not old enough to enter a shelter. Memphis Department of Corrections as well as multiple hospitals now inform CAFTH when they are taking someone to emergency shelter, so they can be proactive on the front and in getting them into Coordinated Entry.

**Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again.**

Coordinated Entry allows the City of Memphis CoC to not only house swiftly, but appropriately. Through outreach and case conferencing Memphis is assigning units for success. With that referral comes prior months of case management, transition planning, and resource access. The Memphis programs work hard to maintain and grow their connection to local resources and services, so clients have a comprehensive support system in place in conjunction with their housing. Through weekly meetings, they are able to identify open units quickly and often in advance of the vacancy. Placement happens in real-time, and homeless persons are moved in efficiently. Case management entails goals and regular progress assessments to ensure stability and future prevention. The permanent supportive housing programs maintain a 95% housing retention rate.

Catholic Charities of West Tennessee and Memphis Area Legal Services are two Rapid Rehousing initiatives that focus on single adults under the Supportive Services for Veteran Families (SSVF) program. OUTMemphis provides Rapid Rehousing for LGBTQ youth ages 18-24 who are experiencing literal homelessness or couch surfing and per HUD are classified as unstably housed. Families receiving assistance through this initiative, along with the 4 other Rapid Rehousing programs operated by non-veteran specific service providers give the Memphis CoC an opportunity for a no-wrong door approach. Walk-ins are immediately assessed for vulnerability, thereby offering early intervention and shorter homeless episodes than other individuals and families.

The Memphis CoC continues to maintain a Housing First Assertive Community Treatment (ACT) team. The team provides intensive, integrated treatment for dually diagnosed chronically homeless individuals who reside in permanent housing. This team, supervised by Alliance Healthcare Services (AHS), includes mental health professionals, physical health professionals, case managers, and peer support specialists. With the expiration of the SAMHSA CABHI grant, the ACT team has covered the need for ongoing case management on not only some of those CABHI clients, but new clients through Coordinated Entry as well. AHS serves at least 80 individuals who are housed with permanent housing providers. The services we expect that people leaving institutions will need are housing, community based mental health counseling and treatment, physical health care, employment services, substance abuse counseling and treatment, disability benefit application assistance, and legal advocacy/services.

The Memphis CoC has worked with the Department of Human Services (DHS) and Workforce Investment Network (WIN) to develop ongoing partnerships and to leverage resources. The Department of Children's Services (DCS) is a key partner in our family-specific permanent supportive housing program, which has the capacity of 69 units. School liaisons are now very active in our CoC committees and

strategic planning. The youth advisory board and youth committee also focus on prevention for transition age youth and foster care extension.

The Memphis CoC also hosts an Emergency Housing Partnership Committee, which focuses solely on the family's homeless system and its performance and sustainability. Emergency Shelters, service providers, and housing programs specific to families discuss resources, enhancements, performance measures, and capacity barriers. Hotline calls are monitored to ensure no family is ever left outside.

**Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs**

The Memphis and Shelby County Coordinated Entry System has partnered with hospitals and jails to avoid street homeless episodes during discharge, as well as housing solutions and quick placement. Hospital staff is trained on the vulnerability assessment and attend Coordinated Entry meetings to identify those in future need of homeless assistance. Other partnerships, including local crisis hospitals and DCS continue to improve. We have developed a collaborative partnership with the DCS Regional Administrator. DCS has a funding mechanism that can be used to pay rental assistance to families whose only barrier to family reunification is homelessness. CAFTH and MIFA are working with DCS to make client referrals to both rapid rehousing and permanent supportive housing. The Memphis Coc also continue to work with the state DCS to develop a mechanism to prevent homelessness for youth aging out of foster care.

The Memphis CoC has an ongoing pilot with a local hospital to design and implement a service pathway that effectively addresses housing and supportive service needs by leveraging CAFTH's Coordinated Entry System. Using a hospital, homeless specific navigator, homeless patients are flagged and assessed for vulnerability on the front end. They also have user licenses to the Homeless Management Information Systems database, to better connect existing clients and new clients as well.

The Emergency Housing Partnership referred 8 families for Emergency Solutions Grant funding, with 4 being served through that funding. In 2018, MIFA's central intake received 19,421 requests for assistance, and screened 30,011 families with 5,850 client/staff interactions. MIFA also provided emergency services including rent, mortgage or utility assistance to prevent homelessness. 357 families were served through RRH assistance, with 7,356 hotel/motel nights paid for by MIFA in addition to emergency shelter referrals. 274 families were successfully mediated to avoid homelessness. MIFA also triaged 7,499 homeless hotline calls, with 73 referred to the Domestic Violence hotline.

The Memphis CoC would still like to secure funding and a non-profit sponsor that could provide respite care to those who are homeless and have had or are awaiting surgery or other medical procedures that make it unsafe for them to discharge to homelessness.

## **SP-65 Lead based paint Hazards – 91.215(i)**

### **Actions to address LBP hazards and increase access to housing without LBP hazards**

SCDH plans a comprehensive approach to addressing LBP hazards and increasing access to housing units without LBP hazards. Through the Housing Rehabilitation Program, SCDH will continue to comply with the HUD Lead Safe Housing Rule. Target housing units assisted through this program will each undergo a paint inspection and risk assessment by a Tennessee Department of Environment and Conservation (TDEC) certified Risk Assessor to identify all LBP hazards. Work specifications will be developed by a TDEC certified Supervisor to address all identified LBP hazards in conjunction with the housing rehabilitation work specifications. TDEC certified Lead Abatement firms, using TDEC certified Supervisors and Workers, will be selected to address the LBP hazards in accordance with the work specifications. Upon completion of the housing rehabilitation, a clearance examination will be conducted by a TDEC certified Risk Assessor to ensure that each unit is lead safe. The Lead abatement Firm will be responsible for any recleaning and reexamination costs associated with failed clearance examinations until clearance is achieved.

SCDH will continue implementing and administering the Lead Hazard Control Program (LHCP) funded in part by a 2016 Lead Based Paint Hazard Control Grant awarded by the HUD OHHLHC. The grant term is October 3, 2016 through October 2, 2019. It is anticipated that SCDH will not seek additional OHHLHC assistance to continue the LHCP. The LHCP program will address LBP hazards in the same manner as described above for the Housing Rehabilitation Program. The LHCP includes an extensive community education and outreach component primarily targeting families with children less than 6 years of age, as opportunities to educate contractors on EPA's Lead Renovation, Repair and Painting Rule (RRP) Rule. Finally, SCDH will evaluate private requests for assistance (outside the scope the Housing Rehabilitation program and LHCP) in addressing LBP hazards. As local resources allow, SCDH will provide technical assistance and education in response to such requests on a case by case basis.

### **How are the actions listed above related to the extent of lead poisoning and hazards?**

All housing units built before 1980 are counted herein as potentially having lead-based paint hazards present because 1978 was the first year Federal law prohibited lead in residential paint. Housing age is available in increments of ten year time periods through 1990. As not all supplies of lead-based paint were used up immediately after enactment of the ban, there will be instances wherein paint with lead was used in houses built shortly after the ban, Thus, in order to develop a conservative estimate of the housing units that contain lead-based paint hazards, houses built through 1979 are counted. 2013-2017 American Community Survey data indicates that 232,312 of the 399,366 housing units in Shelby County potentially have LBP hazards. Specifically within the Urban County, the same data set indicates that 22,726 housing units potentially have LBP hazards.

The Tennessee Department of Health published a report titled "Lead Poisoning Burden and Screening Among Children Under 6, Tennessee, 2007-2017". This report describes the blood lead screening and the burden of lead poisoning among children under 6 years of age in TN from 2007 to 2017. Among the

86,701 children <6 years screened in 2017, 1,213 children were identified with BLL  $\geq 5\mu\text{g/dL}$ , 23.7% of which had BLL  $\geq 10\mu\text{g/dL}$ .

**How are the actions listed above integrated into housing policies and procedures?**

Policies and procedures for the Housing Rehabilitation Program are structured to ensure that all program facets comply with all applicable TDEC and HUD requirements including the HUD Lead Safe Housing Rule. Similarly, policies and procedures for the LHCP are structured to ensure compliance with all applicable TDEC and HUD requirements including OHHLHC policy guidance.

## **SP-70 Anti-Poverty Strategy – 91.215(j)**

### **Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families**

Many of the programs and activities outlined in the 5 Year Strategy are related to reducing poverty. Housing activities responsive to those with special needs (such as the elderly and physically disabled) are geared toward those most in need, while others, including promotion of homeownership, Section 3 outreach and contracting, and contractor training education are long terms strategies to combat poverty. These include the following:

Section 3 outreach- Shelby County Department of Housing intends to continue coordinating with the Shelby County Department of Equal Opportunity Compliance (EOC) and Shelby County Department of Purchasing to recruit Section 3 contractors and vendors. As part of the overall vendor and EOC compliance process, vendors are provided with Section 3 certification information and asked to submit the information along with other vendor information. Businesses indicating that they are Section 3 are encouraged by the Department of Purchasing to bid on covered projects and are referred to the Department of Housing. Shelby County Department of Housing will continue to hold annual contractor meetings to inform contractors of Section 3 opportunities. All bid notices issued by the Shelby County Department of Housing will continue to encourage Section 3 participation. All contracts drafted by Shelby County Department of Housing will continue to include the Section 3 language to encourage contractors to further comply with Section 3 requirements.

Contractor training and certification- Shelby County Department of Housing intends to provide technical assistance to interested contractors with navigating how to obtain EPA RRP Certification as well as TDEC Lead Abatement Certifications for their business and staff. As training opportunities arise, SCDH will notify its contractor list and also make education pamphlets available to contractors as resources are available.

### **How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan**

The Section 3 outreach and contractor training initiatives planned by SCDH complement and directly support affordable housing activities in this plan. Particularly, the training and certification opportunities for Section 3 contractors and individuals help to expand the pool of new contractors and workers participating in the Lead hazard Control Program as well as the Housing Rehabilitation Program.

## **SP-80 Monitoring – 91.230**

**Describe the standards and procedures that the jurisdiction will use to monitor activities carried out in furtherance of the plan and will use to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements**

It has been, and will continue to be, SCDH's responsibility to monitor subrecipient organizations for compliance with federal, state, and local policies and regulations. SCDH will continue to monitor all subrecipients. SCDH routinely allocates CDBG funds to municipal governments in the Urban County Jurisdiction as well as local non-profit Community Housing Development Organizations (CHDOs). On all projects, SCDH holds award conferences upon notification of funding in order to ensure the recipients understand the responsibilities placed upon them. In the case of rehabilitation projects, pre-construction conferences are scheduled prior to the start of each job with the housing inspector, homeowner, and contractor. Prior to issuing payment for any goods provided or services rendered, SCDH verifies that the goods or services have been provided and program requirements have been met. For housing rehabilitation and minor home repair projects, SCDH staff will make periodic site visits as necessary and appropriate depending on the nature and scope of each activity. Before approving any partial or final reimbursements for such work, SCDH will inspect all work covered within the reimbursement request to insure it has been completed in accordance with SCDH specifications. For community development projects, SCDH staff will make at least one on-site monitoring visit to complete worker interviews for Davis-Bacon compliance purposes and to assess activity progress. For public service activities, SCDH staff will make periodic on-site monitoring visits to assess service delivery to the intended beneficiaries.

As an additional step, SCDH will continue to administer homeowner satisfaction surveys to those who receive assistance through the Shelby County Housing Rehabilitation and Minor Home Repair Programs. The homeowner satisfaction survey will continue to be used to monitor and gauge client satisfaction with the quality of work carried out under the Shelby County Rehabilitation and Lead Hazard Control Programs.

As opportunities arise to coordinate outreach efforts, such as in conjunction with efforts lead by the Shelby County Equal Opportunity Commission, SCDH will do so to encourage participation in SCDH bidding and contracting opportunities by minority and women owned business as well as Section 3 contractors.

Throughout the term of this 5 year Strategy, SCDH will be directly responsible for meeting all long-term Comprehensive Planning requirements including requirements related to planning, reporting, and citizen participation.



## Expected Resources

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

#### Introduction

Anticipated CDBG and HOME resources, including the PY2019 allocation and projected resources for the remaining term of the 5 Year Strategy (assuming level program funding), are shown below. SCDH proposes converting all CDBG program income received during each program into unallocated funds.

#### Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	1,189,423	10,000	0	1,199,423	4,807,692	These anticipated resources are based upon actual allocation amounts for PY2019

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	377,362	15,000	0	392,362	2,008,980	These anticipated resources are based upon actual allocation amounts for PY2019

Table 54 - Expected Resources – Priority Table

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

Federal funds will leverage additional resources including approximately \$100,000 in private funds through nonprofit CHDO developers receiving the HOME CHDO set-aside funds and approximately \$85,000 in local funds to meet HOME matching requirements.

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

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

**Discussion**

These anticipated resources are based upon actual allocation amounts for PY2019.

SCG was allocated \$15,083 fewer CDBG dollars and \$29,192 fewer HOME dollars than originally projected in the proposed Annual Plan.

As a result, CDBG Administration & Planning was scaled back in relation to the actual allocation. In order to adequately fund our three priorities with CDBG dollars (Housing Rehabilitation & Minor Home Repair, Community Development Projects, and Public Service Activities) CDBG Program Delivery was reduced by \$10,660.40. The HOME budget line items were scaled back in proportion to the actual allocation amount.

## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives

#### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Preserve Housing Affordability	2019	2023	Affordable Housing Non-Homeless Special Needs	Shelby County Urban County Entitlement Area Shelby County, Tennessee	Housing Rehabilitation & Minor Home Repair Affordable Housing	CDBG: \$508,945 HOME: \$382,928	Homeowner Housing Rehabilitated: 25 Household Housing Unit
2	Improve and Construct Public Facilities	2019	2023	Non-Housing Community Development	Shelby County Urban County Entitlement Area	Parks & Recreational Facilities Public Facilities Improvements	CDBG: \$200,000	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 100 Households Assisted
3	Provide Public Services	2019	2023	Non-Homeless Special Needs	Shelby County Urban County Entitlement Area	Public Services	CDBG: \$50,000 HOME: \$0	Public service activities for Low/Moderate Income Housing Benefit: 20 Households Assisted
4	Create Opportunities for Affordable Housing Choice	2019	2023	Affordable Housing Homeless Fair Housing	Shelby County Urban County Entitlement Area	Affordable Housing	CDBG: \$0 HOME: \$56,604	Homeowner Housing Added: 1 Household Housing Unit

**Table 55 – Goals Summary**

## Goal Descriptions

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

## Projects

### AP-35 Projects – 91.220(d)

#### Introduction

Anticipated CDBG and HOME resources, including the PY2019 allocation and projected resources for the remaining term of the 5 Year Strategy (assuming level program funding), are shown below. SCDH proposes applying all CDBG program income received during each program year toward high priority Community Development/Infrastructure Projects and/or Public Service Activities.

#### Projects

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

Table 56 – Project Information

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

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

## AP-38 Project Summary

### Project Summary Information

1	<b>Project Name</b>	Housing Rehabilitation/Minor Home Repair
	<b>Target Area</b>	Shelby County Urban County Entitlement Area Shelby County, Tennessee
	<b>Goals Supported</b>	Preserve Housing Affordability
	<b>Needs Addressed</b>	Housing Rehabilitation & Minor Home Repair Affordable Housing
	<b>Funding</b>	CDBG: \$508,945 HOME: \$382,928
	<b>Description</b>	Housing Rehabilitation or minor-home repair for low-and moderate-income owner-occupied homes including units under the Lead Hazard Control Program (Minor Home Repair).
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	25 low-and moderate-income owner-occupied households will benefit from the proposed activities.
	<b>Location Description</b>	To be determined based upon client intake/enrollment.
	<b>Planned Activities</b>	Rehabilitation of 25 owner-occupied houses to bring homes into code compliance and/or minor home repair to produce 15 lead safe housing units for families/households with children less than six years of age.
2	<b>Project Name</b>	Community Development/Infrastructure Projects
	<b>Target Area</b>	Shelby County Urban County Entitlement Area
	<b>Goals Supported</b>	Improve and Construct Public Facilities
	<b>Needs Addressed</b>	Parks & Recreational Facilities Public Facilities Improvements
	<b>Funding</b>	CDBG: \$200,000
	<b>Description</b>	Infrastructure or Community Development projects in the Urban County such as water/sewer improvements, ADA improvements to public facilities, and park/recreational facilities.
	<b>Target Date</b>	6/30/2019

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The number of families that will benefit is to be determined based upon location and service area of the project(s); approximately 50 families.
	<b>Location Description</b>	
	<b>Planned Activities</b>	Planned activities include the following to address high priority community development needs:  Sewer improvements in Collierville  Park/recreational facility in Millington; Millington South Park
<b>3</b>	<b>Project Name</b>	Public Service Activities
	<b>Target Area</b>	Shelby County Urban County Entitlement Area
	<b>Goals Supported</b>	Provide Public Services
	<b>Needs Addressed</b>	Public Services
	<b>Funding</b>	CDBG: \$50,000
	<b>Description</b>	Public Services activities in the Urban County to benefit special needs populations.
	<b>Target Date</b>	6/30/2019
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	10 elderly households will benefit from recreational services provided to senior citizens in the Urban County.
	<b>Location Description</b>	Within the Urban County at Senior Centers and/or Community Centers.
<b>Planned Activities</b>	Fine arts classes (such as painting, music, crafts, etc.), educational classes, job training classes, or entertainment for Senior Citizens.	
<b>4</b>	<b>Project Name</b>	CHDO Affordable Housing Development
	<b>Target Area</b>	Shelby County Urban County Entitlement Area
	<b>Goals Supported</b>	Create Opportunities for Affordable Housing Choice
	<b>Needs Addressed</b>	Affordable Housing
	<b>Funding</b>	HOME: \$56,604
	<b>Description</b>	Development of affordable housing by a CHDO using HOME CHDO set-aside funds.
	<b>Target Date</b>	6/30/2019



	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	One low/moderate income homebuyer is expected to benefit from this activity.
	<b>Location Description</b>	To be determined.
	<b>Planned Activities</b>	Acquisition and rehabilitation of a vacant housing unit to create and affordable housing unit for sale to a qualifying low/moderate income homebuyer.
<b>5</b>	<b>Project Name</b>	Program Delivery
	<b>Target Area</b>	Shelby County Urban County Entitlement Area
	<b>Goals Supported</b>	Preserve Housing Affordability Improve and Construct Public Facilities Provide Public Services
	<b>Needs Addressed</b>	Housing Rehabilitation & Minor Home Repair Parks & Recreational Facilities Public Services Public Facilities Improvements
	<b>Funding</b>	CDBG: \$202,594
	<b>Description</b>	Implementation of CDBG programs.
	<b>Target Date</b>	6/30/2019
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Not applicable.
	<b>Location Description</b>	Not applicable.
	<b>Planned Activities</b>	Not applicable.
<b>6</b>	<b>Project Name</b>	Administration and Planning
	<b>Target Area</b>	Shelby County Urban County Entitlement Area
	<b>Goals Supported</b>	Preserve Housing Affordability Improve and Construct Public Facilities Provide Public Services Create Opportunities for Affordable Housing Choice

<b>Needs Addressed</b>	Housing Rehabilitation & Minor Home Repair Parks & Recreational Facilities Public Services Public Facilities Improvements Affordable Housing
<b>Funding</b>	CDBG: \$237,885 HOME: \$37,736
<b>Description</b>	General administrative and planning activities necessary to operate HOME and CDBG programs.
<b>Target Date</b>	6/30/2019
<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Not applicable.
<b>Location Description</b>	Not applicable.
<b>Planned Activities</b>	Not applicable.

## **AP-50 Geographic Distribution – 91.220(f)**

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

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

### **Geographic Distribution**

<b>Target Area</b>	<b>Percentage of Funds</b>
Shelby County Urban County Entitlement Area	85
Shelby County, Tennessee	15

**Table 57 - Geographic Distribution**

### **Rationale for the priorities for allocating investments geographically**

SCDH does not propose emphasizing target areas or strategy areas as part of this Strategic Plan. This is primarily because concentrations of low- and moderate-income areas in the jurisdiction are limited, low- and moderate-income area and households are spread throughout the jurisdiction, and assistance is allocated based upon population data from each of the 6 municipalities within the jurisdiction. The Shelby County Urban Entitlement Area is a diverse community including a mixture of suburban and rural development. Fair Housing activities and Minor Home Repair in support of the 2016 Lead Hazard Control Grant will be conducted on a county-wide basis. It is estimated that no more than 15% of funds will be used on a county-wide basis.

### **Discussion**

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

## Affordable Housing

### AP-55 Affordable Housing – 91.220(g)

#### Introduction

SCDH has a one year affordable housing goal to assist 26 households through rehabilitation which includes housing rehabilitation projects in the Urban County, units receiving minor home repair to address lead-based paint hazards, and affordable housing developed through the use of CHDO funds. Additionally, as part of the 26 complete housing rehabilitation projects in the Urban County, SCDH has established an associated and linked one year affordable housing goal that 5 of these households will be non-homeless special needs households.

SCDH has also established a one year affordable housing goal to acquire one existing housing unit using CHDO set aside funds. It is anticipated that awarded CHDO funds beyond the cost of acquisition may be applied to eligible rehabilitation costs associated with the acquired unit.

<b>One Year Goals for the Number of Households to be Supported</b>	
Homeless	0
Non-Homeless	21
Special-Needs	5
Total	26

**Table 58 - One Year Goals for Affordable Housing by Support Requirement**

<b>One Year Goals for the Number of Households Supported Through</b>	
Rental Assistance	0
The Production of New Units	0
Rehab of Existing Units	25
Acquisition of Existing Units	1
Total	26

**Table 59 - One Year Goals for Affordable Housing by Support Type**

#### Discussion

SCDH's one year affordable housing goals will be carried out through housing rehabilitation and minor home repair as well as through HOME CHDO set aside funds. Since SCDH is not a recipient of Continuum of Care funds, resources to directly support the homeless are unavailable.

## **AP-60 Public Housing – 91.220(h)**

### **Introduction**

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

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

In Program Year 2019, The Shelby County Department of Housing will continue its efforts to serve the needs of extremely low-income, low-income, and moderate-income families residing in the jurisdiction served by the Millington Housing Authority.

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

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

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

Neither PHA is designated as troubled.

### **Discussion**

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

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

### **Introduction**

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

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

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

N/A

#### **Addressing the emergency shelter and transitional housing needs of homeless persons**

Memphis has identified the need for low-barrier emergency shelters, and specifically additional beds for single women and families with children. There are no free shelters in Memphis and Shelby County for men. The RHY funding stream for emergency shelter beds for youth did not get renewed either. Memphis has worked diligently with independent shelters and faith-based groups to encourage a low-barrier approach as well as swiftly accessing the new Coordinated Entry System. Outreach has a specific plan for going to emergency shelters in order to do the vulnerability assessments and engage with consumers that may be too vulnerable to access the system on their own. With the increase of youth-specific programs, Memphis has also been able to provide other emergency solutions such as hotel stays for those not old enough to enter a shelter. Memphis Department of Corrections as well as multiple hospitals now inform CAFTH when they are taking someone to emergency shelter, so they can be proactive on the front and in getting them into Coordinated Entry.

#### **Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again**

Coordinated Entry allows the City of Memphis CoC to not only house swiftly, but appropriately. Through outreach and case conferencing Memphis is assigning units for success. With that referral comes prior months of case management, transition planning, and resource access. The Memphis programs work hard to maintain and grow their connection to local resources and services, so clients have a comprehensive support system in place in conjunction with their housing. Through weekly meetings,

they are able to identify open units quickly and often in advance of the vacancy. Placement happens in real-time, and homeless persons are moved in efficiently. Case management entails goals and regular progress assessments to ensure stability and future prevention. The permanent supportive housing programs maintain a 95% housing retention rate.

Catholic Charities of West Tennessee and Memphis Area Legal Services are two Rapid Rehousing initiatives that focus on single adults under the Supportive Services for Veteran Families (SSVF) program. OUTMemphis provides Rapid Rehousing for LGBTQ youth ages 18-24 who are experiencing literal homelessness or couch-surfing and per HUD are classified as unstably housed. Families receiving assistance through this initiative, along with the 4 other Rapid Rehousing programs operated by non-veteran specific service providers give the Memphis CoC an opportunity for a no-wrong door approach. Walk-ins are immediately assessed for vulnerability, thereby offering early intervention and shorter homeless episodes than other individuals and families.

The Memphis CoC continues to maintain a Housing First Assertive Community Treatment (ACT) team. The team provides intensive, integrated treatment for dually diagnosed chronically homeless individuals who reside in permanent housing. This team, supervised by Alliance Healthcare Services (AHS), includes mental health professionals, physical health professionals, case managers, and peer support specialists. With the expiration of the SAMHSA CABHI grant, the ACT team has covered the need for ongoing case management on not only some of those CABHI clients, but new clients through Coordinated Entry as well. AHS serves at least 80 individuals who are housed with permanent housing providers. The services we expect that people leaving institutions will need are housing, community based mental health counseling and treatment, physical health care, employment services, substance abuse counseling and treatment, disability benefit application assistance, and legal advocacy/services.

The Memphis CoC has worked with the Department of Human Services (DHS) and Workforce Investment Network (WIN) to develop ongoing partnerships and to leverage resources. The Department of Children's Services (DCS) is a key partner in our family-specific permanent supportive housing program, which has the capacity of 69 units. School liaisons are now very active in our CoC committees and strategic planning. The youth advisory board and youth committee also focus on prevention for transition age youth and foster care extension.

The Memphis CoC also hosts an Emergency Housing Partnership Committee, which focuses solely on the family's homeless system and its performance and sustainability. Emergency Shelters, service providers, and housing programs specific to families discuss resources, enhancements, performance measures, and capacity barriers. Hotline calls are monitored to ensure no family is ever left outside.

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

The Memphis and Shelby County Coordinated Entry System has partnered with hospitals and jails to avoid street homeless episodes during discharge, as well as housing solutions and quick placement. Hospital staff is trained on the vulnerability assessment and attend Coordinated Entry meetings to identify those in future need of homeless assistance. Other partnerships, including local crisis hospitals and DCS continue to improve. We have developed a collaborative partnership with the DCS Regional Administrator. DCS has a funding mechanism that can be used to pay rental assistance to families whose only barrier to family reunification is homelessness. CAFTH and MIFA are working with DCS to make client referrals to both rapid rehousing and permanent supportive housing. The Memphis Coc also continue to work with the state DCS to develop a mechanism to prevent homelessness for youth aging out of foster care.

The Memphis CoC has an ongoing pilot with a local hospital to design and implement a service pathway that effectively addresses housing and supportive service needs by leveraging CAFTH's Coordinated Entry System. Using a hospital, homeless specific navigator, and homeless patients are flagged and assessed for vulnerability on the front end. They also have user licenses to the Homeless Management Information Systems database, to better connect existing clients and new clients as well.

The Emergency Housing Partnership referred 8 families for Emergency Solutions Grant funding, with 4 being served through that funding. In 2018, MIFA's central intake received 19,421 requests for assistance, and screened 30,011 families with 5,850 client/staff interactions. MIFA also provided emergency services including rent, mortgage or utility assistance to prevent homelessness. 357 families were served through RRH assistance, with 7,356 hotel/motel nights paid for by MIFA in addition to emergency shelter referrals. 274 families were successfully mediated to avoid homelessness. MIFA also triaged 7,499 homeless hotline calls, with 73 referred to the Domestic Violence hotline.

The Memphis CoC would still like to secure funding and a non-profit sponsor that could provide respite care to those who are homeless and have had or are awaiting surgery or other medical procedures that make it unsafe for them to discharge to homelessness.

## **Discussion**

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



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

### **Introduction:**

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

#### **1) Segregation persists.**

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

#### **2) Disparities in housing needs.**

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

#### **3) Disparities in access to opportunity.**

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

#### **4) Barriers to housing choice for people with disabilities.**

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

#### **5) Location and utilization of publicly assisted housing**

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

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

The City of Memphis and Shelby County identified the following goals and strategic partnership

opportunities (see Figure VIII-1 in SP-55) to address fair housing concerns in the region. Figure VIII-1 lists those goals and partnership opportunities along with the fair housing issue to be addressed by each goal. Unless otherwise specified, both the City and the County intend to pursue the stated goal.

In year 1, SCDH will continue to implement its Rehabilitation Program (Goal 1A) and Down Payment Assistance Programs (Goal 2B). SCDH will also create affordable housing opportunities through partnership with a local non-profit by using HOME CHDO set-aside funds (Goal 1C). Additionally, SCDH will implement a post-rehabilitation counseling program aimed at clients who go through the SCDH Rehabilitation Program. 2 staff members will also be trained and certified as HUD Housing Counselors in an effort for the department to become a HUD Certified Housing Counseling Agency (Goal 2A).

**Discussion:**

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

## **AP-85 Other Actions – 91.220(k)**

### **Introduction:**

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

### **Actions planned to address obstacles to meeting underserved needs**

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

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

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

### **Actions planned to foster and maintain affordable housing**

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

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

These goals will be accomplished through the 1) rehabilitation of housing in the Urban County, 2) addressing lead-based paint hazards (including repairs to address deteriorated painted surfaces) in eligible homes in Shelby County having children less than 6 years of age, and 3) the development of affordable housing by a CHDO using HOME CHDO set-aside funds.

### **Actions planned to reduce lead-based paint hazards**

SCDH will continue to implement the Lead Hazard Control Program to address lead-based paint hazards in Shelby County homes having children less than 6 years old. CDBG funds as described in the

“Anticipated Resources” subsection will be used as match to supplement these efforts. Additionally, all pre-1978 housing rehabilitated using CDBG or HOME funds (including CHDO funds) will be evaluated for the presence of lead-based paint hazards. As with the units assisted using Lead Hazard Control Funds, Risk Assessors certified by the Tennessee Department of Environment and Conservation (TDEC) will complete paint inspections using X-ray Fluorescence (XRF devices) and collect environmental samples that will be used to complete a Risk Assessment to identify all lead-based paint hazards and provide recommendations to address the hazards. Methods to address hazards may be in the form of interim control, abatement, or a combination of the two based on considerations including budgets, energy efficiency, Lead Safe Housing Rule requirements, and other state, federal, and local requirements.

### **Actions planned to reduce the number of poverty-level families**

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

Working with nonprofit organizations, other branches of government, other governmental agencies, and citizen committees, the agency plans and carries out programs for low-income residents. These programs emphasize self-help. Most recently, CSA assisted 18,035 households and 41,862 individual utility customers in a 12 month period through their Low Income Energy Assistance Program.

### **Actions planned to develop institutional structure**

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

During the 2019 Program Year, SCDH will continue to take advantage of upcoming training opportunities

for staff directly involved in the delivery and administration of funds. SCDH will also provide training to the staff of its Urban County partners as requested in order to insure that participating municipalities are aware of their responsibilities under the entitlement programs.

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

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

**Discussion:**

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

## Program Specific Requirements

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

**Introduction:**

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

#### Community Development Block Grant Program (CDBG)

##### Reference 24 CFR 91.220(I)(1)

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

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

#### Other CDBG Requirements

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

**HOME Investment Partnership Program (HOME)**  
**Reference 24 CFR 91.220(l)(2)**

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

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

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

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

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

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

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

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

deeds of trust, mortgages, and deed restrictions.

When the initial homebuyer sells the HOME assisted unit to a non-eligible family, the seller will be entitled to pay-off of first/second mortgages, recover investment (or downpayment), and documented capital improvements expenses in that order. If proceeds remain, SCDH shall recapture the pro rata share of HOME subsidy that remains on a straight-line declining basis.

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

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

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

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

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

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

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



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

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

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

## Attachments

## Citizen Participation Comments

### Shelby County 5 Year Strategy and Annual Action Plan Summary of Citizen Participation Comments and Responses

**Comment:** Beverly Ross, a resident of Memphis, called on 3/28/2019 to ask why the scheduled public hearings weren't being held at locations within the city of Memphis, specifically the main library. Ms. Ross cited transportation barriers as the cause for concern and a deterrent to attendees. Ms. Ross saw the public notice in the *Memphis Flyer* on 3/28/2019 promoting public hearings on the proposed 5 year strategy and annual action plan.

**Response:** SCDH staff explained to Ms. Ross that the Shelby County Entitlement Community is comprised of the county outside of the city of Memphis. The public hearings had been scheduled in locations convenient to members of the Urban County (Bartlett Library, Collierville Library, and offices at Shelby County Government) to encourage the intended beneficiaries of the proposed 5-year strategy and Annual Action Plan to attend. Ms. Ross was advised that the City of Memphis is an entitlement community and that their proposed 5-year strategy and Annual Action Plan were being developed and a public hearing would follow. Ms. Ross was encouraged to contact the City of Memphis Housing and Community Development (HCD) office in order to get information on their consolidated planning efforts. Ms. Ross declined to take contact information for the City of Memphis's HCD.

## ALL ADS OF PUBLIC NOTICES CONCERNING THE 5 YEAR STRATEGY AND ANNUAL ACTION PLAN

**COST OF PUBLICATION**

**Total                    \$120.00**

**PUBLIC NOTICE  
SHELBY COUNTY DEPARTMENT OF  
HOUSING  
CONSOLIDATED PLAN FOR FY 2020-  
2024 AND  
FISCAL YEAR 2020 ANNUAL ACTION  
PLAN PUBLIC HEARING**

Shelby County Department of Housing will hold a public hearing to discuss Shelby County housing and community development needs in preparation for the Consolidated Plan for FY 2020 through 2024 as well as the Fiscal Year 2020 Annual Action Plan (HUD Program Year 2019) at the following date, time and location:  
Thursday, January 31, at 5:30 p.m. Shelby County Code Enforcement, Training Room, 6405 Mullins Station Road Memphis, TN 38134. Attendees should enter the Code Enforcement Building through the Training Room entrance; upon walking up to the building, attendees will need to follow the signage that leads to the Training Room.  
If you plan to attend the public hearing and have special needs, please contact the Department of Housing at 901-222-7600 by 4:30 p.m. Thursday, January 24, 2019 and we will work to accommodate you. Citizen input and public participation is strongly encouraged.  
The consolidated planning process for FY 2020-2024 serves as the framework for communitywide dialogue to identify housing and community development priorities that align and focus funding from the CPD formula block grant programs Community Development Block Grant (CDBG) and HOME Investment Partnerships (HOME) Program. The FY 2020 Annual Action Plan establishes the basis for the use of restoration funds for the period of July 1, 2019 – June 30, 2020. The primary purpose of this hearing is to receive comments on community development needs in order to consider them in the consolidated

planning process for the FY 2020-2024 Consolidated Plan as well as for the FY 2020 Annual Action Plan. Shelby County anticipates receiving level funding for the upcoming program year; \$1,204,506 in CDBG and \$406,554 in HOME funds in Program Year 2019. Shelby County expects to submit the Consolidated Plan for FY 2020-2024 and the Annual Plan for FY 2020 to HUD on or before May 15, 2019 following a 30 day review and comment period.  
The hearing will also provide an update on current activities under the CDBG and HOME Programs, information on Section 3 contracting opportunities; and will provide information on other programs operated by the Department of Housing.  
Persons wishing to comment on the Consolidated Plan for FY 2020-2024 and/or the FY 2020 Annual Action Plan may do so by writing to Ms. Sydney Wright (Sydney.wright@shelbycountytg.gov), Shelby County Department of Housing, 1075 Mullins Station Road, Memphis, TN 38134. Shelby County will schedule an additional public hearing in April 2019 to present the draft Consolidated Plan for FY 2020-2024 and the Annual Action Plan for FY 2020 for public comment before it is submitted to HUD. For additional information contact the Department of Housing at 901-222-7600 or TTY at 901-222-2300.  
The Shelby County Department of Housing does not discriminate on the basis of race, color, national origin, sex, religion, age or disability in employment or the provision of services. Equal opportunity/ equal access provider.  
Please visit information on Spanish, per favor name at 901-222-4289.  
Lee Harris  
Mayor  
Scott Welkup, Administrator  
Shelby County Department of Housing  
Jan. 17, 2019                    Mod06913

**PROOF OF PUBLICATION**

THE DAILY NEWS PUBLISHING COMPANY, the Publisher of THE DAILY NEWS, a daily newspaper of general circulation, printed in the City of Memphis, County of Shelby and State of Tennessee and distributed throughout Shelby Counties in Tennessee, and states that the hereto attached publication appeared in THE DAILY NEWS on the following dates:

**January 17, 2019**

**THE DAILY NEWS PUBLISHING COMPANY**

By:   
**Kendra Wooten, Administrative Specialist**

**STATE OF TENNESSEE  
COUNTY OF SHELBY**

On this 17th day of **January 2019**, the individual above appeared before me, personally known (or proved to me on the basis of satisfactory evidence), who, being by me duly sworn did say that she is an authorized agent of the corporation (or association) of the Daily News Publishing Company, that the instrument was signed and sealed on behalf of the corporation (or association), by authority of its Board of Directors and **Kendra Wooten** acknowledged the instrument to be the free act and deed of the corporation (or association) and that the corporation has no corporate seal.

WITNESS my hand and Official Seal at office this  
**17th day of January 2019.**


**PUBLIC NOTICE  
SHELBY COUNTY DEPARTMENT OF HOUSING  
CONSOLIDATED PLAN FOR FY 2020-2024  
AND FISCAL YEAR 2020 ANNUAL ACTION  
PLAN PUBLIC HEARING**

Shelby County Department of Housing will hold a public hearing to discuss Shelby County housing and community development needs in preparation for the Consolidated Plan for FY 2020 through 2024 as well as the Fiscal Year 2020 Annual Action Plan (HUD Program Year 2019) at the following date, time and location:

Thursday, January 31 at 5:30 p.m. Shelby County Code Enforcement, Training Room, 6465 Mullins Station Road Memphis, TN 38134. Attendees should enter the Code Enforcement Building through the Training Room entrance; upon walking up to the building, attendees will need to follow the signage that leads to the Training Room.

If you plan to attend the public hearing and have special needs, please contact the Department of Housing at (901) 222-7600 by 4:30 p.m. Thursday, January 24, 2019 and we will work to accommodate you. Citizen input and public participation is strongly encouraged.

The consolidated planning process for FY 2020-2024 serves as the framework for a community-wide dialogue to identify housing and community development priorities that align and focus funding from the CPD formula block grant programs Community Development Block Grant (CDBG) and HOME Investment Partnerships (HOME) Program. The FY 2020 Annual Action Plan establishes the basis for the use of entitlement funds for the period of July 1, 2019 – June 30, 2020. The primary purpose of this hearing is to receive comments on community development needs in order to consider them in the consolidated planning process for the FY 2020-2024 Consolidated Plan as well as for the FY 2020 Annual Action Plan. Shelby County anticipates receiving level funding for the upcoming program year; \$1,204,506 in CDBG and \$406,554 in HOME funds in Program Year 2019. Shelby County expects to submit the Consolidated Plan for FY 2020-2024 and the Annual Plan for FY 2020 to HUD on or before May 15, 2019 following a 30-day review and comment period.

The hearing will also provide an update on current activities under the CDBG and HOME Programs, information on Section 3 contracting opportunities; and will provide information on other programs operated by the Department of Housing.

Persons wishing to comment on the Consolidated Plan for FY 2020-2024 and/or the FY 2020 Annual Action Plan may do so by writing to Ms. Sydney Wright (Sydney.wright@shelbycountytg.gov), Shelby County Department of Housing, 1075 Mullins Station Road, Memphis, TN 38134. Shelby County will schedule an additional public hearing in April 2019 to present the draft Consolidated Plan for FY 2020-2024 and the Annual Action Plan for FY 2020 for public comment before it is submitted to HUD. For additional information contact the Department of Housing at 901-222-7600 or TTY at 901-222-2300.

The Shelby County Department of Housing does not discriminate on the basis of race, color, national origin, sex, religion, age or disability in employment or the provision of services. Equal opportunity/equal access provider.

Para más información en Español, por favor llame al 901-222-4289.

Lee Harris  
Mayer

Scott Walkup, Administrator  
Shelby County Department of Housing

Memphis Flyer January 17-23, 2019 44



**THANK YOU**  
MEMPHIS & THE MID-SOUTH

YOUR GENEROSITY EXCEEDED OUR GOAL AND YOU GAVE  
\$700,000! THIS WILL TRANSLATE INTO HUNDREDS OF  
ASSISTED FAMILIES AND INDIVIDUALS IN OUR CITY.

@SAVATIONARMYMEMPHERIS

**NOTICE OF PROPOSED CLASS ACTION SETTLEMENT AND RELEASE OF CLAIMS**

**IF YOU BURIED A FAMILY MEMBER AT GALLIE MEMORIAL GARDENS CEMETERY ("GALLIE") OR YOU PAID FOR A BURIAL AT GALLIE FROM JANUARY 1, 2011 THROUGH JANUARY 31, 2014**

**PLEASE READ THIS CAREFULLY. YOUR LEGAL RIGHTS WILL BE AFFECTED**

This Notice is to let you know about a proposed partial settlement of a class action lawsuit against three funeral homes in the South-Central Region of the U.S. (Atlanta Atlanta Funeral Home, Inc. et al.; Clark Co. Crematory, Inc. ("Clark Crematory"); The Home Depot of the South-Central Region, Inc. et al. ("Home Depot"). To learn more about this partial settlement or to obtain a copy of the Class Action Settlement Agreement ("Settlement Agreement"), you may call 901-499-0000 or visit our website at [www.gallie.com](http://www.gallie.com). If you are unable to call or visit our website, you may call 901-499-0000 and those documents will be mailed to you. The folks entitled to get money out of this settlement are called Class Members in this Notice.

**Summary of the Settlement Terms**

Three funeral homes have agreed to settle the proposed lawsuit and pay Class Members \$1,000,000 (the "Settlement Amount"). The lawyers handling the case for Class Members are going to ask Memphis Circuit Court Judge Kyle to award \$2,000,000 from the settlement funds to the funeral homes that helped get some Class Members to bury someone they were told was dead (but never got money for the burials) or to take care of someone who was never buried. The lawyers working on this case have made their best effort to get the best deal for Class Members. They have spent about \$400,000 paying expenses on the case out of their own money. These lawyers are going to ask the Court to pay \$175,000 which equals 8.75% of the Settlement Amount or 8.75% of the total legal fee and are going to ask to be paid back their expenses. Class Member Kyle will consider all of this and he gets to decide how much the lawyers will be paid in this case.

Class Member Kyle will have a final hearing on this partial settlement to consider whether it's fair and should be approved or rejected. This is a good opportunity for Class Members to get to know the lawyers who are representing you in this case. The final hearing will take place at Class Member Kyle's convenience at the Shelby County Courthouse on Adams Avenue at 10:00 a.m. on March 4, 2019. Until Class Member Kyle decides about the lawyers' fees and expenses, no one will get any money from this settlement.

In order to get any money from this settlement, you must have buried a family member at Gallie or paid for the burial of someone at Gallie between January 1, 2011 and January 31, 2014 and you must file out and mail in a Class Action Form by July 15, 2019. You need to mail in a CMR Settlement Solution, P.O. Box 54033, Memphis, Tennessee 38144.

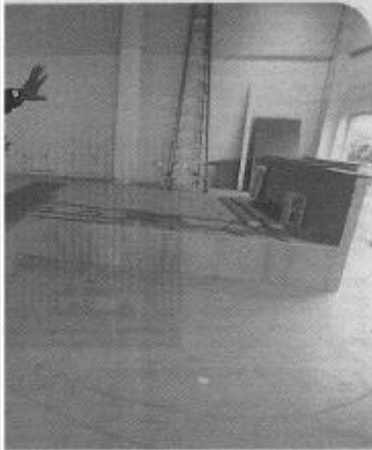
You can have your own lawyer and object to the settlement if you don't like it. The settlement that your lawyer objects to is a CMR Settlement Solution by February 15, 2019. If Class Member Kyle approves the settlement or is FINAL, you will be paid what it says and the three settling funeral homes will be authorized from all liability in this case. The case against the rest of the funeral homes will continue to go forward and you might get more money from them later depending on a court's ruling.

If you have any questions, you may call 901-499-0000 or you may visit [www.gallie.com](http://www.gallie.com). You may get a copy of a Class Action Form on the website. If you don't have the internet, please call 901-499-0000 and someone will help you get the forms you need to get money from this settlement.

**PLEASE DO NOT CALL OR WRITE THE COURT, THE CLERK'S OFFICE,  
OR ANY DEFENDANT ABOUT THIS NOTICE OR THE SETTLEMENT.  
ONLY CMR SETTLEMENT SOLUTIONS HAS THE INFORMATION YOU  
NEED TO FILE A CLAIM**

Para más información en Español, por favor llame al 901-499-0000 o visite nuestra web en [www.gallie.com](http://www.gallie.com).

# s del Ejército de serán remodelados Buildings to be Remodeled



Journal) ha tenido en tres recibidos de su Ejército de Acción Comunitaria. Las campañas del Ejército de Acción Comunitaria se llevan a cabo por períodos de tiempo. Los servicios de espacio, instalaciones y renovación en el edificio de acción comunitaria se han recaudado un aumento en las matrículas de más allá de lo recaudado en la financiación de las actividades adicionales. El comentario donde se encuentra el sistema de iluminación y techos y

## ENGLISH

TUPELO, MS (The Daily Journal) — The Salvation Army has not had any significant remodeling in three decades, but the facility will receive upgrades to every building on its campus this year. Maj. Jeff Daniel with the Salvation Army said construction began in May of last year. The renovations are part of the Salvation Army's large-scale capital campaign, which happens every 20 to 30 years. Daniel said these campaigns are done so infrequently because facilities are meant to remain fit for operation for a long time, but with growing services and a growing need for space, it was time to expand the current Salvation Army facility in Tupelo. The capital campaign raised \$2.5 million but due to the unanticipated increased costs for raw materials, construction costs for the project have increased beyond what was originally raised for the upgrades. The Salvation Army will fundraise to bridge the gap in funding and is looking to raise an additional \$1 million to \$1.5 million to finish the renovations. Every building will be renovated, starting with the community center where the offices and chapel are located now. The building will receive a new roof and sprinkler system, new lighting and air conditioning, new ceilings and floors, as well as paint.

## AVISO PÚBLICO AUDIENCIA PÚBLICA PARA EL PLAN CONSOLIDADO DEL AÑO FISCAL 2020-2024 Y PARA EL PLAN DE ACCIÓN ANUAL DEL AÑO FISCAL 2020 DEL DEPARTAMENTO DE VIVIENDA DEL CONDADO DE SHELBY

El Departamento de Vivienda del Condado de Shelby llevará a cabo una audiencia pública para discutir las necesidades de vivienda y desarrollo comunitario del Condado de Shelby en la preparación del Plan Consolidado para el Año Fiscal 2020 hasta el 2024, así como del Plan de Acción Anual para el Año Fiscal 2020 (Programa "HUD" del Año 2019), en la siguiente fecha, hora y lugar:

El jueves, 31 de enero, a las 5:30 p.m. en el Training Room del edificio de Shelby County Code Enforcement, ubicado en el 8465 Mullins Station Road Memphis, TN 38134. Los asistentes deben entrar al Edificio de Code Enforcement (Code Enforcement Building) usando la entrada a la Sala de Capacitación (the Training Room entrance); al caminar hacia el edificio, los asistentes deberán seguir la señalización que conduce a la Sala de Capacitación.

Si va a asistir a la audiencia pública y tiene necesidades especiales, por favor póngase en contacto con el Departamento de Vivienda llamando al (901) 222-7600 el jueves, 24 de enero del 2019, antes de las 4:30 p.m., y nosotros haremos lo posible para acomodarlo. Aportaciones de los ciudadanos y la participación del público es altamente recomendable.

El proceso de planificación consolidada para el Año Fiscal 2020-2024 sirve como marco para un diálogo a nivel comunitario para identificar cuáles son las prioridades de vivienda y desarrollo comunitario que se alinean y poder dirigir así los fondos de los programas de fórmula CPD, como el Community Development Block Grant (CDBG) y HOME Investment Partnerships (HOME). El Plan de Acción Anual del Año Fiscal 2020 establece las bases para el uso de los fondos autorizados para el período del 1 de julio del 2019 al 30 de junio del 2020. El objetivo principal de esta audiencia es recibir comentarios sobre las necesidades de desarrollo comunitario para luego considerarlos en el proceso de planificación consolidada para el Plan Consolidado del Año Fiscal 2020-2024, así como en el Plan de Acción Anual del Año Fiscal 2020. El Condado de Shelby anticipa recibir fondos nivelados para el próximo año del programa: \$1,204,506 en CDBG y \$406,554 en fondos de HOME en el año 2019 del programa. El Condado de Shelby espera presentar el Plan Consolidado para el Año Fiscal 2020-2024 y el Plan de Acción Anual para el Año Fiscal 2020 a HUD antes del 15 de mayo del 2019, luego de un período de revisión y comentarios de 30 días.

La audiencia también proporcionará una actualización sobre las actividades en curso en los programas de CDBG y HOME, y dará información sobre las oportunidades de contratación de la Sección 3; también dará información sobre otros programas operados por el Departamento de Vivienda.

Las personas que deseen hacer comentarios sobre el Plan Consolidado para el Año Fiscal 2020-2024 y/o el Plan de Acción Anual para el Año Fiscal 2020 pueden hacerlo escribiendo a la Sra. (Ms.) Sydney Wright (Sydney.wright@shelbycountytn.gov), del Departamento de Vivienda del Condado de Shelby (Shelby County Department of Housing), ubicado en el 1075 Mullins Station Road, Memphis, TN 38134. El Condado de Shelby programará una audiencia pública adicional en abril del 2019 para presentar el Borrador del Plan Consolidado para el Año Fiscal 2020-2024 y del Plan de Acción Anual para el Año Fiscal 2020 y recibir así la opinión pública sobre los mismos antes de que estos sean presentados a HUD (The United States Department of Housing and Urban Development/ Departamento de Vivienda y Desarrollo Urbano de Estados Unidos). Para obtener información adicional, comuníquese con el Departamento de Vivienda al 901-222-7600 o TTY al 901-222-2300.

El Departamento de Vivienda del Condado de Shelby no discrimina en base a raza, color, origen nacional, sexo, religión, edad o discapacidad en el empleo o la prestación de servicios. También es un proveedor de igualdad de oportunidades/acceso a la igualdad.

Para más información en español, por favor llamar al 901-222-4289.

Lee Harris, Alcalde

Scott Walkup, Administrador  
Departamento de Vivienda del Condado de Shelby

# CLASSIFIEDS

race, sex, religion, color, national or ethnic origin, age, disability or military service.

By order of

**LEE HARRIS, MAYOR**  
SHELBY COUNTY  
GOVERNMENT

### NOTICE TO BIDDERS)

Sealed bids will be received by the Shelby County Government in the Department of Housing, 1075 Mullins Station Road, Memphis, Tennessee 38134 until 9:30 a.m. on January 31, 2019, as shown below.

**MULTIPLE AND ENTIRELY DIFFERENT REHABILITATION JOBS ARE CONTAINED IN THIS BID NOTICE. BIDDERS MAY ELECT TO BID ON ANY OR ALL OF THE JOBS IN THE NOTICE. SEALED BID 000546 DUE: January 31, 2019**

1. Rehabilitation of Owner-Occupied Housing Units throughout Shelby County some of which may require the use of lead based paint safe work practices and techniques; and
2. Lead-Based Paint Hazard Reduction Jobs.

Detailed specifications for some items may be obtained in the Shelby County Department of Housing at the aforementioned address beginning January 17, 2019. All bids will be opened and publicly read by the Shelby County Government at the time mentioned above at the Department of Housing, 1075 Mullins Station Road Memphis, TN 38134, (901) 222-7600, TTY Number (901) 222-2300, or for information in Spanish (901) 222-4319. Award recommendations will be posted at the following website: <http://www.shelbycountymn.gov/901/222-7600> Contract Opportunities upon review of the bid opening results.

As a condition precedent to bidding, each bidder must apply and qualify for a Vendor Number and Equal Opportunity Compliance Signatory Number prior to the submitting your response. Your EOC number must be displayed on the outside of your envelope for each bid submission.

As a condition precedent to being awarded jobs involving Lead-Based Paint, contractors must be certified through EPA as an RRP contractor and/or show proof of approval to EPA for lead certification and be certified through the State of Tennessee as a Lead Based Paint Firm. Proof of licensing at time of bid submission is required by the Shelby County Department of Housing.

**NOTE: Selected contractors will be required to check the SAM system to ensure that any subcontractors it selects do not appear on the debarred supplier registry.**

The label, which is attached to the need forecasts shall be completely filled out and attached to the bid submission envelope. You must display your current E.O.C. Signatory Number or your Locally Owned Small Business (L.O.S.B.) Number on the outside of your envelope and a copy of all licenses and insurance policies must be included in your submitted bid package. Unless the label is completely filled out and your current E.O.C. Signatory Number is noted thereon your bid may be returned to you unopened. Should your bid be lost or misplaced, please note the appropriate information in the lower left-hand corner of your envelope. **The Department of Housing encourages participation from**

### PUBLIC NOTICE SHELBY COUNTY DEPARTMENT OF HOUSING CONSOLIDATED PLAN FOR FY 2020-2024 AND FISCAL YEAR 2020 ANNUAL ACTION PLAN PUBLIC HEARING

Shelby County Department of Housing will hold a public hearing to discuss Shelby County housing and community development needs in preparation for the Consolidated Plan for FY 2020 through 2024 as well as the Fiscal Year 2020 Annual Action Plan (AAD) Program Year 2019 at the following date, time and location:

Thursday, January 31 at 5:30 p.m. Shelby County Code Enforcement, Training Room, 6466 Mullins Station Road Memphis, TN 38134. Attendees should enter the Code Enforcement Building through the Training Room entrance; upon walking up to the building, attendees will need to follow the signage that leads to the Training Room.

If you plan to attend the public hearing and have special needs, please contact the Department of Housing at (901) 222-7600 by 4:00 p.m. Thursday, January 24, 2019 and we will work to accommodate you. Citizen input and public participation is strongly encouraged.

The consolidated planning process for FY 2020-2024 serves as the framework for a community-wide dialogue to identify housing and community development priorities that align and focus funding from the CDBG formula, block grant programs Community Development Block Grant (CDBG) and HOME Investment Partnerships (HOME) Program. The FY 2020 Annual Action Plan establishes the basis for the use of entitlement funds for the period of July 1, 2019 – June 30, 2020.

The primary purpose of this hearing is to solicit comments on community development needs in order to consider them in the consolidated planning process for the FY 2020-2024 Annual Action Plan as well as for the FY 2020 Annual Action Plan. Shelby County anticipates receiving level funding for the upcoming program year: \$1,204,556 in CDBG and \$400,554 in HOME funds in Program Year 2019. Shelby County expects to submit the Consolidated Plan for FY 2020-2024 and the Annual Plan for FY 2020 to HUD on or before May 15, 2019 following a 30 day review and comment period.

The hearing will also provide an update on current activities under the CDBG and HOME Programs. Information on Section 3 contracting opportunities and will provide information on other programs operated by the Department of Housing.

Persons wishing to comment on the Consolidated Plan for FY 2020-2024 under the FY 2020 Annual Action Plan may do so by writing to Ms. Sydney Wright (Sydney.wright@shelbycountymn.gov), Shelby County Department of Housing, 1075 Mullins Station Road, Memphis, TN 38134. Shelby County will schedule an additional public hearing in April 2019 to present the draft Consolidated Plan for FY 2020-2024 and the Annual Action Plan for FY 2020 for public comment before it is submitted to HUD. For additional information contact the Department of Housing at (901) 222-7600 or TTY at (901) 222-2300.

The Shelby County Department of Housing does not discriminate on the basis of race, color, na-

### BY SHELBY COUNTY GOVERNMENT

Notice is hereby given, pursuant to T.C.A. §67-5-2507, that Shelby County Government has received an Offer to Purchase for the following property:

Samuel Chambers  
Tax Parcel #: 06006100002820  
Tax Sale #: 1501  
Price Offered: \$3000.00  
Terms: Cash

Additional Offers to Purchase, of at least ten percent (10%) higher, may be submitted within ten (10) working days of this notice. If additional offers are received during this ten (10) day period, all prospective Purchasers must attend a Public "Bid Off" at 9:00 a.m. on February 19, 2019, to be held in the Shelby County Land Bank Office, to determine the highest and best offer. The property shall hereafter be sold to the prospective Purchaser making the highest and best offer without warranties of any sort.

**SHELBY COUNTY LAND BANK**  
894 ADAMS AVENUE  
MEMPHIS, TN 38103  
MIKE BLACKWELL  
(901) 222-2841

### NOTICE OF PROPOSED SALE OF REAL PROPERTY BY SHELBY COUNTY GOVERNMENT

Notice is hereby given, pursuant to T.C.A. §67-5-2507, that Shelby County Government has received an Offer to Purchase for the following property:

Samuel Chambers  
Tax Parcel #: 06006100002820  
Tax Sale #: 1501  
Price Offered: \$3000.00  
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**SHELBY COUNTY LAND BANK**  
894 ADAMS AVENUE  
MEMPHIS, TN 38103  
MIKE BLACKWELL  
(901) 222-2841

### NOTICE OF PROPOSED SALE OF REAL PROPERTY BY SHELBY COUNTY GOVERNMENT

Notice is hereby given, pursuant to T.C.A. §67-5-2507, that Shelby County Government has received an Offer to Purchase for the following property:

Mirinda Padon  
Tax Parcel #: 08304100002520  
Tax Sale #: 1101  
Price Offered: \$50.00  
Terms: Cash

Additional Offers to Purchase, of at least ten percent (10%) higher, may be submitted within ten (10) working days of this notice. If additional offers are received during this ten (10) day period, all prospective Purchasers must attend a Public "Bid Off" at 10:30 a.m. on February 11, 2019, to be held in the Shelby





# COMMUNIT

**PUBLIC NOTICE  
SHELBY COUNTY DEPARTMENT OF HOUSING  
PROPOSED 5-YEAR CONSOLIDATED PLAN AND  
PROPOSED ANNUAL ACTION PLAN FOR FY20  
AMENDMENT TO THE CONSOLIDATED PLAN  
ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING**

The Shelby County Department of Housing (SCDH) has prepared a draft of the Federal 5-Year Consolidated Plan for Shelby County Fiscal Years 2019-2024 and the Annual Action Plan for Fiscal Year 2019 (July 1, 2019-June 30, 2020). The 5-Year Consolidated Plan addresses the proposal of funds received from the U.S. Department of Housing and Urban Development (HUD) during the current fiscal years 2019-2024. The Annual Action Plan for FY2019 (D Program Year 2019) is required by the U.S. Department of Housing and Urban Development (HUD) for the receipt of Community Development Block Grant (CDBG) and HOME (affordable housing) funds. The proposed annual action plan also includes a list of HUD projects to address housing and community development needs, especially needs in low-to-moderate income areas of Shelby County outside of the City of Memphis. As of this time, SCDH has not yet been notified of CDBG and HOME allocation amounts and is basing this proposed 5-Year Consolidated Plan and Annual Action Plan on an assumption of funding equal to the current Program Year 09/10 at \$1,204,306.00 in CDBG funds, \$16,000.00 in HOME Program income, \$466,594.00 in HOME grant funds, \$15,000.00 in HOME program income, and \$91,474.65 in local match funds for use during Shelby County's Fiscal Year 2020. The following table summarizes resources and expenditures in the Proposed Annual Plan for FY20.

Anticipated Resources	CDBG	HOME	Total Funds
Allocation	\$ 1,204,306.00	\$ 406,554.00	\$ 1,611,060.00
Match	\$ -	\$ 91,474.65	\$ 91,474.65
Program Income	\$ 10,000.00	\$ 15,000.00	\$ 25,000.00
<b>TOTAL AVAILABLE</b>	<b>\$ 1,214,306.00</b>	<b>\$ 513,028.65</b>	<b>\$ 1,727,334.65</b>

Project Name	CDBG	HOME	TOTAL
Housing Rehab/Minor Home Repair	\$ 508,944.80	\$ 411,390.15	\$ 920,334.95
CHDO Set-aside	-	\$ 60,983.30	\$ 60,983.30
Community Development Projects	\$ 200,000.00	\$ -	\$ 200,000.00
Public Service	\$ 50,000.00	\$ -	\$ 50,000.00
Program Delivery	\$ 212,660.00	\$ -	\$ 212,660.00
Administration and Planning	\$ 242,901.20	\$ 40,655.40	\$ 283,556.60
<b>TOTAL</b>	<b>\$ 1,214,306.00</b>	<b>\$ 513,028.65</b>	<b>\$ 1,727,334.65</b>

If these anticipated resources differ from actual 2019 Program Year allocations, SCDH proposes adjusting funding for each activity either up or down according to the following order of priority: Priority 1 - Housing Rehabilitation and Minor Home Repair; Priority 2 - Community Development Projects responsive to high-priority non-housing community development needs; and Priority 3 - Public Service Activities.

In addition to the 5-Year Consolidated Plan and Annual Action Plan, SCDH also proposes cancelling the following projects from the current FY2014-2019 5-Year Consolidated Plan: All Sewer Outfall Improvements in Collierville for APS, Downtown Collierville Greenbelt Trail in Collierville for APS, and All Sewer Culture Improvements in Collierville for APS. These projects do not remain a priority during the current 5-year Consolidated planning period. SCDH proposes amending the current Consolidated Plan by cancelling these projects and making the funds originally budgeted for these activities unencumbered funds.

Finally, the SCDH has worked with a consultant to complete an Analysis of Impediments to Fair Housing Act. The AI will be available on April 15, 2019 on the Department of Housing webpage on the Shelby County Government website at the following link: <http://www.shelbycountytexas.gov/1033/Reports-and-Plans>. The Proposed 5-Year Consolidated Plan and Annual Action Plan for July 1, 2019 through June 30, 2020 will be available for public review from April 1, 2019 through April 30, 2019 at the Shelby County Department of Housing, 1075 Mullica Station Road, Memphis, Tennessee 38134 Monday through Friday from 8:00 a.m. to 4:30 p.m. Additionally, these documents will be available at the following library branches in Shelby County: Benjamin Hooks Central Library, Arlington Library, Bartlett Library, Collierville Library, Germantown Library and Millington Library and by accessing this webpage on the Department of Housing webpage on the Shelby County Government website at the following link: <http://www.shelbycountytexas.gov/1033/Reports-and-Plans>.

In order to solicit public comments on the 5-Year Consolidated Plan, Annual Action Plan for FY20 and the Amendment to the current Consolidated Plan, SCDH will hold several public hearings, please see the list below:

1. Monday April 15, 2019 at 5:00pm - Shelby County Code Enforcement, Training Room, 6485 Mullica Station Road Memphis, TN 38134.
2. Wednesday April 17, 2019 at 5:45pm - Collierville Library, Public Meeting Room, 501 Poplar View Place Collierville, TN 38017.
3. Tuesday April 23, 2019 at 5:30pm - Bartlett Library, Main Meeting Room, 5884 Stage Road Bartlett, TN 38134.

For the public hearings on Monday April 15, 2019, the training room can be accessed directly from the parking lot west of the Code Enforcement building. Attendees should park and follow the signage that leads to the training room. If you plan to attend any of these public hearings and have special needs, please contact the Department of Housing at (901) 527-7651 by Wednesday April 10, 2019 and we will work to accommodate you.

For those unable to attend the public hearings, written comments will be accepted through 4:00 p.m. on April 30, 2019. Written comments should be addressed to Ms. Spilley Wright (Spilleywright@shelbycountytexas.gov), Shelby County Department of Housing, 1075 Mullica Station Road, Memphis, TN 38134. SCDH will respond to written comments within five working days of their receipt. For questions concerning the 5-Year Consolidated Plan, Program Year 2019 Proposed Annual Action Plan, Amendments to the current Consolidated Plan, and/or the AI, please contact the Department of Housing at 901-222-7600 or TTY at 901-222-2310.

For more information on Equal Opportunity, please contact the Department of Housing at 901-222-7600.

The Shelby County Department of Housing does not discriminate on the basis of race, color, national origin, sex, religion, age or disability in employment or provision of services. Equal opportunity/equal access provided.

Attest:  
Scott Waldrop, Administrator  
Department of Housing

Lee Harris  
Shelby County Mayor

*Shelby County Dept of Housing*

**PUBLIC NOTICE**  
**SHELBY COUNTY DEPARTMENT OF HOUSING**  
**PROPOSED 5-YEAR CONSOLIDATED PLAN AND**  
**PROPOSED ANNUAL ACTION PLAN FOR FY20**  
**AMENDMENT TO THE CONSOLIDATED PLAN**  
**ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING**

The Shelby County Department of Housing (SCDH) has prepared a draft of the Federal 5-Year Consolidated Plan for Shelby County Fiscal Years 2020-2024 and the Annual Action Plan for Fiscal Year 2020 (July 1, 2019-June 30, 2020). The 5-Year Consolidated Plan addresses the proposed use of funds received from the U.S. Department of Housing and Urban Development during Federal Fiscal Years 2019-2023. The Annual Action Plan for FY2020 (July 1, 2019-June 30, 2020) is required by the U.S. Department of Housing and Urban Development (HUD) for the receipt of Continuously Developing Block Grant (CDBG) and HOME Grant Entitlement funds. The Proposed Annual Action Plan describes activities proposed by SCDH to address housing and community development needs, especially needs in low- to moderate-income areas of Shelby County outside of the City of Memphis.

At this time, SCDH has not yet been notified of CDBG and HOME allocation amounts and is basing this proposed 5-Year Consolidated Plan and Annual Action Plan on an assumption of funding equal to the current Program Year (FY19) as follows: \$1,204,505.00 in CDBG funds, \$10,000.00 in CDBG Program Income, \$406,554.00 in HOME grant funds, \$15,000.00 in HOME program income, and \$91,474.85 in HOME match funds for use during Shelby County's fiscal year 2020. The following table summarizes resources and expenditures in the Proposed Annual Plan for FY20:

Anticipated Resources	CDBG	HOME	Total Funds
Allocation	\$ 1,204,505.00	\$ 406,554.00	\$ 1,611,059.00
Match	\$ -	\$ 91,474.85	\$ 91,474.85
Program income	\$ 10,000.00	\$ 15,000.00	\$ 25,000.00
<b>TOTAL AVAILABLE</b>	<b>\$ 1,214,505.00</b>	<b>\$ 513,028.85</b>	<b>\$ 1,727,533.85</b>

Project Name	CDBG	HOME	TOTAL
Housing Rehab/Minor Home Repair	\$ 508,944.80	\$ 411,390.15	\$ 920,334.95
CDBG Set-aside	\$ -	\$ 60,983.10	\$ 60,983.10
Community Development Projects	\$ 200,000.00	\$ -	\$ 200,000.00
Public Service	\$ 50,000.00	\$ -	\$ 50,000.00
Program Delivery	\$ 212,000.00	\$ -	\$ 212,000.00
Administration and Planning	\$ 242,901.20	\$ 40,655.40	\$ 283,556.60
<b>TOTAL</b>	<b>\$ 1,214,806.00</b>	<b>\$ 513,028.65</b>	<b>\$ 1,727,834.65</b>

If these anticipated resources differ from actual 2019 Program Year allocations, SCDH proposes adjusting funding for each activity either up or down according to the following order of priority: Priority 1: Housing Rehabilitation and Minor Home Repair; Priority 2: Community Development Projects (responsive to high-priority re-housing community development needs); and Priority 3: Public Service Activities. In addition to the 5-Year Consolidated Plan and Annual Action Plan, SCDH also proposes canceling the following projects from the current FY2014-2019 5-Year Consolidated Plan: Mill Street Street Improvements in Collierville for AP2, Downtown Collierville Greenbelt Trail in Collierville for AP3, and Mill Street Street Improvements in Collierville for AP3. These projects do not remain a priority during the current 5-Year Consolidated planning period. SCDH proposes amending the current Consolidated Plan by canceling these projects and making the funds originally budgeted for these activities unallocated funds. Finally, the SCDH has worked with a consultant to complete an Analysis of Impediments to Fair Housing (AI). The AI will be available on April 15, 2019 on the Department of Housing webpage on the Shelby County Government website at the following link: <http://www.shelbycountyt.gov/2163/ItemsandPlans>. The Proposed 5-Year Consolidated Plan and Annual Action Plan for July 1, 2019 through June 30, 2020 will be available for public review from April 1, 2019 through April 30, 2019 at the Shelby County Department of Housing, 1075 Mullins Station Road, Memphis, Tennessee 38134 Monday through Friday from 9:00 a.m. to 4:30 p.m. Additionally, these documents will be available at the following library branches in Shelby County: Benjamin Hooks Central Library, Arlington Library, Bartlett Library, Collierville Library, Germantown Library and Millington Library and by accessing this webpage on the Department of Housing webpage on the Shelby County Government website at the following link: <http://www.shelbycountyt.gov/2103/ItemsandPlans> in order to solicit public comments on the 5-Year Consolidated Plan, Annual Action Plan for FY20 and the Amendment to the current Consolidated Plan. SCDH will hold several public hearings; please see the list below:

- Monday April 22, 2019 at 9:00am Shelby County Code Enforcement, Training Room, 6400 Mullins Station Road Memphis, TN 38134.
- Wednesday April 27, 2019 at 5:45am Collierville Library, Public Meeting Room, 501 Poplar View Hwy Collierville, TN 38011.
- Tuesday April 23, 2019 at 5:30pm Bartlett Library, Main Meeting Room, 5884 Stage Road Bartlett, TN 38134.

For the public hearing on Monday April 22, 2019, the training room can be accessed directly from the parking lot west of the Code Enforcement building. Attendees should park and follow the signage that leads to the training room; if you plan to attend any of these public hearings and have special needs, please contact the Department of Housing at (901) 222-7601 on Wednesday April 10, 2019 and we will work to accommodate you.

For those unable to attend the public hearings, written comments will be accepted through 4:30 p.m. on April 30, 2019. Written comments should be addressed to Ms. Sydney Wright (Sydney.wright@shelbycountyt.gov), Shelby County Department of Housing, 1075 Mullins Station Road, Memphis, TN 38134. SCDH will respond to written comments within five working days of their receipt. For questions concerning the 5-Year Consolidated Plan, Program Year 2019 Proposed Annual Action Plan, Amendment to the current Consolidated Plan, and/or the AI, please contact the Department of Housing at 901-222-7600 or TTY at 901-222-2300.

**For more information or to schedule a public hearing call 901-222-6289**

The Shelby County Department of Housing does not discriminate on the basis of race, color, national origin, sex, religion, age or disability in employment or provision of services. Equal opportunity/equal access provided.

Lee Harris  
Shelby County Mayor

About:  
Scott Walling, Administrator  
Department of Housing  
Mar. 28, 2019      Web98298

**PUBLIC NOTICE  
SHELBY COUNTY DEPARTMENT OF HOUSING  
PROPOSED 5-YEAR CONSOLIDATED PLAN AND  
PROPOSED ANNUAL ACTION PLAN FISCAL YEAR  
2019-2023 AND THE CONSOLIDATED PLAN  
ANALYSIS OF IMPROVEMENTS TO FAIR HOUSING**

The Shelby County Department of Housing (SDOH) has prepared a draft of the proposed 5-Year Consolidated Plan for Shelby County Fiscal Years 2019-2023 and the Annual Action Plan for Fiscal Year 2019 (July 1, 2019 through June 30, 2020). The 5-Year Consolidated Plan addresses the proposed use of funds received from the U.S. Department of Housing and Urban Development during Fiscal Year 2019-2023 and the Annual Action Plan for FY2019 HUD Program Year 2019, as required by the U.S. Department of Housing and Urban Development (HUD) for the receipt of Community Development Block Grant (CDBG) and HOME Grant funding. The proposed Annual Action Plan describes activities proposed by SDOH to address housing and community development needs, especially needs of low- to moderate-income areas of Shelby County outside of the City of Memphis.

As the state, SDOH has not yet been notified of CDBG and HOME allocation amounts and is basing the proposed 5-Year Consolidated Plan and Annual Action Plan on an assumption of funding equal to the current Program Year 197503, or, following HUD's FY2019 CDBG award, \$16,000,000 in CDBG Program income, \$400,000,000 in HOME grant funds, \$10,000,000 in CDBG program income, and \$10,000,000 in HOME grant funds for use during Shelby County's Fiscal Year 2019. The following table summarizes revenues and expenditures in the Proposed Annual Plan for FY20.

Anticipated Revenues	CDBG	HOME	Total Funds
MIXED USE	\$1,324,906.00	\$40,584.00	\$1,365,490.00
MOBILE HOME		\$11,476.00	\$11,476.00
Program Income	\$40,000.00	\$75,000.00	\$115,000.00
<b>TOTAL AVAILABLE</b>	<b>\$1,364,906.00</b>	<b>\$116,060.00</b>	<b>\$1,480,966.00</b>

Project Name	CDBG	HOME	TOTAL
Housing Rehabilitation Home Repair	\$328,444.00	\$407,392.75	\$735,836.75
CDBG Set-aside		\$40,000.00	\$40,000.00
Community Development Projects	\$100,000.00		\$100,000.00
Public Housing	\$100,000.00		\$100,000.00
Program Delivery	\$210,000.00		\$210,000.00
Administration and Planning	\$400,000.00	\$40,000.00	\$440,000.00
<b>TOTAL</b>	<b>\$1,128,444.00</b>	<b>\$487,392.75</b>	<b>\$1,615,836.75</b>

If there are any changes to the 5-Year term 2019 Program Year allocation, SDOH proposes adjusting funding for each activity either up or down according to the following order of priority: Priority 1 - Housing Rehabilitation and Home Repair; Priority 2 - Community Development Projects; Priority 3 - Public Housing; and Priority 4 - Administration.

In addition to the 5-Year Consolidated Plan and Annual Action Plan, SDOH also proposes requesting funding for such activities either up or down according to the following order of priority: Priority 1 - Housing Rehabilitation and Home Repair; Priority 2 - Community Development Projects; Priority 3 - Public Housing; and Priority 4 - Administration.

Finally, the SDOH has worked with a consultant to complete an Analysis of Impediments to Fair Housing (AIFH). The AIFH will be available on April 15, 2019 on the Department of Housing website at the following link: <http://www.shelbycountytexas.gov/2110/impediments>

The Proposed 5-Year Consolidated Plan and Annual Action Plan for July 1, 2019 through June 30, 2020 will be available for public review from April 1, 2019 through April 30, 2019 at the Shelby County Department of Housing, 1003 Madison Station Road, Memphis, Tennessee 38114 Monday through Friday from 8:00 a.m. to 5:00 p.m. Alternatively, basic documents will be available at the following sites: Memphis, Tennessee; Memphis Public Library; Chattanooga Library; Marietta Library; Columbia Library; Chattanooga Library; and Memphis Library and by accessing the website at the Department of Housing website at the Shelby County Government website at the following link: <http://www.shelbycountytexas.gov/2110/impediments>

In order to solicit public comments on the 5-Year Consolidated Plan, Annual Action Plan for FY20 and the Amendment to the Annual Consolidated Plan, SDOH will hold several public hearings, please see the list below.

Outage on the Department of Housing website on the Shelby County Government website at the following link: <http://www.shelbycountytexas.gov/2110/impediments>

In order to solicit public comments on the 5-Year Consolidated Plan, Annual Action Plan for FY20 and the Amendment to the Annual Consolidated Plan, SDOH will hold several public hearings, please see the list below:

1. Monday, April 22, 2019 at 5:00pm, Shelby County Code Enforcement Training Room, 1003 Madison Station Road Memphis, TN 38114
2. Wednesday, April 24, 2019 at 12:00pm, Chattanooga Library, Public Meeting Room, 301 Poplar View Way Chattanooga, TN 38407
3. Thursday, April 25, 2019 at 7:00pm, Marietta Library, Public Meeting Room, 2554 Major Road Marietta, TN 37554

For the public hearing on Monday, April 22, 2019, the hearing room can be accessed directly from the parking lot west of the Code Enforcement building. Attendees should park and follow the signage that leads to the meeting room. If you are on either side of these public hearings and have special needs, please contact the Department of Housing at (901) 323-7481 by Wednesday, April 18, 2019 and we will work to accommodate you.

For those unable to attend the public hearings, written comments will be accepted through 4:00 p.m. on April 25, 2019. Written comments should be submitted to: Mr. Robert Wright (Robert.Wright@shelbycountytexas.gov), Shelby County Department of Housing, 1003 Madison Station Road, Memphis, TN 38114. SDOH will respond to written comments within two working days of their receipt. The deadline regarding the 5-Year Consolidated Plan, Program Year 2019 Proposed Annual Action Plan, Amendment to the Annual Consolidated Plan, and the AIFH, please contact the Department of Housing at (901) 323-7481 or TTY at (901) 323-7276.

Related information on Equal Housing Lending is at [www.fairhousing.org](http://www.fairhousing.org)

The Shelby County Department of Housing does not discriminate on the basis of race, color, national origin, sex, religion, age or disability in employment or provision of services equal opportunity laws, policies and procedures.

Lee Harris  
Shelby County Mayor

Alan  
Alan Harris, Administrator  
Department of Housing

## PUBLIC NOTICE

### SHELBY COUNTY DEPARTMENT OF HOUSING PROPOSED 5-YEAR CONSOLIDATED PLAN AND PROPOSED ANNUAL ACTION PLAN FOR FY20 AMENDMENT TO THE CONSOLIDATED PLAN ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING

The Shelby County Department of Housing (SCDH) has prepared a draft of the Federal 5-Year Consolidated Plan for Shelby County Fiscal Years 2020-2024 and the Annual Action Plan for Fiscal Year 2020 (July 1, 2019-June 30, 2020). The 5-Year Consolidated Plan addresses the proposed use of funds received from the U.S. Department of Housing and Urban Development during Federal Fiscal Years 2019-2024. The Annual Action Plan for FY2020 (HUD Program Year 2019) is required by the U.S. Department of Housing and Urban Development (HUD) for the receipt of Community Development Block Grant (CDBG) and HOME Grant Entitlement funds. The Proposed Annual Action Plan describes activities proposed by SCDH to address housing and community development needs, especially needs in low- to moderate-income areas of Shelby County outside of the City of Memphis.

At this time, SCDH has not yet been notified of CDBG and HOME allocations and is basing this proposed 5-Year Consolidated Plan and Annual Action Plan on an allocation of funding equal to the current Program Year (FY19) as follows: \$1,204,566.00 in CDBG funds, \$10,000.00 in CDBG Program Income, \$604,554.00 in HOME grant funds, \$15,000.00 in HOME program income, and \$91,474.65 in local match funds for use during Shelby County's Fiscal Year 2020. The following table summarizes resources and expenditures in the proposed Annual Plan for FY20.

If these anticipated resources differ from actual 2019 Program Year allocations, SCDH proposes

Anticipated Resources	CDBG	HOME	Total Funds
Allocation	\$ 1,204,566.00	\$ 604,554.00	\$ 1,811,050.00
Match	\$ -	\$ 91,474.65	\$ 91,474.65
Program Income	\$ 10,000.00	\$ 15,000.00	\$ 25,000.00
<b>TOTAL AVAILABLE</b>	<b>\$ 1,214,566.00</b>	<b>\$ 715,028.65</b>	<b>\$ 1,927,594.65</b>

Project Name	CDBG	HOME	TOTAL
Housing Rehab/Minor Home Repair	\$ 508,944.50	\$ 413,350.15	\$ 922,294.65
CHDO Set aside	-	\$ 60,989.10	\$ 60,989.10
Community Development Projects	\$ 100,000.00	\$ -	\$ 200,000.00
Public Service	\$ 50,000.00	\$ -	\$ 50,000.00
Program Delivery	\$ 212,660.00	\$ -	\$ 212,660.00
Administration and Planning	\$ 242,961.50	\$ 40,655.40	\$ 283,596.40
<b>TOTAL</b>	<b>\$ 1,214,566.00</b>	<b>\$ 515,028.65</b>	<b>\$ 1,727,594.65</b>

adjusting funding for each activity either up or down according to the following order of priority: Priority 1 - Housing Rehabilitation and Minor Home Repair; Priority 2 - Community Development Projects responsive to high-priority non-housing community development needs; and Priority 3 - Public Service Activities.

In addition to the 5-Year Consolidated Plan and Annual Action Plan, SCDH also proposes cancelling the following projects from the current FY2016-2019 5-Year Consolidated Plan: Mill Street Office Improvements in Collierville for AP2, Downtown Collierville Greenbelt Trail in Collierville for AP2, and Hill Street Culture Improvements in Collierville for AP2. These projects did not remain a priority during the current 5-Year Consolidated planning period. SCDH proposes amending the current Consolidated Plan by cancelling these projects and making the funds originally budgeted for these activities available for other uses.

Finally, the SCDH has worked with a consultant to complete an Analysis of Impediments to Fair Housing (AI). The AI will be available on April 15, 2019 on the Department of Housing webpage on the Shelby County Government website at the following link: <http://www.shelbycountym.gov/5105/Reports-and-Plans>

The Proposed 5-Year Consolidated Plan and Annual Action Plan for July 1, 2019 through June 30, 2020 will be available for public review from April 5, 2019 through April 30, 2019 at the Shelby County Department of Housing, 1075 Mullins Station Road, Memphis, Tennessee 38114 Monday through Friday from 8:00 a.m. to 4:30 p.m. Additionally, these documents will be available at the following library branches in Shelby County: Benjamin Franklin Central Library, Arlington Library, Riverside Library, Collierville Library, Germantown Library, and Millington Library and by accessing this webpage on the Department of Housing webpage on the Shelby County Government website at the following link: <http://www.shelbycountym.gov/5103/Reports-and-Plans>

In order to solicit public comments on the 5-Year Consolidated Plan, Annual Action Plan for FY20 and the Amendment to the current Consolidated Plan, SCDH will hold several public hearings, please see the list below:

1. Monday, April 15, 2019 at 5:00pm - Shelby County Code Enforcement, Training Room, 6445 Mullins Station Road, Memphis, TN 38134
2. Wednesday, April 17, 2019 at 5:45pm - Collierville Library, Hall Meeting Room, 501 Poplar View, Flowery Branch, TN 38017
3. Tuesday, April 23, 2019 at 5:30pm - Bartlett Library, Main Meeting Room, 5884 Stage Road, Bartlett, TN 38034

For the public hearing on Monday, April 15, 2019, the training room can be accessed directly from the parking lot west of the Code Enforcement building. Attendees should park and follow the signage that leads to the training room. If you plan to attend any of these public hearings and have special needs, please contact the Department of Housing at (901) 222-7600 by Wednesday, April 10, 2019 and we will work to accommodate you.

For those unable to attend the public hearings, written comments will be accepted through 4:30 p.m. on April 30, 2019. Written comments should be addressed to Ms. Sydney Wright (Sydneywright@shelbycountym.gov), Shelby County Department of Housing, 1075 Mullins Station Road, Memphis, TN 38114. SCDH will respond to written comments within five working days of their receipt. For questions concerning the 5-Year Consolidated Plan, Program Year 2019 Proposed Annual Action Plan, Amendment to the current Consolidated Plan, and/or the AI, please contact the Department of Housing at 901-222-7600 or TTY at 901-222-4280.

Para más información en Español, por favor llame al 901-222-4280.

The Shelby County Department of Housing does not discriminate on the basis of race, color, national origin, sex, religion, age or disability in employment or provision of services. Equal opportunity/equal access provided.

Lae Harris  
Shelby County Mayor

Attest:  
Scott Wolking, Administrator  
Department of Housing

# PUBLIC NOTICE

## SHELBY COUNTY DEPARTMENT OF HOUSING PROPOSED 5-YEAR CONSOLIDATED PLAN AND PROPOSED ANNUAL ACTION PLAN FOR FY20 AMENDMENT TO THE CONSOLIDATED PLAN ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING

The Shelby County Department of Housing (SCDH) has prepared a draft of the Federal 5-Year Consolidated Plan for Shelby County Fiscal Years 2019-2024 and the Annual Action Plan for Fiscal Year 2020 (July 1, 2019-June 30, 2020). The 5-Year Consolidated Plan addresses the proposed use of funds received from the U.S. Department of Housing and Urban Development during Federal Fiscal Years 2019-2023. The Annual Action Plan for FY2020 (HUD Program Year 2019) is required by the U. S. Department of Housing and Urban Development (HUD) for the receipt of Community Development Block Grant (CDBG) and HOME Grant Entitlement funds. The Proposed Annual Action Plan describes activities proposed by SCDH to address housing and community development needs, especially needs in low- to moderate- income areas of Shelby County outside of the City of Memphis.

At this time, SCDH has not yet been notified of CDBG and HOME allocation amounts and is basing this proposed 5-Year Consolidated Plan and Annual Action Plan on an assumption of funding equal to the current Program Year (PY18) as follows: \$1,204,596.00 in CDBG funds, \$10,000.00 in CDBG Program income, \$496,554.00 in HOME grant funds, \$15,000.00 in HOME program income, and \$91,474.65 in local match funds for use during Shelby County's Fiscal Year 2020. The following table summarizes resources and expenditures in the Proposed Annual Plan for FY20:

Anticipated Resources	CDBG	HOME	Total Funds
Allocation	\$ 1,204,596.00	\$ 496,554.00	\$ 1,631,090.00
Match	\$ -	\$ 91,474.65	\$ 91,474.65
Program Income	\$ 10,000.00	\$ 15,000.00	\$ 25,000.00
<b>TOTAL AVAILABLE</b>	<b>\$ 1,214,596.00</b>	<b>\$ 523,028.65</b>	<b>\$ 1,727,534.65</b>

Project Name	CDBG	HOME	TOTAL
Housing Rehabilitation/Minor Home Repair	\$ 508,944.80	\$ 411,350.15	\$ 920,334.95
CH2D Set-aside	-	\$ 40,983.10	\$ 40,983.10
Community Development Projects	\$ 200,000.00	\$ -	\$ 200,000.00
Public Service	\$ 50,000.00	\$ -	\$ 50,000.00
Program Delivery	\$ 212,660.00	\$ -	\$ 212,660.00
Administration and Planning	\$ 242,991.20	\$ 40,605.40	\$ 283,596.60
<b>TOTAL</b>	<b>\$ 1,214,596.00</b>	<b>\$ 523,028.65</b>	<b>\$ 1,727,534.65</b>

If these anticipated resources differ from actual 2019 Program Year allocations, SCDH proposes adjusting funding for each activity either up or down according to the following order of priority: Priority 1- Housing Rehabilitation and Minor Home Repair; Priority 2 - Community Development Projects responsive to high priority non-housing community development needs; and Priority 3- Public Service Activities.

In addition to the 5-Year Consolidated Plan and Annual Action Plan, SCDH also proposes cancelling the following projects from the current FY2014-2019 5-Year Consolidated Plan: Mill Street Outfall Improvements in Collierville for AP1, Downtown Collierville Greenbelt Trail in Collierville for AP3, and Mill Street Culvert Improvements in Collierville for AP3. These projects did not remain a priority during the current 5-Year Consolidated planning period. SCDH proposes amending the current Consolidated Plan by cancelling these projects and making the funds originally budgeted for these activities unallocated funds.

Finally, the SCDH has worked with a consultant to complete an Analysis of Impediments to Fair Housing (AI). The AI will be available on April 15, 2019 on the Department of Housing webpage on the Shelby County Government website at the following link: <http://www.shelbycountyttn.gov/2103/Reports-and-Plans>

The Proposed 5-Year Consolidated Plan and Annual Action Plan for July 1, 2019 through June 30, 2020 will be available for public review from April 1, 2019 through April 30, 2019 at the Shelby County Department of Housing, 1075 Mullins Station Road, Memphis, Tennessee 38134 Monday through Friday from 8:00 a.m. to 4:30 p.m. Additionally, these documents will be available at the following library branches in Shelby County: Benjamin Hooks Central Library, Arlington Library, Bartlett Library, Collierville Library, Germantown Library and Millington Library and by accessing this webpage on the Department of Housing webpage on the Shelby County Government website at the following link: <http://www.shelbycountyttn.gov/2103/Reports-and-Plans>

In order to solicit public comments on the 5-Year Consolidated Plan, Annual Action Plan for FY20 and the Amendment to the current Consolidated Plan, SCDH will hold several public hearings; please see the list below:

1. Monday April 15, 2019 at 5:00pm- Shelby County Code Enforcement, Training Room, 6465 Mullins Station Road Memphis, TN 38134.
2. Wednesday April 17, 2019 at 5:45pm- Collierville Library, Hall Meeting Room, 501 Poplar View Pkwy/Collierville, TN 38017.
3. Tuesday April 23, 2019 at 5:30pm- Bartlett Library, Main Meeting Room, 5844 Stage Road Bartlett, TN 38134.

For the public hearing on Monday April 15, 2019, the training room can be accessed directly from the parking lot west of the Code Enforcement building. Attendees should park and follow the signage that leads to the training room. If you plan to attend any of these public hearings and have special needs, please contact the Department of Housing at (901) 222-7600 by Wednesday April 10, 2019 and we will work to accommodate you.

For those unable to attend the public hearings, written comments will be accepted through 4:30 p.m. on April 30, 2019. Written comments should be addressed to Ms. Sydney Wright (Sydney.wright@shelbycountyttn.gov), Shelby County Department of Housing, 1075 Mullins Station Road, Memphis, TN 38134. SCDH will respond to written comments within five working days of their receipt. For questions concerning the 5-Year Consolidated Plan, Program Year 2019 Proposed Annual Action Plan, Amendment to the current Consolidated Plan, and/or the AI, please contact the Department of Housing at 901-222-7600 or TTY at 901-222-2500.

Para más información en Español, por favor llame al 901-222-4285.

The Shelby County Department of Housing does not discriminate on the basis of race, color, national origin, sex, religion, age or disability in employment or provision of services. Equal opportunity/equal access provider.

Lee Harris  
Shelby County Mayor

Arant  
Scott Walkup, Administrator  
Department of Housing

ARTS & ENTERTAINMENT memphisover.com 35

CLASSIFIEDS

NOTICE OF PROPOSED SALE OF REAL PROPERTY BY SHELBY COUNTY GOVERNMENT

Notice is hereby given, pursuant to T.C.A. §67-5-2507, that Shelby County Government has received an Offer to Purchase for the following property:

Name of Purchaser: Tax Parcel #: Tax Parcel ID No. Tax Sale #: Tax Sale No. Price Offered: \$Price Offered Terms: Cash

Additional Offer to Purchase, of at least ten percent (10%) higher, may be submitted within Ten (10) working days of this notice. If additional offers are received during this ten (10) day period, all prospective Purchasers must attend a Public "Bid Off" or Bid Off Time on the Bid Off Date, to be held in the Shelby County Land Bank Office, to determine the highest and best offer. The property shall thereafter be sold to the prospective Purchaser making the highest and best offer without warranties of any sort.

SHELBY COUNTY LAND BANK 544 ADAMS AVENUE MEMPHIS, TN 38103 MIKE BLACKWELL (901) 222-2681

NOTICE OF PROPOSED SALE OF REAL PROPERTY BY SHELBY COUNTY GOVERNMENT

Notice is hereby given, pursuant to T.C.A. §67-5-2507, that Shelby County Government has received an Offer to Purchase for the following property:

Name of Purchaser: Tax Parcel #: Tax Parcel ID No. Tax Sale #: Tax Sale No. Price Offered: \$Price Offered Terms: Cash

Additional Offer to Purchase, of at least ten percent (10%) higher, may be submitted within Ten (10) working days of this notice. If additional offers are received during this ten (10) day period, all prospective Purchasers must attend a Public "Bid Off" or Bid Off Time on the Bid Off Date, to be held in the Shelby County Land Bank Office, to determine the highest and best offer. The property shall thereafter be sold to the prospective Purchaser making the highest and best offer without warranties of any sort.

SHELBY COUNTY LAND BANK 544 ADAMS AVENUE MEMPHIS, TN 38103 MIKE BLACKWELL (901) 222-2681

NOTICE OF PROPOSED SALE OF REAL PROPERTY BY SHELBY COUNTY GOVERNMENT

Notice is hereby given, pursuant to T.C.A. §67-5-2507, that Shelby County Government has received an Offer to Purchase for the following property:

Name of Purchaser: Tax Parcel #: Tax Parcel ID No. Tax Sale #: Tax Sale No. Price Offered: \$Price Offered Terms: Cash

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PUBLIC NOTICE SHELBY COUNTY DEPARTMENT OF HOUSING PROPOSED 5-YEAR CONSOLIDATED PLAN AND PROPOSED ANNUAL ACTION PLAN FOR FY20 AMENDMENT TO THE CONSOLIDATED PLAN ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING

The Shelby County Department of Housing (SCDH) has prepared a draft of the Federal 5-Year Consolidated Plan for Shelby County Fiscal Years 2020-2024 and the Annual Action Plan for Fiscal Year 2020 (July 1, 2019-June 30, 2020). The 5-Year Consolidated Plan addresses the proposed use of funds received from the U.S. Department of Housing and Urban Development during Federal Fiscal Years 2018-2023. The Annual Action Plan for FY2000 HUD Program Year 2019, is required by the U.S. Department of Housing and Urban Development (HUD) for the receipt of Community Development Block Grant (CDBG) and HOME Grant Supplemental funds. The Proposed Annual Action Plan describes activities proposed by SCDH to address housing and community development needs, especially needs in low- to moderate-income areas of Shelby County outside of the City of Memphis.

At this time, SCDH has not yet been notified of CDBG and HOME allocation amounts and is basing this proposed 5-Year Consolidated Plan and Annual Action Plan on an assumption of funding equal to the current Program Year (FY19) as follows: \$1,204,506.00 in CDBG funds; \$10,000.00 in CDBG Program Income; \$406,554.30 in HOME grant funds; \$15,000.00 in HOME program income, and \$81,474.65 in local match funds for use during Shelby County's Fiscal Year 2020. The following table summarizes resources and expenditures in the Proposed Annual Plan for FY20.

Table with 4 columns: Anticipated Resource, CDBG, HOME, Total Funds. Rows include Allocation, Match, Program Income, and TOTAL AVAILABLE.

Table with 4 columns: Project Name, CDBG, HOME, TOTAL. Rows include Housing Rehabilitation, Community Development, Public Service, Administration and Planning, and TOTAL.

If these anticipated resources differ from actual 2019 Program Year allocations, SCDH proposes adjusting funding for each activity either up or down according to the following order of priority: Priority 1- Housing Rehabilitation and Minor Home Repairs; Priority 2- Community Development Projects responsive to high priority non-housing community development needs; and Priority 3- Public Service Activities.

In addition to the 5-Year Consolidated Plan and Annual Action Plan, SCDH also proposes canceling the following projects from the current FY2014-2019 5-Year Consolidated Plan: Mill Street Corridor Improvements in Collierville for AP2, Downtown Collierville Greenbelt Trail in Collierville for AP3, and Mill Street Corridor Improvements in Collierville for AP3. These projects did not remain a priority during the current 5-Year Consolidated planning period. SCDH proposes amending the current Consolidated Plan by canceling these projects and moving the funds originally budgeted for these activities unallocated funds.

Finally, the SCDH has worked with a consultant to complete an Analysis of Impediments to Fair Housing (AI). The AI will be available on April 15, 2019 on the Department of Housing webpage on the Shelby County Government website at the following link: http://www.shelbycountytg.gov/103/Reports-and-Plans

The Proposed 5-Year Consolidated Plan and Annual Action Plan for July 1, 2019 through June 30, 2020 will be available for public review from April 1, 2019 through April 30, 2019 at the Shelby County Department of Housing, 1075 Mullins Station Road, Memphis, Tennessee 38134 Monday through Friday from 8:00 a.m. to 4:30 p.m. Additionally, these documents will be available at the following library branches in Shelby County: Benjamin Hooks Central Library, Arlington Library, Bartlett Library, Collierville Library, Germantown Library and Millington Library and by accessing this webpage on the Department of Housing webpage on the Shelby County Government website at the following link: http://www.shelbycountytg.gov/103/Reports-and-Plans

In order to solicit public comments on the 5-Year Consolidated Plan, Annual Action Plan for FY20 and the Amendment to the current Consolidated Plan, SCDH will hold several public hearings; please see the list below:

- 1. Monday, April 15, 2019 at 2:00pm- Shelby County Code Enforcement, Training Room, 5445 Mullins Station Road Memphis, TN 38134.
2. Wednesday, April 17, 2019 at 5:45pm- Collierville Library, Main Meeting Room, 551 Poplar View Pkwy Collierville, TN 38017.
3. Tuesday, April 23, 2019 at 5:30pm- Bartlett Library, Main Meeting Room, 3044 Stage Road Bartlett, TN 38134.

For the public hearing on Monday April 15, 2019, the training room can be accessed directly from the parking lot west of the Code Enforcement building. Attendees should park and follow the signage that leads to the training room. If you plan to attend any of these public hearings and have special needs, please contact the Department of Housing at (901) 222-7601 by Wednesday April 10, 2019 and we will work to accommodate you.

For those unable to attend the public hearings, written comments will be accepted through 4:00 p.m. on April 30, 2019. Written comments should be addressed to Ms. Sydney Wright (Sydney.wright@shelby-county.gov), Shelby County Department of Housing, 1075 Mullins Station Road, Memphis, TN 38134. SCDH will respond to written comments within five working days of their receipt. For questions concerning the 5-Year Consolidated Plan, Program Year 2019 Proposed Annual Action Plan, Amendment to the current Consolidated Plan, and/or the AI, please contact the Department of Housing at 901-222-7600 or TTY at 901-222-2390.

For more information on this plan, see favor items at 901-222-4289.

The Shelby County Department of Housing does not discriminate on the basis of race, color, national origin, sex, religion, age or disability in employment or provision of services. Equal opportunity/affirmative action policies.

Lee Harris, Shelby County Mayor



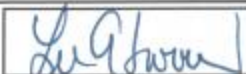
**Grantee SF-424's and Certification(s)**

OMB Number: 4040-0004  
Expiration Date: 12/31/2019

Application for Federal Assistance SF-424		
* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revision, select appropriate letter(s): <input type="text"/> * Other (Specify): <input type="text"/>
* 3. Date Received: <input type="text"/>	4. Applicant Identifier: <input type="text"/>	
5a. Federal Entity Identifier: <input type="text"/>	5b. Federal Award Identifier: <input type="text"/>	
State Use Only:		
6. Date Received by State: <input type="text"/>	7. State Application Identifier: <input type="text"/>	
<b>8. APPLICANT INFORMATION:</b>		
* a. Legal Name: <input type="text" value="Shelby County Government"/>		
* b. Employer/Taxpayer Identification Number (EIN/TIN): <input type="text" value="62-000841"/>	* c. Organizational DUNS: <input type="text" value="0411748890000"/>	
d. Address:		
* Street1: <input type="text" value="Shelby County Department of Housing"/>	Street2: <input type="text" value="1075 Mullins Station Road"/>	
* City: <input type="text" value="Memphis"/>	County/Parish: <input type="text" value="Shelby"/>	
* State: <input type="text" value="TN: Tennessee"/>	Province: <input type="text"/>	
* Country: <input type="text" value="USA: UNITED STATES"/>	* Zip / Postal Code: <input type="text" value="38134"/>	
e. Organizational Unit:		
Department Name: <input type="text" value="Housing"/>	Division Name: <input type="text" value="Planning &amp; Development"/>	
f. Name and contact information of person to be contacted on matters involving this application:		
Prefix: <input type="text" value="Mr."/>	* First Name: <input type="text" value="Scott"/>	
Middle Name: <input type="text"/>	* Last Name: <input type="text" value="Walkup"/>	
Suffix: <input type="text"/>	Title: <input type="text" value="Administrator"/>	
Organizational Affiliation: <input type="text"/>		
* Telephone Number: <input type="text" value="901-222-7610"/>	Fax Number: <input type="text" value="901-222-7621"/>	
* Email: <input type="text" value="scott.walkup@shelbycountyttn.gov"/>		




Application for Federal Assistance SF-424	
<p><b>* 9. Type of Applicant 1: Select Applicant Type:</b></p> <input type="text" value="B: County Government"/> <p>Type of Applicant 2: Select Applicant Type:</p> <input type="text"/> <p>Type of Applicant 3: Select Applicant Type:</p> <input type="text"/> <p>* Other (specify):</p> <input type="text"/>	
<p><b>* 10. Name of Federal Agency:</b></p> <input type="text" value="Department of Housing &amp; Urban Development"/>	
<p><b>11. Catalog of Federal Domestic Assistance Number:</b></p> <input type="text" value="14.218"/> <p>CFDA Title:</p> <input type="text" value="Community Development Block Grants/Entitlement Grants"/>	
<p><b>* 12. Funding Opportunity Number:</b></p> <input type="text"/> <p>* Title:</p> <input type="text" value="Community Development Block Grants/Entitlement Grants"/>	
<p><b>13. Competition Identification Number:</b></p> <input type="text" value="N/A"/> <p>Title:</p> <input type="text"/>	
<p><b>14. Areas Affected by Project (Cities, Counties, States, etc.):</b></p> <input type="text" value="Shelby County, Tennessee.jpg"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
<p><b>* 15. Descriptive Title of Applicant's Project:</b></p> <input type="text" value="Program Year 2019 CDBG Program"/>	
<p>Attach supporting documents as specified in agency instructions.</p> <input type="button" value="Add Attachments"/> <input type="button" value="Delete Attachments"/> <input type="button" value="View Attachments"/>	

Application for Federal Assistance SF-424	
16. Congressional Districts Of:	
* a. Applicant	8 & 9
* b. Program/Project	8 & 9
Attach an additional list of Program/Project Congressional Districts if needed.	
<input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
17. Proposed Project:	
* a. Start Date:	07/01/2019
* b. End Date:	06/30/2020
18. Estimated Funding (\$):	
* a. Federal	1,189,423.00
* b. Applicant	
* c. State	
* d. Local	
* e. Other	
* f. Program Income	10,000.00
* g. TOTAL	1,199,423.00
* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?	
<input type="checkbox"/> a. This application was made available to the State under the Executive Order 12372 Process for review on <input type="text"/>	
<input type="checkbox"/> b. Program is subject to E.O. 12372 but has not been selected by the State for review.	
<input checked="" type="checkbox"/> c. Program is not covered by E.O. 12372.	
* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If "Yes", provide explanation and attach	
<input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)	
<input checked="" type="checkbox"/> ** I AGREE	
<small>** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.</small>	
Authorized Representative:	
Prefix:	
* First Name:	Lee
Middle Name:	
* Last Name:	Harris
Suffix:	
* Title:	Mayor of Shelby County, Tennessee
* Telephone Number:	901-222-2000
Fax Number:	901-222-2005
* Email:	officeOfTheMayor@shelbycountyttn.gov
* Signature of Authorized Representative:	
* Date Signed:	05/07/2019

Application for Federal Assistance SF-424		
* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revision, select appropriate letter(s): <input type="text"/> * Other (Specify): <input type="text"/>
* 3. Date Received: <input type="text"/>	4. Applicant Identifier: <input type="text"/>	
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State Use Only:		
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* b. Employer/Taxpayer Identification Number (EIN/TIN): <input type="text" value="62-000841"/>	* c. Organizational DUNS: <input type="text" value="0411748890000"/>	
d. Address:		
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* State: <input type="text" value="TN: Tennessee"/>	Province: <input type="text"/>	
* Country: <input type="text" value="USA: UNITED STATES"/>	* Zip / Postal Code: <input type="text" value="38134"/>	
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Middle Name: <input type="text"/>	* Last Name: <input type="text" value="Walkup"/>	
Suffix: <input type="text"/>	Title: <input type="text" value="Administrator"/>	
Organizational Affiliation: <input type="text"/>		
* Telephone Number: <input type="text" value="901-222-7610"/>	Fax Number: <input type="text" value="901-222-7621"/>	
* Email: <input type="text" value="scott.walkup@shelbycountyttn.gov"/>		

Application for Federal Assistance SF-424	
<p><b>* 9. Type of Applicant 1: Select Applicant Type:</b></p> <input type="text" value="B: County Government"/> <p>Type of Applicant 2: Select Applicant Type:</p> <input type="text"/> <p>Type of Applicant 3: Select Applicant Type:</p> <input type="text"/> <p>* Other (specify):</p> <input type="text"/>	
<p><b>* 10. Name of Federal Agency:</b></p> <input type="text" value="Department of Housing &amp; Urban Development"/>	
<p><b>11. Catalog of Federal Domestic Assistance Number:</b></p> <input type="text" value="14.239"/> <p>CFDA Title:</p> <input type="text" value="HOME Investment Partnerships Program"/>	
<p><b>* 12. Funding Opportunity Number:</b></p> <input type="text"/> <p>* Title:</p> <input type="text" value="HOME Investment Partnerships Program"/>	
<p><b>13. Competition Identification Number:</b></p> <input type="text" value="N/A"/> <p>Title:</p> <input type="text"/>	
<p><b>14. Areas Affected by Project (Cities, Counties, States, etc.):</b></p> <input type="text" value="Shelby County, Tennessee.jpg"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
<p><b>* 15. Descriptive Title of Applicant's Project:</b></p> <input type="text" value="Program Year 2019 HOME Grant Program"/>	
<p>Attach supporting documents as specified in agency instructions.</p> <input type="button" value="Add Attachments"/> <input type="button" value="Delete Attachments"/> <input type="button" value="View Attachments"/>	

Application for Federal Assistance SF-424	
<b>16. Congressional Districts Of:</b>	
* a. Applicant	8 6 9
* b. Program/Project	8 6 9
Attach an additional list of Program/Project Congressional Districts if needed.	
<input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
<b>17. Proposed Project:</b>	
* a. Start Date:	07/01/2019
* b. End Date:	06/30/2020
<b>18. Estimated Funding (\$):</b>	
* a. Federal	377,362.00
* b. Applicant	
* c. State	
* d. Local	84,906.45
* e. Other	
* f. Program Income	15,000.00
* g. TOTAL	477,268.45
* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?	
<input type="checkbox"/> a. This application was made available to the State under the Executive Order 12372 Process for review on <input type="text"/> .	
<input type="checkbox"/> b. Program is subject to E.O. 12372 but has not been selected by the State for review.	
<input checked="" type="checkbox"/> c. Program is not covered by E.O. 12372.	
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<input checked="" type="checkbox"/> ** I AGREE	
** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.	
<b>Authorized Representative:</b>	
Prefix:	
* First Name:	Lee
Middle Name:	
* Last Name:	Harris
Suffix:	
* Title:	Mayor of Shelby County, Tennessee
* Telephone Number:	901-222-2000
Fax Number:	901-222-2005
* Email:	OfficeOfTheMayor@shelbycountyttn.gov
* Signature of Authorized Representative:	
* Date Signed:	05/07/2019

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009  
 Expiration Date: 02/28/2022

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:


1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

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Standard Form 424D (Rev. 7-97)  
 Prescribed by OMB Circular A-102

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	Mayor of Shelby County, Tennessee
APPLICANT ORGANIZATION	DATE SUBMITTED
Shelby County Government	05/07/2019

SF-424D (Rev. 7-97) Back

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009  
Expiration Date: 02/28/2022

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
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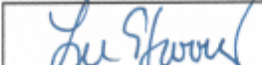
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Standard Form 424D (Rev. 7-97)  
Prescribed by OMB Circular A-102



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13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE Mayor of Shelby County, Tennessee
APPLICANT ORGANIZATION Shelby County Government	DATE SUBMITTED 05/07/2019

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**CERTIFICATIONS**

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

**Affirmatively Further Fair Housing** --The jurisdiction will affirmatively further fair housing.

**Uniform Relocation Act and Anti-displacement and Relocation Plan** -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42 in connection with any activity assisted with funding under the Community Development Block Grant or HOME programs.

**Anti-Lobbying** --To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-L.L.L., "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

**Authority of Jurisdiction** --The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

**Consistency with plan** --The housing activities to be undertaken with Community Development Block Grant, HOME, Emergency Solutions Grant, and Housing Opportunities for Persons With AIDS funds are consistent with the strategic plan in the jurisdiction's consolidated plan.

**Section 3** -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 135.

  
\_\_\_\_\_  
Signature of Authorized Official

5/7/2019  
Date

Mayor of Shelby County, Tennessee  
Title

### Specific Community Development Block Grant Certifications

The Entitlement Community certifies that:

**Citizen Participation** -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

**Community Development Plan** -- Its consolidated plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that have been developed in accordance with the primary objective of the CDBG program (i.e., the development of viable urban communities, by providing decent housing and expanding economic opportunities, primarily for persons of low and moderate income) and requirements of 24 CFR Parts 91 and 570.

**Following a Plan** -- It is following a current consolidated plan that has been approved by HUD.

**Use of Funds** -- It has complied with the following criteria:

1. Maximum Feasible Priority. With respect to activities expected to be assisted with CDBG funds, it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low- and moderate-income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include CDBG-assisted activities which the grantee certifies are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available (see Optional CDBG Certification).

2. Overall Benefit. The aggregate use of CDBG funds, including Section 108 guaranteed loans, during program year(s) 2019 and 2020 [a period specified by the grantee of one, two, or three specific consecutive program years], shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period.

3. Special Assessments. It will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108 loan guaranteed funds, by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

In addition, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

**Excessive Force** -- It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and

2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction.

**Compliance with Anti-discrimination laws** -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 3601-3619) and implementing regulations.

**Lead-Based Paint** -- Its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, Subparts A, B, J, K and R.

**Compliance with Laws** -- It will comply with applicable laws.



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Signature of Authorized Official

5/7/2019  
Date

Mayor of Shelby County, Tennessee  
Title

**OPTIONAL Community Development Block Grant Certification**

Submit the following certification only when one or more of the activities in the action plan are designed to meet other community development needs having particular urgency as specified in 24 CFR 570.208(c):

The grantee hereby certifies that the Annual Plan includes one or more specifically identified CDBG-assisted activities which are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community and other financial resources are not available to meet such needs.

NOT APPLICABLE  
Signature of Authorized Official

\_\_\_\_\_  
Date

\_\_\_\_\_  
Title

**Specific HOME Certifications**

The HOME participating jurisdiction certifies that:

**Tenant Based Rental Assistance** -- If it plans to provide tenant-based rental assistance, the tenant-based rental assistance is an essential element of its consolidated plan.

**Eligible Activities and Costs** -- It is using and will use HOME funds for eligible activities and costs, as described in 24 CFR §§92.205 through 92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in §92.214.

**Subsidy layering** -- Before committing any funds to a project, it will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing;

  
\_\_\_\_\_  
Signature of Authorized Official

5/7/2019  
Date

Mayor of Shelby County, Tennessee  
Title

## Emergency Solutions Grants Certifications

The Emergency Solutions Grants Program recipient certifies that:

**Major rehabilitation/conversion/renovation** – If an emergency shelter’s rehabilitation costs exceed 75 percent of the value of the building before rehabilitation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed rehabilitation.

If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed conversion.

In all other cases where ESG funds are used for renovation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 3 years after the date the building is first occupied by a homeless individual or family after the completed renovation.

**Essential Services and Operating Costs** – In the case of assistance involving shelter operations or essential services related to street outreach or emergency shelter, the recipient will provide services or shelter to homeless individuals and families for the period during which the ESG assistance is provided, without regard to a particular site or structure, so long the recipient serves the same type of persons (e.g., families with children, unaccompanied youth, disabled individuals, or victims of domestic violence) or persons in the same geographic area.

**Renovation** – Any renovation carried out with ESG assistance shall be sufficient to ensure that the building involved is safe and sanitary.

**Supportive Services** – The recipient will assist homeless individuals in obtaining permanent housing, appropriate supportive services (including medical and mental health treatment, victim services, counseling, supervision, and other services essential for achieving independent living), and other Federal, State, local, and private assistance available for these individuals.

**Matching Funds** – The recipient will obtain matching amounts required under 24 CFR 576.201.

**Confidentiality** – The recipient has established and is implementing procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under the ESG program, including protection against the release of the address or location of any family violence shelter project, except with the written authorization of the person responsible for the operation of that shelter.

**Homeless Persons Involvement** – To the maximum extent practicable, the recipient will involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted under the ESG program, in providing services assisted under the ESG program, and in providing services for occupants of facilities assisted under the program.

**Consolidated Plan** – All activities the recipient undertakes with assistance under ESG are consistent with its consolidated plan.

**Discharge Policy** – The recipient will establish and implement, to the maximum extent practicable and where appropriate, policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, mental health facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent this discharge from immediately resulting in homelessness for these persons.

NOT APPLICABLE  
Signature of Authorized Official

\_\_\_\_\_  
Date

\_\_\_\_\_  
Title



**Housing Opportunities for Persons With AIDS Certifications**

The HOPWA grantee certifies that:

**Activities** -- Activities funded under the program will meet urgent needs that are not being met by available public and private sources.

**Building** -- Any building or structure assisted under that program shall be operated for the purpose specified in the consolidated plan:

1. For a period of not less than 10 years in the case of assistance involving new construction, substantial rehabilitation, or acquisition of a facility,
2. For a period of not less than 3 years in the case of assistance involving non-substantial rehabilitation or repair of a building or structure.

NOT APPLICABLE  
Signature of Authorized Official

\_\_\_\_\_  
Date

\_\_\_\_\_  
Title

**APPENDIX TO CERTIFICATIONS**

**INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:**

**Lobbying Certification**

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

## Appendix - Alternate/Local Data Sources

1	<p><b>Data Source Name</b></p> <p>THDA Median Housing Sales Price (2011)</p>
	<p><b>List the name of the organization or individual who originated the data set.</b></p> <p>Tennessee Housing Development Agency</p>
	<p><b>Provide a brief summary of the data set.</b></p> <p>Median and average sales prices of new and existing homes are compiled by THDA from actual and up-to-date information pertaining to residential, single-family home sales in Tennessee counties for calendar year 2011.</p>
	<p><b>What was the purpose for developing this data set?</b></p> <p>These data, collected locally, become part of a comprehensive database maintained by the Division of Property Assessment (Comptroller's Office, State of Tennessee), and give THDA the opportunity to validate the sales price data in comparison to assessed values of both property and improvement. In addition, information in the database enables THDA to restrict their analysis to actual arm's length transactions.</p>
	<p><b>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</b></p> <p>Data is collected for all counties in Tennessee.</p>
	<p><b>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</b></p> <p>Calendar year 2011</p>
	<p><b>What is the status of the data set (complete, in progress, or planned)?</b></p> <p>Complete</p>
2	<p><b>Data Source Name</b></p> <p>2006-2010, 2012-2016 ACS 5-Year Estimates</p>
	<p><b>List the name of the organization or individual who originated the data set.</b></p> <p>The United States Census Bureau</p>
	<p><b>Provide a brief summary of the data set.</b></p> <p>Data on urban Shelby County is not collected by any reporting agency, and thus must be extrapolated from total Shelby County and City of Memphis data. In cases of real numbers such as population and households, the urban county data is taken by subtracting City of Memphis from overall Shelby County data.</p>

	<p><b>What was the purpose for developing this data set?</b></p> <p>The American Community Survey (ACS) helps local officials, community leaders, and businesses understand the changes taking place in their communities. It is the premier source for detailed population and housing information about our nation.</p> <p><b>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</b></p> <p>Data on urban Shelby County is not collected by any reporting agency, and thus must be extrapolated from total Shelby County and City of Memphis data. In cases of real numbers such as population and households, the urban county data is taken by subtracting City of Memphis from overall Shelby County data.</p> <p><b>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</b></p> <p>2006-2010, 2012-2016</p> <p><b>What is the status of the data set (complete, in progress, or planned)?</b></p> <p>Complete</p>
3	<p><b>Data Source Name</b></p> <p>2011-2015 CHAS</p> <p><b>List the name of the organization or individual who originated the data set.</b></p> <p>U.S. Census Bureau</p> <p><b>Provide a brief summary of the data set.</b></p> <p>Custom tabulations of American Community Survey (ACS) data from the U.S. Census Bureau</p> <p><b>What was the purpose for developing this data set?</b></p> <p>Each year, the U.S. Department of Housing and Urban Development (HUD) receives custom tabulations of American Community Survey (ACS) data from the U.S. Census Bureau. These data, known as the "CHAS" data (Comprehensive Housing Affordability Strategy), demonstrate the extent of housing problems and housing needs, particularly for low income households. The CHAS data are used by local governments to plan how to spend HUD funds, and may also be used by HUD to distribute grant funds.</p> <p><b>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</b></p> <p>Data was collected for all of Shelby County and the City of Memphis, but not specifically the Urban County. Data for the City of Memphis was subtracted from the data for Shelby County in order to come up with Urban County stand-alone data.</p> <p><b>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</b></p> <p>2011-2015</p>

	<p><b>What is the status of the data set (complete, in progress, or planned)?</b></p> <p>Complete</p>
4	<p><b>Data Source Name</b></p> <p>2017 CoC Homelessness Populations/Subpop. Reports</p>
	<p><b>List the name of the organization or individual who originated the data set.</b></p> <p>HUD by way of CoCs in the application for CoC Homeless Assistance Programs</p>
	<p><b>Provide a brief summary of the data set.</b></p> <p>Continuum of Care (CoC) Homeless Assistance Programs Homeless Populations and Subpopulations Reports provide counts for sheltered and unsheltered homeless persons by household type and subpopulation, available at the national and state level, and for each CoC. The reports are based on Point-in-Time (PIT) information provided to HUD by CoCs in the application for CoC Homeless Assistance Programs. The PIT Count provides a count of sheltered and unsheltered homeless persons on a single night during the last ten days in January.</p>
	<p><b>What was the purpose for developing this data set?</b></p> <p>To provide data on homelessness</p>
	<p><b>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</b></p> <p>PIT data from January 2017</p>
	<p><b>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</b></p> <p>PIT data from January 2017</p>
	<p><b>What is the status of the data set (complete, in progress, or planned)?</b></p> <p>Complete</p>
5	<p><b>Data Source Name</b></p> <p>2013-2017 ACS 5 Year Estimates</p>
	<p><b>List the name of the organization or individual who originated the data set.</b></p> <p>The United States Census Bureau</p>
	<p><b>Provide a brief summary of the data set.</b></p> <p>Data on Urban Shelby County is not collected by any reporting agency, and thus must be extrapolated from total Shelby County and City of Memphis data. In cases of real numbers such as population and household, the urban county data is taken by subtracting City of Memphis from overall Shelby County data.</p>

	<p><b>What was the purpose for developing this data set?</b></p> <p>The American Community Survey (ACS) helps local officials, community leaders, and businesses understand the changes taking place in their communities. It is the premier source for detailed population and housing information about our nation.</p>
	<p><b>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</b></p> <p>Data on Urban Shelby County is not collected by any reporting agency, and thus must be extrapolated from total Shelby County and City of Memphis data. In cases of real numbers such as population and household, the urban county data is taken by subtracting City of Memphis from overall Shelby County data.</p>
	<p><b>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</b></p> <p>2013-2017 ACS 5 Year Estimates</p>
	<p><b>What is the status of the data set (complete, in progress, or planned)?</b></p> <p>Completed</p>
6	<p><b>Data Source Name</b></p> <p>2006-2010, 2013-2017 ACS</p>
	<p><b>List the name of the organization or individual who originated the data set.</b></p> <p>The United States Census Bureau</p>
	<p><b>Provide a brief summary of the data set.</b></p> <p>Data on Urban Shelby County is not collected by any reporting agency, and thus must be extrapolated from total Shelby County and City of Memphis data. In cases of real numbers such as population and household, the urban county data is taken by subtracting City of Memphis from overall Shelby County data.</p>
	<p><b>What was the purpose for developing this data set?</b></p> <p>The American Community Survey (ACS) helps local officials, community leaders, and businesses understand the changes taking place in their communities. It is the premier source for detailed population and housing information about our nation.</p>
	<p><b>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</b></p> <p>Data on Urban Shelby County is not collected by any reporting agency, and thus must be extrapolated from total Shelby County and City of Memphis data. In cases of real numbers such as population and household, the urban county data is taken by subtracting City of Memphis from overall Shelby County data.</p>

	<p><b>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</b></p> <p>2006-2010, 2013-2017 ACS</p>
	<p><b>What is the status of the data set (complete, in progress, or planned)?</b></p> <p>Complete</p>
7	<p><b>Data Source Name</b></p> <p>2017 HUD FMR and HOME Rents, Memphis, TN-MS-AR</p>
	<p><b>List the name of the organization or individual who originated the data set.</b></p> <p>The U.S. Department of Housing and Urban Development</p>
	<p><b>Provide a brief summary of the data set.</b></p> <p>Fair Market Rents (FMRs) are used to determine payment standard amounts for the Housing Choice Voucher program, to determine initial renewal rents for some expiring project-based Section 8 contracts, to determine initial rents for housing assistance payment (HAP) contracts in the Moderate Rehabilitation Single Room Occupancy program (Mod Rehab), rent ceilings for rental units in both the HOME Investment Partnerships program and the Emergency Solution Grants program, calculation of maximum award amounts for Continuum of Care recipients and the maximum amount of rent a recipient may pay for property leased with Continuum of Care funds, and calculation of flat rents in Public Housing units.</p>
	<p><b>What was the purpose for developing this data set?</b></p> <p>Fair Market Rents (FMRs) are used to determine payment standard amounts for the Housing Choice Voucher program, to determine initial renewal rents for some expiring project-based Section 8 contracts, to determine initial rents for housing assistance payment (HAP) contracts in the Moderate Rehabilitation Single Room Occupancy program (Mod Rehab), rent ceilings for rental units in both the HOME Investment Partnerships program and the Emergency Solution Grants program, calculation of maximum award amounts for Continuum of Care recipients and the maximum amount of rent a recipient may pay for property leased with Continuum of Care funds, and calculation of flat rents in Public Housing units. The U.S. Department of Housing and Urban Development (HUD) annually estimates FMRs for Office of Management and Budget (OMB) defined metropolitan areas, some HUD defined subdivisions of OMB metropolitan areas and each nonmetropolitan county.</p>
	<p><b>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</b></p> <p>The data is based on defined metropolitan areas, some HUD defined subdivisions of OMB metropolitan areas and each nonmetropolitan county.</p>
	<p><b>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</b></p> <p>Federal FY 2017</p>

	<p><b>What is the status of the data set (complete, in progress, or planned)?</b></p> <p>Complete</p>
8	<p><b>Data Source Name</b></p> <p>2013-2017 ACS (Total Units), 2011-2015 CHAS (Units)</p>
	<p><b>List the name of the organization or individual who originated the data set.</b></p> <p>ACS- The United States Census Bureau</p> <p>CHAS- U.S. Department of Housing and Urban Development</p>
	<p><b>Provide a brief summary of the data set.</b></p> <p>Data on Urban Shelby County is not collected by any reporting agency, and thus must be extrapolated from total Shelby County and City of Memphis data. In the cases of real numbers such as population and households, the urban county data is taken by subtracting City of Memphis from overall Shelby County data.</p>
	<p><b>What was the purpose for developing this data set?</b></p> <p>The American Community Survey (ACS) helps local officials, community leaders, and businesses understand the changes taking place in their communities. It is the premier source for detailed population and housing information about our nation.</p> <p>Each year, the U.S. Department of Housing and Urban Development (HUD) receives custom tabulations of American Community Survey (ACS) data from the U.S. Census Bureau. These data, known as the "CHAS" data (Comprehensive Housing Affordability Strategy), demonstrate the extent of housing problems and housing needs, particularly for low income households. The CHAS data are used by local governments to plan how to spend HUD funds, and may also be used by HUD to distribute grant funds.</p>
	<p><b>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</b></p> <p>Data on Urban Shelby County is not collected by any reporting agency, and thus must be extrapolated from total Shelby County and City of Memphis data. In the cases of real numbers such as population and households, the urban county data is taken by subtracting City of Memphis from overall Shelby County data.</p>
	<p><b>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</b></p> <p>2013-2017 ACS (Total Units), 2011-2015 CHAS (Units)</p>
	<p><b>What is the status of the data set (complete, in progress, or planned)?</b></p> <p>Complete</p>



9	<b>Data Source Name</b> HUD's 2018 CoC Homeless Assistance Programs
	<b>List the name of the organization or individual who originated the data set.</b> The United States Department of Housing and Urban Development
	<b>Provide a brief summary of the data set.</b> Data on Facilities and Housing Targeted to Homeless Households in Shelby County were pulled from the HUD CoC website
	<b>What was the purpose for developing this data set?</b> Public information
	<b>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</b> Data on Facilities and Housing Targeted to Homeless Households in Shelby County were pulled from the HUD CoC website
	<b>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</b> Current as of 2018
	<b>What is the status of the data set (complete, in progress, or planned)?</b> Complete
10	<b>Data Source Name</b> ACS 2011-2015 (Workers), 2015 Longitudinal Employee
	<b>List the name of the organization or individual who originated the data set.</b> The United States Census Bureau
	<b>Provide a brief summary of the data set.</b> Data on Urban Shelby County is not collected, and thus must be extrapolated from total Shelby County and City of Memphis data. In cases of real numbers such as population and households, the urban county data is taken by subtracting City of Memphis from overall Shelby County data.
	<b>What was the purpose for developing this data set?</b> The American Community Survey (ACS) helps local officials, community leaders, and businesses understand the changes taking place in their communities. It is the premier source for detailed population and housing information about our nation.
	<b>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</b> Data on Urban Shelby County is not collected, and thus must be extrapolated from total Shelby County and City of Memphis data. In cases of real numbers such as population and households, the urban county data is taken by subtracting City of Memphis from overall Shelby County data.

	<p><b>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</b></p> <p>ACS 2011-2015 (Workers), 2015 Longitudinal Employer-Household Dynamics (Jobs)</p>
	<p><b>What is the status of the data set (complete, in progress, or planned)?</b></p> <p>Complete</p>
<b>11</b>	<p><b>Data Source Name</b></p> <p>Neighborhood Preservation, Inc. (NPI Memphis)</p>
	<p><b>List the name of the organization or individual who originated the data set.</b></p> <p>Neighborhood Preservation, Inc. in Memphis, Tennessee. This organization promotes neighborhood revitalization by collaboratively developing practical and sustainable resolutions to blighted properties and to the systems that lead to widespread neglect, vacancy and abandonment of real estate. The Organization focuses on policy advocacy and implementing/documenting replicable comprehensive neighborhood improvement projects.</p>
	<p><b>Provide a brief summary of the data set.</b></p> <p>NPI Memphis works with code enforcement officers, local leaders, businesses, and other stakeholders to change the state and local policy, systems, and processes in hopes of reducing number of vacant and abandoned properties. In doing so, data on vacancy is collected.</p>
	<p><b>What was the purpose for developing this data set?</b></p> <p>Data was collected in conjunction with assessing blight in Shelby County, TN</p>
	<p><b>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</b></p> <p>Reported data covers the Urban County only</p>
	<p><b>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</b></p> <p>Ongoing since at least 2015</p>
	<p><b>What is the status of the data set (complete, in progress, or planned)?</b></p> <p>In progress</p>