

State of Tennessee

2019-20 Annual Action Plan

Substantial Amendment: CDBG-CV Funding

AP-05 Executive Summary

In December 2019, a new coronavirus known as SARS-CoV-2 was first detected in Wuhan, Hubei Province, People's Republic of China, causing outbreaks of the coronavirus disease COVID-19 that has now spread globally. The first case was reported in the United States in January 2020. In March 2020, the World Health Organization declared the coronavirus outbreak a pandemic and President Trump declared the outbreak a national emergency. During this time, the majority of states have declared states of emergency with most shutting down large gathering places and limiting the movement of their residents.

As a consequence, many CPD recipients must quickly shift their operations or focus to respond to resident needs and perform services safely. Throughout Spring 2020, HUD issued program guidance, activity waivers, and CARES Act (Coronavirus Aid, Relief, and Economic Security Act), allocations to help prevent, prepare for, and respond to the COVID-19 pandemic. Tennessee sought and received waivers for the Consolidated Plan to address regulatory barriers to implement funding. The following is a brief summary of the waivers, allocations, and planned uses.

Community Development Block Grant (CDBG) Program, administered by the Tennessee Department of Economic and Community Development (ECD), COVID-19 allocation: \$16,813,334

CDBG continues to receive guidance and waivers on an ongoing basis to efficiently and effectively implement funding. Available waivers may be posted to the HUD exchange (<https://www.hudexchange.info/>) or included in applicable Federal Register notices, or interested parties may contact the Tennessee Department of Economic and Community Development (ECD) for current updates.

CDBG Plans to utilize the COVID-19 allocation as follows:

- | | |
|---|--------------|
| • Revitalize disinvested areas & improve livability | \$ 2,000,000 |
| • TA, Administration | \$ 840,667 |
| • Business Support and Technical Assistance | \$ 1,972,667 |
| • Public Services to Address Infectious Disease Impacts | \$ 2,000,000 |
| • Broadband expansion and Internet Access | \$10,000,000 |

Consolidated Planning Waivers (approved to begin using on 4/13/2020)

- 8. Citizen Participation Public Comment Period for Consolidated Plan Amendment – waives the standard public comment period and implements 5+ days for public comments on substantial amendments

- 9. Citizen Participation Reasonable Notice and Opportunity to Comment – waives the requirement to follow the approved Citizen Participation Plan and allows grantees to decide what constitutes “reasonable notice and opportunity for comment” based on the grantee’s circumstances

The full waiver guidance is available here:

<https://files.hudexchange.info/resources/documents/Availability-of-Waivers-of-CPD-Grant-Program-and-Consolidated-Plan-Requirements-to-Prevent-the-Spread-of-COVID-19-and-Mitigate-Economic-Impacts-Caused-by-COVID-19.pdf>

Updated guidance, waivers, and additional information are posted to the HUD Exchange (<https://www.hudexchange.info/>) as they become available, or interested parties may contact research@thda.org for information on how the Tennessee Consolidated Planning programs are utilizing waivers.

Summary of Citizen Participation Process and consultation process

The State of Tennessee successfully submitted and was granted a waiver to expedite the citizen’s participation process for CARES Act funding. These waivers state that citizens will be granted no fewer than five days to provide comments on the substantial amendment, and, as the requirements of the Citizen’s Participation Plan are waived, reasonable notice will be given based on the grantee’s circumstances. The purpose of these waivers is to eliminate timeliness barriers to receiving the CARES Act relief funding.

This amendment was available for public comment between June 17-23, 2020 at <https://thda.org/research-planning/consolidated-planning>. Notices were posted in English and Spanish on THDA and partner websites, distributed via email by THDA and ECD, and posted on social media. Copies of the notice, translations, email blasts, social media posts, and screenshots of website posts are available in the appendix of the final report. The waivers noted above allowed flexibility in expediting the notices, so we chose not to submit the notices to the newspapers and instead focused on electronic modes of outreach.

CDBG received and accepted 14 comments via direct contact and through the online feedback form. The full list of comments and responses are included in the appendix.

AP-12 Participation

The State of Tennessee successfully submitted and was granted a waiver to expedite the citizen’s participation process for CARES Act funding. These waivers state that citizens will be granted no fewer than five days to provide comments on the substantial amendment, and, as the requirements of the Citizen’s Participation Plan are waived, reasonable notice will be given based on the grantee’s circumstances. The purpose of these waivers is to eliminate timeliness barriers to receiving the CARES Act relief funding.

This amendment was available for public comment between June 17-23, 2020 at <https://thda.org/research-planning/consolidated-planning>. Notices were posted in English and Spanish on THDA and partner websites, distributed via email by THDA and ECD, and posted on social media. Copies of the notice, translations, email blasts, social media posts, and screenshots of website posts are available in the appendix of the final report. The waivers noted above allowed flexibility in expediting the notices, so we chose not to submit the notices to the newspapers and instead focused on electronic modes of outreach.

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AP-15 Expected Resources – 91.320(c)(1,2)

Introduction

The following table summarizes the anticipated resources, broken down by program type, allocated by the State of Tennessee during year five of the Consolidated Plan's planning period (FY 2015-2019).

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 5				Expected Amount Available Remainder of ConPlan	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG-CV	public - federal	Broadband and Internet Access Public Service Business Assistance Healthcare and First Responder Support	16,813,334	0	0	0	0	Funding allocated as part of the first tranche of funding under the CARES Act. This first tranche used the FY20 allocation formula to determine the amounts to each formula grantee. Funding must be used to address the impacts of the COVID-19 pandemics on communities.

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

The TN CDBG program awards many projects each year that will be completed on publicly-owned property, particularly water and sewer system improvement projects where work is often done at water and wastewater treatment plants or other similar properties.

AP-20 Annual Goals and Objectives – 91.320(c)(3)&(e)

Highlighted text signifies new goals for COVID-19 relief funding.

Goals >>	1. Creation and preservation of affordable housing	5. Revitalize disinvested areas & improve livability	6. TA, Administration	7. Business Support and Technical Assistance	8. Public Services to Address Infectious Disease Impacts	9. Broadband expansion and Internet Access	10. Fair housing
Funding >>	CDBG-CV: \$0	CDBG-CV: \$2,000,000	CDBG-CV: \$840,667	CDBG-CV: \$1,972,667	CDBG-CV: \$2,000,000	CDBG-CV: \$10,000,000	CDBG-CV: \$0
1. Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit (Persons Assisted/Served)		100,000					
2. Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit (Households Assisted)						2,000	
3. Public service activities other than Low/Moderate Income Housing Benefit (Persons Assisted)					50,000	5,000	
17. Businesses assisted (Businesses Assisted)				200			
24. Other (Other)			50				

Goal Descriptions

1	Goal Name	Creation and preservation of affordable housing
	Goal Description	Create and maintain affordable rental and homeownership stock with the construction of new affordable housing, rehabilitate existing affordable housing, provide down payment assistance, and provide tenant-based rental assistance to eligible populations. CDBG-CV Allocation: \$0 CDBG Prior Year: 0
4	Goal Name	Physical infrastructure development
	Goal Description	Provide resources to cities and communities to update and repair water and sewer systems. Also, create the base of infrastructure that will provide for a high quality of life for individuals, productive capacity for communities, and that will support economic development. CDBG-CV Allocation: \$0 CDBG Prior Year: 0
5	Goal Name	Revitalize disinvested areas & improve livability
	Goal Description	Provide communities with resources to revitalize public and community infrastructure and assets to improve the livability of communities. CDBG-CV Allocation: \$2,000,000 CDBG Prior Year: 0
6	Goal Name	TA, Administration
	Goal Description	Cost of designing and administering CDBG programs and activities. CDBG-CV Allocation: \$840,667 CDBG Prior Year: 0
7	Goal Name	Business Support and Technical Assistance
	Goal Description	Provide resources to CDFIs and non-profit organization to provide deep technical assistance to Main Street businesses to help the business adapt, recover, and pivot due to COVID impacts. CDBG Annual Allocation: \$1,972,667 CDBG Prior Year: 0
8	Goal Name	Public Services to Address Infectious Disease Impacts
	Goal Description	Provide support to communities through public services to address the impacts of infectious disease pandemics and the policies, practices, and of mandates to address the pandemics. CDBG Annual Allocation: \$2,000,000 CDBG Prior Year: 0

9	Goal Name	Broadband Expansion and Internet Access
	Goal Description	Expand to broadband and internet access to unserved and underserved areas to accommodate work-from-home and remote learning and maintaining social distancing guidelines. CDBG-CV Allocation: \$10,000,000 CDBG Prior Year: 0
10	Goal Name	Fair housing
	Goal Description	Affirmatively furthering fair housing by providing training and technical assistance to communities, organizations, realtors, lenders and other stakeholders. Also provide fair housing counseling, outreach, and education to households, organizations, realtors, lenders and other stakeholders.

AP-25 Allocation Priorities – 91.320(d)

Introduction

Tennessee will address the strategic housing and community needs as articulated in the Consolidated Plan through the five Consolidated Planning grants and other resources that the state and HUD provide to address this need.

Funding Allocation Priorities

	Creation and preservation of affordable housing (%)	Physical infrastructure development (%)	Revitalize disinvested areas & improve livability (%)	TA, Administration (%)	Business Support and Technical Assistance (%)	Public Services to Address Infectious Disease Impacts (%)	Broadband Expansion and Internet Access (%)	Fair housing (%)	Total (%)
CDBG-CV	0	0	12	5	12	12	59	0	100

Reason for Allocation Priorities

A survey was released to assess the needs of communities in Tennessee due the impacts of the COVID-19 pandemic. The allocation priorities reflect the over 300 responses from representatives of Local Governments, Local Economic Development Organizations, Non-profit Community Development Organizations, Non-profit Housing Organizations, Local Development Districts, Utility Districts, Consultants to Local Governments, and more.

AP-30 Methods of Distribution – 91.320(d)&(k)

Introduction

Each of the five Consolidated Planning Programs has its own method of distribution. Each method is intended to ensure that all eligible areas can compete for these funds. Program specific need-based preferences can be found in these methods of distribution.

Distribution Methods

Table 1 - Distribution Methods by State Program

1	State Program Name:	CDBG-CV Broadband Expansion and Internet Access
	Funding Sources:	CDBG-CV
	Describe the state program addressed by the Method of Distribution.	<p>The CARES Act appropriated \$5 billion to supplement the CDBG program to respond to and address the impacts of the COVID-19 pandemic. The Act established funds would be released in three tranches, the first of which is based on the FY20 funding formula. The State of Tennessee is establishing new programs and supplementing some existing programs to distribute these funds based on the needs communicated by the communities and the organizations which support these communities.</p> <p>Due to unprecedented need and use of these funds, the State of Tennessee intends to maintain the flexibility to adjust program allocation amounts to meet the needs and demands of the communities.</p>

<p>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</p>	<p>The full criteria are still being established to select beneficiaries of this program. The following must be met:</p> <ul style="list-style-type: none"> • Activity must meet a National Objective. • Applicant must be an eligible entity. • Target areas must be unserved or underserved. • Area being served must not be receiving other financial benefits that would create a duplication of benefit. • Funds must be used for the following eligible activities (all new or improved service must meet the FCC threshold for broadband): <ul style="list-style-type: none"> ○ Build out of new or improved (meets FCC threshold) broadband infrastructure. ○ Rehabilitation of PHA-owned structures to provide internet access ○ Creation of a technology bank to provide access to remote education and work-from-home opportunities. • Applicants must be joint between a local government and an eligible internet service provider (ISP) for build-out. <p>The following are being strongly considered, but are not yet finalized:</p> <ul style="list-style-type: none"> • Priority given to ISPs who provide an income-based service plan for low-income residents • Priority given to communities with digital literacy programs <p>The build-out of broadband infrastructure will follow guidelines, rules, and procedures similar to the water and sewer infrastructure grants that are administered as part of the regular round CDBG program. The technology bank activities will be funded as public services.</p>
<p>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</p>	<p>Guidance and applications are being developed, and will be available on the TNECD website</p>

	Describe how resources will be allocated among funding categories.	Broadband Infrastructure \$6,000,000 PHA Internet Access \$2,000,000 Technology Banks \$2,000,000 Total \$10,000,000 Will be adjusted based on demand and need.
	Describe threshold factors and grant size limits.	<u>Grantee Max</u> Broadband Infrastructure Max \$1,000,000 PHA Internet Access Max \$500,000 Technology Banks Max \$500,000
	What are the outcome measures expected as a result of the method of distribution?	Number of households assisted Number of persons assisted

2	State Program Name:	CDBG-CV Business Support and Technical Assistance
	Funding Sources:	CDBG-CV
	Describe the state program addressed by the Method of Distribution.	<p>The CARES Act appropriated \$5 billion to supplement the CDBG program to respond to and address the impacts of the COVID-19 pandemic. The Act established funds would be released in three tranches, the first of which is based on the FY20 funding formula. The State of Tennessee is establishing new programs and supplementing some existing programs to distribute these funds based on the needs communicated by the communities and the organizations which support these communities.</p> <p>Due to unprecedented need and use of these funds, the State of Tennessee intends to maintain the flexibility to adjust program allocation amounts to meet the needs and demands of the communities.</p>

<p>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</p>	<p>The full criteria are still being established to select beneficiaries of this program. The following must be met:</p> <ul style="list-style-type: none"> • Activity must meet a National Objective. • Applicant must be an eligible entity. • Applicant must show how assisted businesses have been affected by COVID. • Applicant and assisted businesses must not be receiving other financial benefits that would create a duplication of benefit. • Application and scoring will be modeled on the existing Microenterprise Assistance program. <p>The following are being strongly considered, but are not yet finalized:</p> <ul style="list-style-type: none"> • Priority for industry sectors most impacted by COVID • Priority for assisting businesses with 25 or fewer employees (including owners) • Priority for serving business in Main Street or TN Downtown communities. <p>The program will use non-profit and CDFI providers to target deep technical assistance to businesses affected by COVID. They will advise and guide participating businesses to adapt and/or pivot the business models to address the impact of COVID and the new economic environment. Technical assistance provided may include disaster planning, succession planning, legal guidance, business plan revision, education to business owners, etc.</p>
<p>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</p>	<p>Guidance and applications are being developed.</p>

	Describe how resources will be allocated among funding categories.	Total \$1,972,667 Will be adjusted based on demand and need.
	Describe threshold factors and grant size limits.	Regional Max \$200,000 County Max \$50,000
	What are the outcome measures expected as a result of the method of distribution?	Number of businesses assisted

3	State Program Name:	CDBG-CV Public Services
	Funding Sources:	CDBG-CV
	Describe the state program addressed by the Method of Distribution.	<p>The CARES Act appropriated \$5 billion to supplement the CDBG program to respond to and address the impacts of the COVID-19 pandemic. The Act established funds would be released in three tranches, the first of which is based on the FY20 funding formula. The State of Tennessee is establishing new programs and supplementing some existing programs to distribute these funds based on the needs communicated by the communities and the organizations which support these communities.</p> <p>Due to unprecedented need and use of these funds, the State of Tennessee intends to maintain the flexibility to adjust program allocation amounts to meet the needs and demands of the communities.</p>

<p>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</p>	<p>The full criteria are still being established to select beneficiaries of this program. The following must be met:</p> <ul style="list-style-type: none"> • Public service must meet a National Objective. • Activity must be carried out by an eligible entity. • Public service must address impacts of COVID-19. • Must be an expansion of existing or new public service. • Must be an eligible public service activity <p>The following are being strongly considered, but are not yet finalized:</p> <ul style="list-style-type: none"> • Percentage of population that are vulnerable • Impact of COVID-19 to applicant's budget <p>COVID-19 has significantly increased the number of people who need assistance, while at the same time negatively impacting budgets for local governments and support organizations who typically meet this need. The following activities are eligible under public services that are creating new services, expanding the coverage area, and address increased usage and capacity:</p> <p>Community</p> <ul style="list-style-type: none"> • Meal and food delivery • Support for food banks • Housing counseling • Mental health counseling • Substance abuse services <p>Economic</p> <ul style="list-style-type: none"> • Job training through technical colleges and eligible providers
<p>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</p>	<p>Guidance and applications are being developed.</p>

	Describe how resources will be allocated among funding categories.	Community \$1,000,000 Economic \$1,000,000 Total \$2,000,000 Will be adjusted based on demand and need.
	Describe threshold factors and grant size limits.	Regional Grant Max \$500,000 County Grant Max \$100,000
	What are the outcome measures expected as a result of the method of distribution?	Number of persons assisted Number of LMI persons assisted Number of persons receiving job training placed

4	State Program Name:	CDBG-CV Healthcare/First Responder Assistance
	Funding Sources:	CDBG-CV
	Describe the state program addressed by the Method of Distribution.	<p>The CARES Act appropriated \$5 billion to supplement the CDBG program to respond to and address the impacts of the COVID-19 pandemic. The Act established funds would be released in three tranches, the first of which is based on the FY20 funding formula. The State of Tennessee is establishing new programs and supplementing some existing programs to distribute these funds based on the needs communicated by the communities and the organizations which support these communities.</p> <p>Due to unprecedented need and use of these funds, the State of Tennessee intends to maintain the flexibility to adjust program allocation amounts to meet the needs and demands of the communities.</p>

	<p>Describe all of the criteria that will be used to select applications and the relative importance of these criteria.</p>	<p>The full criteria are still being established to select beneficiaries of this program. The following must be met:</p> <ul style="list-style-type: none"> • Applicant must be an eligible entity • Activity must meet a National Objective. • Activity must be carried out by a unit of local government. • Applicant must be able to show how COVID-19 has directly impacted the local healthcare system and/or the ability to respond to emergencies. • Applicant must show how one of the following, relate to COVID-19, will be improved: <ul style="list-style-type: none"> ○ Emergency response ○ Emergency transport ○ Testing for and treatment of patients • Applicants must provide documentation of other assistance received to verify no duplication of benefits. <p>The following are being strongly considered, but are not yet finalized:</p> <ul style="list-style-type: none"> • County-level COVID-19 infection data. • Region-level COVID-19 infection data. • Cost compared to budget associated with COVID-19 response. <p>COVID-19 has created direct impacts and ripple effects across the emergency response community throughout Tennessee. Some cities and counties are dealing with outbreaks, while other are actively in a support role through use of personnel and equipment. Still other communities don't have hospitals or free-standing health clinics but transport patients to other communities nearby. This program intends to provide first responders and healthcare facilities with the equipment needed to improve emergency response, emergency transport, and testing for and treatment of patients with COVID-19.</p>
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	<p>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</p>	<p>Guidance and applications are being developed.</p>
	<p>Describe how resources will be allocated among funding categories.</p>	<p>Medical and emergency equipment \$2,000,000</p> <p>Will be adjusted based on demand and need.</p>
	<p>Describe threshold factors and grant size limits.</p>	<p>\$200,000</p>
	<p>What are the outcome measures expected as a result of the method of distribution?</p>	<p>Number of persons tested</p> <p>Number of patients treated</p>

AP-50 Geographic Distribution – 91.320(f)

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

All applicants for the TN CDBG program are considered and scored based on need. There is not a specific geographic distribution planned.

AP-90 Program Specific Requirements – 91.320(k)(1,2,3)

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.320(k)(1)

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

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

Other CDBG Requirements

1. The amount of urgent need activities (CDBG-CV only)	4,439,600
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.	70.00%

Notice of CDBG COVID-19 (CDBG-CV) Funding Amendment

Review and Comment: June 17-23, 2020

[Amendment Draft](#)

[Submit a Comment](#)

The Tennessee Housing Development Agency (THDA) and Tennessee Department of Economic and Community Development (ECD) have released an amendment to the 2019-2020 State of Tennessee Annual Action Plan detailing new COVID-19 CARES Act funding for the Community Development Block Grant (CDBG) Program. The State of Tennessee CDBG program has received an allocation of \$16,813,334 targeting economic and community development efforts related to COVID-19. In order to promptly award this CDBG-CV funding, the U.S. Department of Housing and Urban Development (HUD) has granted Tennessee waivers to shorten the public comment period to no less than 5 days and offer reasonable opportunity for comment, while waiving the full requirements of the Citizen Participation Plan.

Citizens are encouraged to review and/or comment on this amendment between June 17-23, 2020. Additional COVID-19 related amendments may be forthcoming. Check this website for ongoing updates.

Notificación de la enmienda de financiación del programa CDBG (CDBG-CV) debido a la COVID-19 Revisión y comentarios: del 17 al 23 de junio de 2020

[Resumen en ingles](#)

[Comentar](#)

La Agencia de Desarrollo de Viviendas de Tennessee (THDA) y el Departamento de Desarrollo Económico y Comunitario de Tennessee (ECD) han publicado una enmienda al Plan de acción anual del estado de Tennessee 2019-2020 que detalla los nuevos fondos de la Ley CARES por la COVID-19 destinados al programa de Subvención para el desarrollo comunitario (CDBG). Para el programa CDBG del estado de Tennessee se asignaron \$16,813,334 destinados a los esfuerzos de desarrollo económico y comunitario relacionados con la COVID-19. Con el fin de otorgar los fondos del programa CDBG-CV rápidamente, el Departamento de Vivienda y Desarrollo Urbano de Estados Unidos (HUD) le concedió a Tennessee permisos para reducir el período de comentarios públicos a 5 días como mínimo y así ofrecer una cantidad de tiempo razonable para hacer comentarios; también eliminó los requisitos completos del Plan de participación ciudadana.

Se anima a los ciudadanos a revisar y comentar esta enmienda entre el 17 y el 23 de junio de 2020. Es posible que pronto haya más enmiendas relacionadas con la COVID-19. Visite el sitio web para conocer las actualizaciones en curso.

Community Development Block Grant

tn.gov/e cd /community-development-block-grant/cdbg.html

TN

Advantages Industries Corporate Expansion Small Business Rural Development News Resources Grants

Community Development Block Grant

Community Development Block Grant

About CDBG

Community Development ("Regular Round")

Disaster CDBG Program

CDBG Coronavirus Response Supplement (CDBG-CV)

Fair Housing

Annual Action Plan

CDBG Manual

Annual and Final Report

CDBG Applications

CDBG Program Survey

Appalachian Regional Commission

Delta Regional Authority

Community Development Block Grant

PUBLIC NOTICE: CDBG-CV

Notice of CDBG COVID-19 (CDBG-CV) Funding Amendment

Review and Comment: June 17-23, 2020

To review or comment on the CDBG-CV Amendment, please visit <https://thda.org/research-planning/consolidated-planning>.

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For additional information and to review the CDBG-CV Amendment, please visit <https://thda.org/research-planning/consolidated-planning>. Citizens are encouraged to review and/or comment on this amendment between June 17-23, 2020. Additional COVID-19 related amendments may be forthcoming. Check the website listed for ongoing updates.

Notificación de la enmienda de financiación del programa CDBG (CDBG-CV) debido a la COVID 19

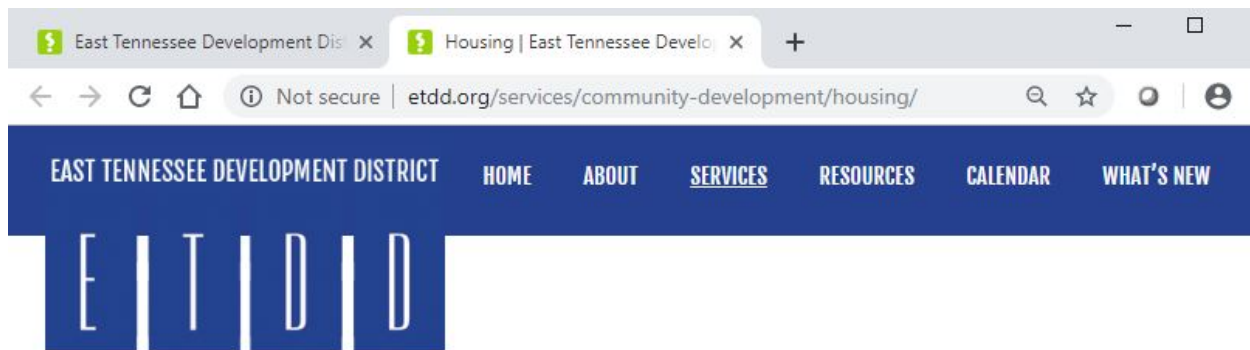
Revisión y comentarios: del 17 al 23 de junio de 2020

Para comentar y revisar la enmienda CDBG-CV, visite <https://thda.org/research-planning/consolidated-planning>.

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Para obtener más información y revisar las enmiendas CDBG-CV, visite <https://thda.org/research-planning/consolidated-planning>. Se anima a los ciudadanos a revisar y comentar esta enmienda entre el 17 y el 23 de junio de 2020. Es posible que pronto haya más enmiendas relacionadas con la COVID-19. Visite el sitio web indicado anteriormente para conocer las actualizaciones en curso.

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Notificación de la enmienda de financiación del programa CDBG (CDBG-CV) debido a la COVID-19

Revisión y comentarios: del 17 al 23 de junio de 2020

<https://thda.org/research-planning/consolidated-planning>

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Notice of CDBG COVID-19 (CDBG-CV) Funding Amendment

Review & Comment; June 17 - 23- 2020

Notice of CDBG COVID-19 (CDBG-CV) Funding Amendment
Review and Comment: June 17-23, 2020

<https://thda.org/research-planning/consolidated-planning>

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Revisión y comentarios: del 17 al 23 de junio de 2020

<https://thda.org/research-planning/consolidated-planning>

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June 16, 2020 2:30 PM

Notice of CDBG COVID-19 (CDBG-CV) Funding Amendment Review and Comment Period

Notice of CDBG COVID-19 (CDBG-CV) Funding Amendment
Review and Comment: June 17-23, 2020

The Tennessee Housing Development Agency (THDA) and Tennessee Department of Economic and Community Development (ECD) have released an amendment to the 2019-2020 State of Tennessee Annual Action Plan detailing new COVID-19 CARES Act funding for the Community Development Block Grant (CDBG) Program. The State of Tennessee CDBG program has received an allocation of \$16,813,334 targeting economic and community development efforts related to COVID-19. In order to promptly award this CDBG-CV funding, the U.S. Department of Housing and Urban Development (HUD) has granted Tennessee waivers to shorten the public comment period to no less than 5 days and offer reasonable opportunity for comment, while waiving the full requirements of the Citizen Participation Plan. For additional information and to review the CDBG-CV Amendment, please visit <https://thda.org/research-planning/consolidated-planning>. Citizens are encouraged to review and/or comment on this amendment between June 17-23, 2020. Additional COVID-19 related amendments may be forthcoming. Check the website listed for ongoing updates.

Notificación de la enmienda de financiación del programa CDBG (CDBG CV) debido a la COVID 19
Revisión y comentarios: del 17 al 23 de junio de 2020
<https://thda.org/research-planning/consolidated-planning>

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Notice of CDBG Covid-19 (CDBG_CV) Funding Amendment

Notice of CDBG COVID-19 (CDBG-CV) Funding Amendment

Review and Comment: June 17-23, 2020

<https://thda.org/research-planning/consolidated-planning>

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Revisión y comentarios: del 17 al 23 de junio de 2020

<https://thda.org/research-planning/consolidated-planning>

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HOMEMAKERS and PERSONAL CARE ATTENDANTS

NWTHRA is seeking, part-time Homemakers and Personal Care Attendants for Dyersburg, TN and also those willing to work in Benton, Carroll

Tennessee Housing
Development Agency

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Northwest Tn Human Resource A...

Notice of CDBG-CV Funding

The Community Development Block Grant (CDBG) Program has received \$16,813,334 to respond to COVID-19. See below for details on the amended plan and how to give feedback.

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Draft Amendment

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June 18 at 8:52 AM · 🌐

Notice of CDBG-CV Funding

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Now Open from June 17-23, 2020

Draft Amendment

Submit a Comment

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Notificación de la enmienda de financiación del programa CDBG (CDBG-CV) debido a la COVID-19

Revisión y comentarios: del 17 al 23 de junio de 2020

Resumen en Ingles

Comentar

Para comentar y revisar la enmienda CDBG-CV, visite <https://thda.org/research-planning/consolidated-planning>.

La Agencia de Desarrollo de Viviendas de Tennessee (THDA) y el Departamento de Desarrollo Económico y Comunitario de Tennessee (ECD)

han publicado una enmienda al Plan de acción anual del estado de Tennessee 2019-2020 que detalla los nuevos fondos de la Ley CARES por

Comentar

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Para preguntas y ayuda con el idioma, envíe un correo electrónico a Research@THDA.org.

Thank you for your participation!
¡Gracias por participar!

For more information on the Consolidated Planning process, updates, and to view prior year reports, please visit <https://thda.org/research-planning/consolidated-planning>.



2

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Notice of CDBG COVID-19 (CDBG-CV) Funding Amendment

Review and Comment: June 17-23, 2020

<https://thda.org/research-planning/consolidated-planning>

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Revisión y comentarios: del 17 al 23 de junio de 2020

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setd southeast tennessee development housing program

The Southeast Tennessee Development District's (SETDD) housing program is funded through grants from Tennessee Housing Development Agency (THDA). We provide technical assistance and grant writing to the communities in our ten county region. We also assist in the development of non-profit organizations who are interested in low income housing in our area.

HOME Program

These are federal funds awarded through a THDA State-wide competitive process. The program goal is to bring substandard housing into compliance with HUD housing quality standards as well as local building codes. Examples of eligible work may include plumbing, electrical, foundations, roof replacement or repairs, handicap accessibility, windows and door replacements. These forgivable grants are awarded as a grant to low income homeowners who live in the home.

HOME / CONTRACTORS Public Notice

For more information, please contact Emmalyn Bradford at (423) 424-4260 or by email at eb Bradford@sedev.org.

- [Notice of CDBG COVID-19 \(CDBG-CV\) Funding Amendment. Review and Comment: June 17-23, 2020](#)
- [Notificación de la enmienda de financiación del programa CDBG \(CDBG-CV\) debido a la COVID-19 Revisión y comentarios: del 17 al 23 de junio de 2020](#)

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Tennessee Housing Development Agency (THDA)

As the State's housing finance agency, the Tennessee Housing Development Agency (THDA) is a self-sufficient, independently funded, publicly accountable entity of the State of Tennessee. THDA's mission is to ensure that every Tennessean has access to safe, sound, affordable housing opportunities. More information about THDA programs can be found online at www.thda.org.

[Notice of CDBG COVID-19 \(CDBG-CV\) Funding Amendment](#)

[Notificación de la enmienda de financiación del programa CDBG \(CDBG-CV\) debido a la COVID-19](#)

Notice_of_CDBG_COVID_Funding | swtdd.org/images/uploads/site-documents/Notice_of_CDBG_COVID_Funding_Amendment.pdf

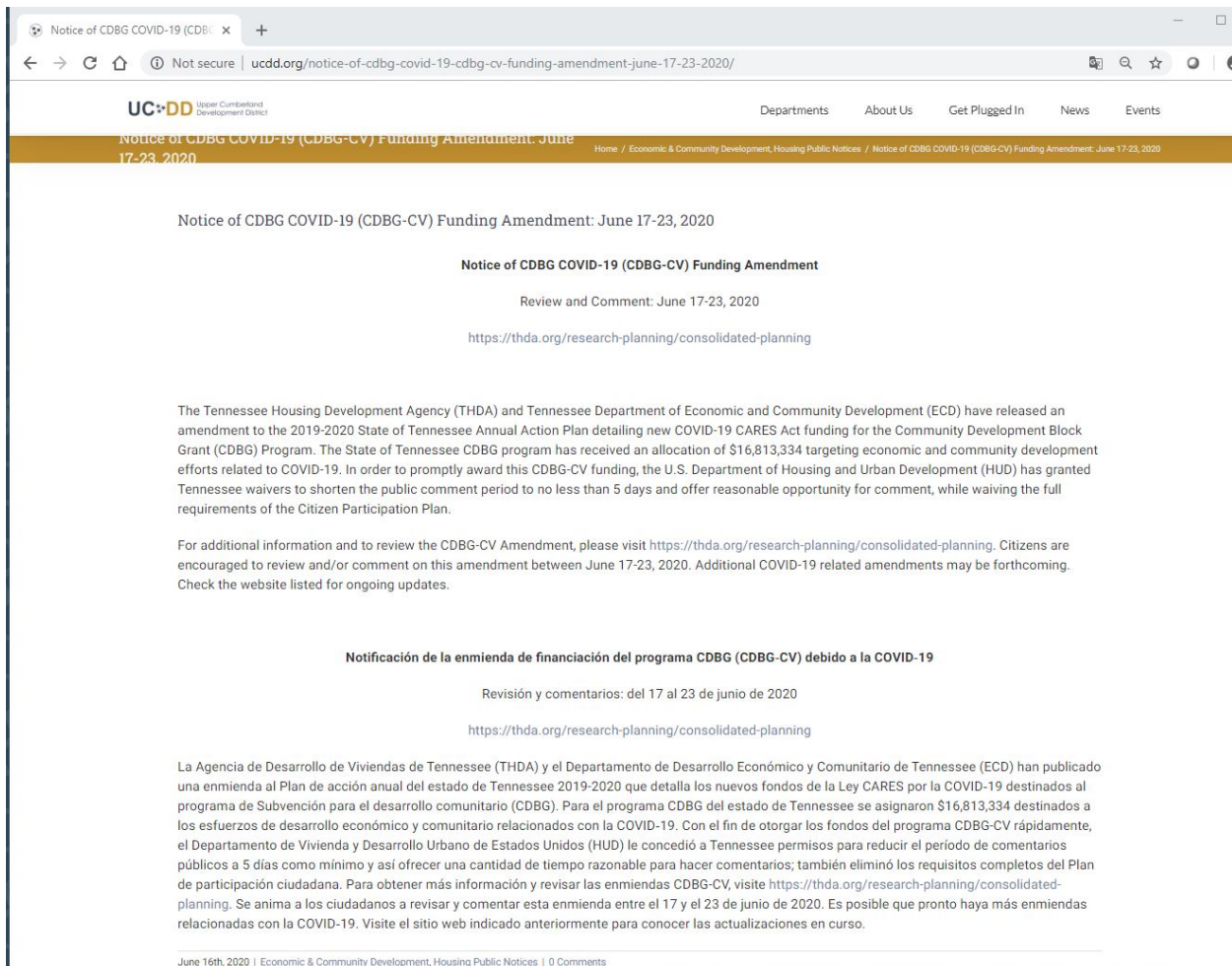
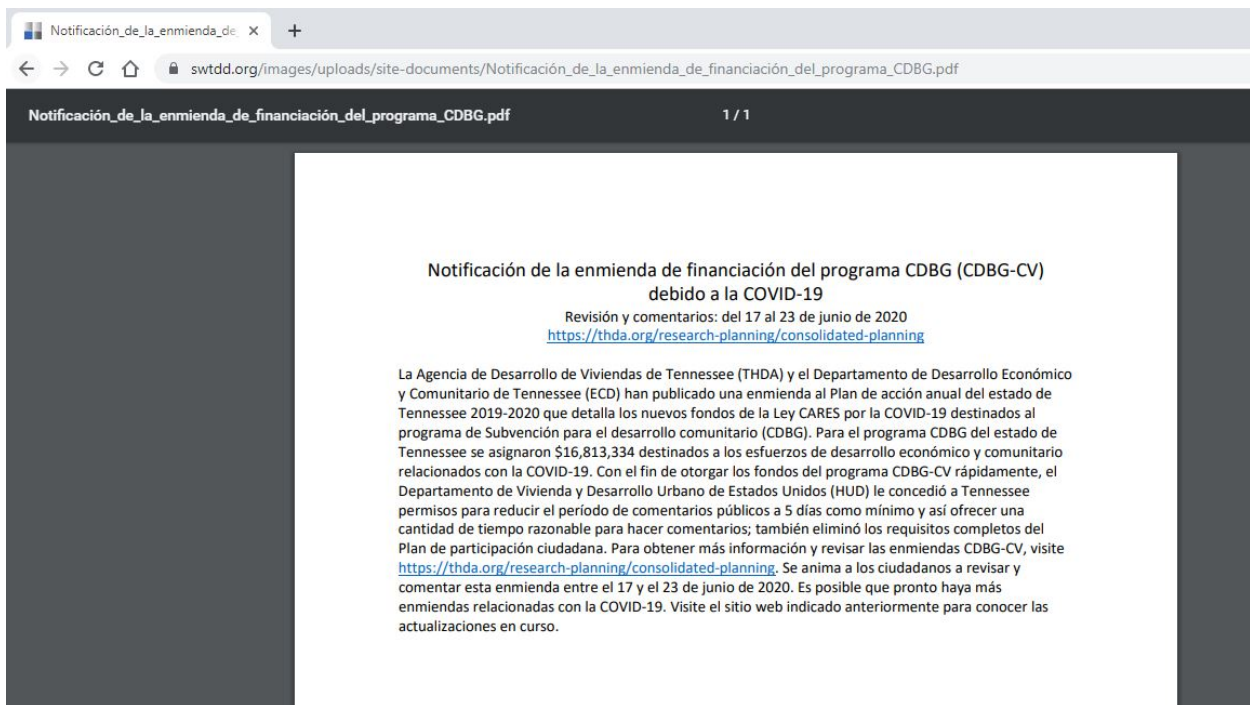
Notice of CDBG COVID-19 (CDBG-CV) Funding Amendment

Review and Comment: June 17-23, 2020

<https://thda.org/research-planning/consolidated-planning>

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Tennessee Housing Development

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Tennessee Housing Development Agency

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The CDBG (Community Development Block Grant) Program, administered by the Department of Economic and Community Development, was recently awarded \$16,813,334 in Cares Act Funding to prepare for and respond to COVID-19. Please review and comment on the plan for the funding between June 17-23 at <https://thda.org/research-planning/consolidated-planning>



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Consolidated Planning

Due to new protocols to mitigate the spread of COVID-19, THDA and...

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THDA @TN_Housing_Dev · Jun 18

The Community Dev. Block Grant Program, administered by Dept of Economic and Comm. Development, was awarded \$16,813,334 in Cares Act Funding to prepare and respond to COVID-19. Please review and comment on the plan for the funding between June 17-23 at



Consolidated Planning

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From: [TN Housing Development Agency](#)
To: [Megan Webb](#)
Subject: Notice of CDBG COVID-19 (CDBG-CV) Funding Amendment
Date: Thursday, June 18, 2020 9:39:35 AM

EXTERNAL EMAIL



Notice of CDBG-CV Funding

The Community Development Block Grant (CDBG) Program has received \$16,813,334 to respond to COVID-19. See below for details on the amended plan and how to give feedback.

Now Open from June 17-23, 2020

[Draft Amendment](#)
[Submit a Comment](#)

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Notificación de la enmienda de financiación del programa CDBG (CDBG-CV) debido a la COVID-19
Revisión y comentarios: del 17 al 23 de junio de 2020

[Resumen en Ingles](#)
[Comentar](#)

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<https://thda.org/research-planning/consolidated-planning>.

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Thank you for your participation!
¡Gracias por participar!



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Our Partners:



Andrew Jackson Building, Third Floor
502 Deaderick Street
Nashville, TN 37243

www.THDA.org

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CDBG COVID-19 (CDBG-CV) Amendment 1 Public Comment Form

Public Comment Period Open June 17-23, 2020

The Tennessee Housing Development Agency (THDA) and Tennessee Department of Economic and Community Development (ECD) have released an amendment to the 2019-2020 State of Tennessee Annual Action Plan detailing new COVID-19 CARES Act funding for the Community Development Block Grant (CDBG) Program. The State of Tennessee CDBG program has received an allocation of \$16,813,334 targeting economic and community development efforts related to COVID-19. In order to promptly award this CDBG-CV funding, the U.S. Department of Housing and Urban Development (HUD) has granted Tennessee waivers to shorten the public comment period to no less than 5 days and offer reasonable opportunity for comment, while waiving the full requirements of the Citizen Participation Plan.

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Thank you for your participation!

Please select English or Spanish below. Contact research@thda.org for additional language support.

Note: All accepted comments will be published in the report, but will not include personal information.

* Select Language/Seleccione el Idioma

CDBG COVID-19 (CDBG-CV) Amendment 1 Public Comment Form

English

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Please submit your comments below.

[Optional] Enter your name and email address if you would like a member of staff to contact you about your response. Your contact information will be kept private.

CDBG COVID-19 (CDBG-CV) Amendment 1 Public Comment Form

Español

La Agencia de Desarrollo de Viviendas de Tennessee (THDA) y el Departamento de Desarrollo Económico y Comunitario de Tennessee (ECD) han publicado una enmienda al Plan de acción anual del estado de Tennessee 2019-2020 que detalla los nuevos fondos de la Ley CARES por la COVID-19 destinados al programa de Subvención para el desarrollo comunitario (CDBG). Para el programa CDBG del estado de Tennessee se asignaron \$16,813,334 destinados a los esfuerzos de desarrollo económico y comunitario relacionados con la COVID-19.

Con el fin de otorgar los fondos del programa CDBG-CV rápidamente, el Departamento de Vivienda y Desarrollo Urbano de Estados Unidos (HUD) le concedió a Tennessee permisos para reducir el período de comentarios públicos a 5 días como mínimo y así ofrecer una cantidad de tiempo razonable para hacer comentarios; también eliminó los requisitos completos del Plan de participación ciudadana.

Para obtener más información y revisar las enmiendas CDBG-CV, visite <https://thda.org/research-planning/consolidated-planning>. Se anima a los ciudadanos a revisar y comentar esta enmienda entre el 17 y el 23 de junio de 2020. Es posible que pronto haya más enmiendas relacionadas con la COVID-19. Visite el sitio web indicado anteriormente para conocer las actualizaciones en curso.

Por favor, presente su comentario abajo.

[Opcional] Introduzca su nombre y dirección de correo electrónico si desea que un miembro del personal le contacte en cuanto a su respuesta. Su información de contacto permanecerá en privado.

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Thank You!

Thank you for your participation!

¡Gracias por participar!

Questions: Research@THDA.org

CDBG-CV Amendment 1: Public Comments and Responses

Comment 1: I would suggest that local governments be allowed to have more than one CDBG project open at a time. much the same way it was done with ARRA funds.

Response 1: Local governments and organizations who are current recipients of regular round or CDBG-NDR funds will not be excluded from receiving CDBG-CV funds.

Comment 2: I understand the importance of broadband, but feel there are much greater needs for these additional funds in infrastructure across the state. Businesses, citizens, and governments have all been greatly impacted and financially strapped - infrastructure systems still have major upgrade needs that communities won't be able to afford which will result in increased rates which citizens and businesses can't afford right now. More than ever communities need to be able to support their struggling companies and future recruitment potential. Strong infrastructure is a must and where I feel the majority of these additional COVID funds should be spent.

Response 2: The CARES Act stipulates that CDBG-CV funds be used *"to prevent, prepare for, and respond to coronavirus"*. While the need for improved traditional infrastructure, such as water, sewer, roads, etc. are recognized, are consideration of the intent of the funds and eligible programs, we determined that investment in traditional infrastructure does not address the impacts of coronavirus as directly as expanded broadband access and improve connectivity.

Comment 3: In todays society access to the internet has become an essential part of life. It's a tool that bring digital literacy to America. The sad part is that many of the residents in public housing cannot afford the cost or the Authority has not installed the ability to have the internet connected. Making the internet accessible to Low-Income Public Housing residents is not a great thought but a necessary requirement in today's society. Authorities that want their residents to work and become self-sufficient understand the internet offers a tool to achieve these goals, job searches, online education opportunities to name the two most important ones. People not only will use the Web for socializing and entertainment, but it can assist in paying bills, getting medical advice, health care facilities are relying heavily on their telehealth programs to help ease the burden of patient care, and online learning leading to earning degrees The internet provides a better opportunity for the children living in public housing authorities to achieve success with their schoolwork thus it is an investment in their future. During this current time those households without internet that work from home have to go out from

the home to connect with work and vice versa without internet it hampers employers contacting their employees.

Response 3: Thank you for your comment. We have noted this need.

Comment 4: Could the City of Woodland Mills receive money from this grant?

Response 4: At this time we are only putting forth the plan for the use of funds. The full program guidelines and potential application periods have not yet been established.

Comment 5: I am happy to see this flexibility and believe this will enable efficient methods to get funding to help offset the impact of Covid on our rural communities.

Response 5: Thank you for your comment.

Comment 6: In today's society access to the internet has become an essential part of life. It's a tool that bring digital literacy to America. The sad part is that many of the residents in public housing cannot afford the cost or the Authority or have not installed the ability to have the internet connected. Making the internet accessible to Low-Income Public Housing residents is not a great thought but a necessary requirement in today's society. Authorities that want their residents to work and become self-sufficient understand the internet offers a tool to achieve these goals, job searches, online education opportunities to name the two most important ones. People not only will use the Web for socializing and entertainment, but it can assist in paying bills, getting medical advice, health care facilities are relying heavily on their telehealth programs to help ease the burden of patient care, and online learning leading to earning degrees. The internet provides a better opportunity for the children living in public housing authorities to achieve success with their schoolwork thus it is an investment in their future. During this current time those households without internet that work from home have to go out from the home to connect with work and vice versa without internet it hampers employers contacting their employees

Response 6: Thank you for your comment. We have noted this need.

Comment 7: While I am a strong proponent of expanding and improving broadband quality and access in rural, underserved areas, there is an ever increasing need for housing assistance. COVID 19 impacts on the housing sector will not be felt until the end of the year but they will be massive and the rate of foreclosures will drastically increase. There is need for funds to be directed into housing.

Response 7: Thank you for your comment. We have noted this need. We recognize that the needs that are resulting from the COVID-19 pandemic are much greater than the funding we have available. The proposed plan was developed after consideration of funding needs, other funding sources, and the capacity to administer the CDBG-CV funds.

Comment 8: How will the broadband grants be distributed and to who? Will it be to providers or governmental entities? Also, when will submissions be taken.

Response 8: At this time we are only putting forth the plan for the use of funds. The full program guidelines and potential application periods have not yet been established.

Comment 9: Cumberland County currently has a grant for a waterline extension. Will we be eligible or is that known yet?

Response 9: Local governments and organizations who are current recipients of regular round or CDBG-NDR funds will not be excluded from receiving CDBG-CV funds.

Comment 10: Would the UCDD be eligible under the public services category of CDBG-CV for our substance abuse program?

Response 10: At this time we are only putting forth the plan for the use of funds. The full program guidelines and potential application periods have not yet been established.

Comment 11: I am saddened and disagree greatly with the agencies specifically excluding affordable housing & fair housing efforts from this funding opportunity. The agencies are leaving out a vulnerable population in need of assistance - low income & moderate income homeowners & renters who were

furloughed, terminated, or lost their business, etc. because of the pandemic and the State's (necessary) response of closing businesses. Tennesseans lost valuable income resources from this - some permanently, while others lost money they can never make up. A lot of them fell behind in mortgage payments, utilities, and other monthly bills. Even though the due dates on these have been pushed back, it still becomes due - either at a higher monthly payment to pay back over time or due all at once. These families are not prepared or may not even understand these items will become due eventually. Affordable housing nonprofits do more than "create affordable housing." They counsel families in times of crisis to not lose their homes, budgeting when money is tight, or they simply help people understand the terms of an agreement, credit training when people do miss payments so they are not left without the ability to buy or rent because of missed payments. A secondary issue is that when these affordable housing home owners and renters are left out of receiving aid, that these homes will be lost to nonlocal investors and made into nonaffordable housing, which limits the housing markets. HUD sees value in affordable housing, and TN agencies should, too. Please reconsider and do not specifically exclude these Tennessee families and valuable nonprofit resource agencies. Sarah Halcott Creative Compassion, Inc.

Response 11: Thank you for your comment. Determining the use of these funds was a challenging process where considerations included, needs, experience, capacity, and what was felt could be accomplished with the amount of funding received and other sources of funding available. CDBG is one of three HUD programs receiving CV funds, ESG and HOPWA being the other two. Both of these programs have a specific and direct housing focus, while CDBG must also consider other needs and priorities of communities.

Comment 12: The Fahe TN Caucus appreciates the Tennessee Department of Economic and Community Development and Tennessee Housing Development Agency providing the opportunity to submit comments for the Amended 2019-2020 Annual Action Plan.

The Amendment identifies spending the CARES Act funding allocations for CDBG-CV1 of \$16,813,334. CDBG CV-1 is for non-entitlement units of local governments and will be invested in:

1. Revitalize disinvested areas & Improve livability \$2,000,000 (public,community infrastructure)
2. Business Support and TA \$1,972,667 (resource CDFIs/non-profits to provide TA to recover)
3. Public Services Addressing CV Impacts \$2,000,000
4. Broadband Expansion & Internet Access \$10,000,000 (expand to accommodate work-from-home, remote learning, social distance; Infrastructure \$6M, PHA \$2M, Technology Banks \$2M)
5. TN CED Admin, approx. 5% \$840,667

On behalf of the Fahe TN Fahe Caucus of 16 TN nonprofit Members and our shared work in central and northeast Tennessee in our Appalachian counties, please consider our comments to the proposed amendment below:

- 1) CDBG regulations allow for funding to be used in the Housing program area and would be an appropriate activity for addressing direct impacts of COVID-19 particularly with rehab assistance for homeowners who may be able to pay their mortgage but cannot afford needed improvements or

repairs. The request would be to allocate additional funds for housing activity. With the relationship between affordable housing non-profits and local governments, the existing partnerships would enhance housing activity as a COVID-19 response and the Tennessee CED has experience in housing rehab projects.

2) CDBG Housing Program Area is an effective resource for both homeowners and renters for new construction and rehabilitation activities and should be considered as priorities for the preservation of multi-family housing units, particularly those with rental assistance that may have had maintenance or operational activities negatively impacted by COVID-19.

3) For CDBG applications, applying for funding in different program areas would allow flexibility to meet our citizens' need. We would ask that any threshold factors be reviewed and modified as it is not addressed in the Amendment. For rural communities, water and sewer projects are very important to local governments that may also need to address housing needs for their citizens and recent housing needs assessments document the substandard housing that exists in particular in rural communities. As there are additional CDBG-CV funds available in program areas as a response to COVID-19, it would benefit communities that have high priority needs to apply in more than one program area.

4) With HUD lifting the cap for CDBG in the public services program area during the COVID-19 pandemic, CDBG Public Services program area eligible uses includes housing payments for three consecutive months on behalf of individuals and families to prevent potential homelessness which would include rent, mortgage and utility payments to prevent disrupted service or eviction. The TN Caucus will be interested to partner with local governments to assist in the delivery of housing assistance. The TN nonprofits also provide services that would qualify under public services such as food banks and food pantries, feeding programs, health related services. The expanded use of this program area is appreciated. With housing non-profits' relationships with local governments, there is an opportunity to utilize these funds in a targeted manner for lower-income and most at-risk families with housing assistance resources that can assist families to keep their affordable housing – be it rental or homeownership. These lower income families are most likely to suffer income disruptions during COVID-19 and the opportunity to assist those families with rent or mortgage assistance could be invaluable to the housing situation of those families. Local Governments working with housing providers could assure the compliance of providing the assistance to those households that are in need as a method of foreclosure prevention. It is important to understand that any match for applicants during this time when every community has lost substantial tax revenue; match would be difficult if not impossible. Thank you for your consideration of our comments. It is much appreciated that Tennessee has the proposed Amended Action Plan out for comment as it is important to have the CV funds available, and other CARES Act funding, for the citizens of our State that need assistance particularly during the effects of the COVID-19 pandemic. Sincerely, Lindy Turner, Chair Fahe TN Caucus

Response 12: Thank you for your comment. Determining the use of these funds was a challenging process where considerations included, needs, experience, capacity, and what was felt could be accomplished with the amount of funding received and other sources of funding available. The scoring factors related to program applications have not yet been determined, and they will be made available for potential applicants to review once the application round opens. We are also aware of the financial

burden facing many local governments and non-profit organizations, and this will be taken into consideration when determining if a program should require a match or not.

Comment 13: While all of the proposed funding uses are noble and needed, it is critical that the State addresses housing issues related to COVID-19. For the 11% of the workforce currently unemployed, a housing expense, whether it is rent, a mortgage, or needed repairs, is their largest bill that they have to find a way to pay while on reduced income. This impacts not only the homeowner or renter, but landlords, contractors, builders, mortgagors and lenders throughout the state, many of whom depend on these payments and investments to keep flowing. Stabilizing the housing market is critical to ensure that housing remains affordable beyond the current crisis. To maximize the impact of the federal funding on stabilizing the Tennessee economy and helping those most effected by COVID-19 and its economic impact, investment should go to home repair, emergency mortgage and rental assistance, and new construction of affordable homes, allowing the housing market to keep moving forward and helping small contractors and landlords, as well as unemployed households, the lifeline they need to weather this crisis.

Response 13: Thank you for your comment. Determining the use of these funds was a challenging process where considerations included, needs, experience, capacity, and what was felt could be accomplished with the amount of funding received and other sources of funding available. CDBG is one of three HUD programs receiving CV funds, ESG and HOPWA being the other two. Both of these programs have a specific and direct housing focus, while CDBG must also consider other needs and priorities of communities.

Comment 14:

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