



# Consolidated Annual Performance Evaluation Report (CAPER) PY23/FY24

# (JULY 1, 2023 – JUNE 30, 2024)

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### **CR-05** - Goals and Outcomes

# Progress the jurisdiction has made in carrying out its strategic plan and its action plan. 91.520(a)

This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.

The City of Memphis Program Year 2023 (Fiscal Year 2024) Consolidated Annual Performance and Evaluation Report (CAPER) details the Division of Housing and Community Development's (HCD) progress in carrying out its Strategic Plan and Annual Action Plan between July 1, 2023 to June 30, 2024. Goals and projects funded through the Community Development Block Grant (CDBG), HOME Investment Partnership, the Emergency Shelter Grant (ESG) Program, and Housing Opportunities for Persons with AIDS (HOPWA) are reported for this period.

HCD provided down payment assistance to 17 Low- and Moderate-Income homebuyers with HOME Investment Partnership Program funds. The City of Memphis also provided down payment assistance to 34 additional homebuyers that earn over 80 percent of AMI using city funds. The City of Memphis offers multiple down payment assistance programs including: the Citywide DPA (CWDPA) program (available to households earning up to 80% of AMI); the citywide Homebuyer Incentive Program for households earning up to 200% of AMI that are purchasing homes in specifically designated areas; and the Homebuyer Incentive Programs for teachers, fire and police that have no income limit.

In addition, 35 households were supported through \$154,072 of COVID-19 Housing Assistance Program (CHAP) funding. CHAP provides rental and mortgage assistance to low-income households who've experienced wage loss as a result on the Covid-19 pandemic and cannot afford to pay their rent or mortgage because of it. One household received mortgage assistance and 34 received rental assistance, serving a total of 86 individuals.

There are 8 designated Community Housing Development Organizations (CHDOs). During PY23 they acquired, constructed and rehabilitated homes for homebuyers and renters. There are currently 10 multifamily units being rehabilitated – these will be affordable senior housing including wraparound services. There is 1 additional rehabbed single-family home, and 9 new single-family homes being constructed. 8 of the new construction single-family homes and all multifamily units are still underway. The 2 completed single-family homes are not yet occupied but are listed for-sale. In addition to CHDO projects, the Affordable Homebuild Partnership Program is supporting the rehabilitation/preservation of 208 existing affordable multifamily rental units which are underway.

In PY23/FY24, HCD provided Emergency Solutions Grant funding to 7 agencies and served 1,414 people – 672 adults (Age 18 or Over), and 471 children (Under Age 18), with a total of 654 adult head of households. Of these 1,414 people, 132 were chronically homeless persons, 180 youth under 25 and 16 parenting youth under 25. A total of 416 households were served in Emergency Overnight Shelter, comprising 1,143 persons. In addition, 54 persons were served through the Street Outreach program and Permanent Housing/Rapid Re-housing was provided to 58 persons from 32 households. The homeless prevention program served 153 households. HOPWA assisted 400 persons through: Short-Term Rent, Mortgage, and Utility Assistance (N=198 individuals); Tenant Based Rental Assistance (N=148 individuals); Permanent Facility-Based Housing (N=12 individuals); Transitional/ Short-Term Housing

(N=42 individuals); and Supportive Services (N = 700 individuals).

CDBG funds supported public facilities and services, as well as homelessness prevention activities – serving a total of 8,614 persons. CDBG also funded internship programs, housing preservation, technical assistance, and the development of neighborhood plans.

# Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)

Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs, and percentage completed for each of the grantee's program year goals.

Goal	Category	Funding	Indicator	Unit of Measu re	Expecte d – Program Plan	Actual – Progra m Plan	Percen t Compl ete
Affordable Housing Preservation	Affordable Housing	CDBG HOME	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	House hold assiste d	550	0	0%
			Homeowner Housing Rehabilitated	House hold Housin g Unit	38	74	195%
Create Opportunities for Self Sufficiency	Homeless Non- Homeless Special Needs Non- Housing Communit Y Developm ent	CDBG	Public service activities other than Low/Moderate Income Housing Benefit	Person s Assiste d	6,871	4,200	61%

### Table 1 - Accomplishments – Program Year

Economic Development	Non- Housing Communit Y Developm ent	CDBG	Jobs created/retaine d Businesses assisted	Jobs Busine sses Assiste d	50 24	343	686%
Neighborhood Revitalization	Non- Housing Communit Y Developm ent	CDBG	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Person s Assiste d	100	30,084	30,084 %
		CDBG HOME	Public service activities for Low/Moderate Income Housing Benefit	House holds Assiste d	300	360	120%
New Affordable Housing Opportunities	Affordable Housing		Rental units constructed	House hold Housin g Unit	18	41	228%
			Homeowner Housing Added	House hold Housin g Unit	8	10	125%
			Direct Financial Assistance to Homebuyers	House holds Assiste d	28	17	61%

Provide Housing for Special Needs	Non-	CDBG HOPWA	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Person s Assiste d	90	0	0%
Populations	Homeless Special Needs		Public service activities other than Low/Moderate Income Housing Benefit	Person s assiste d	1,224	1,444	118%
			Tenant-based rental assistance / Rapid Rehousing	House holds Assiste d	165	148	90%
			Homelessness Prevention	Person s Assiste d	275	198	72%
			HIV/AIDS Housing Operations	House hold Housin g Unit	16	54	338%
Provide Support to Homeless		CDBG	Public service activities other than Low/Moderate Income Housing Benefit	Person s Assiste d	48	105	219%
Populations	Homeless		Public service activities for Low/Moderate	House hold assiste d	2,400	2,307	96%

Income Housing				
-				
Benefit				
Tenant-based	House	329	104	32%
rental assistance	holds			
/ Rapid	Assiste			
Rehousing	d			
Homeless	Person	941	1,569	167%
Person	S			
Overnight	Assiste			
Shelter	d			
Homelessness	Person	16	153	956%
		10	155	55070
Prevention	S			
	Assiste			
	d			
Other	Other	19	0	0%

### Table 2 - Accomplishments –Strategic Plan to Date

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expecte d – Strategi c Plan	Actual – Strate gic Plan	Percent Complet e
		CDBG: \$1,000,000	Rental units rehabilitated	Househol d Housing Unit	20	46	230%
Affordabl e Housing Preservati on	Affordable Housing	+OME \$1,722,177	Homeowner Housing Rehabilitated	Househol d Housing Unit	150	273	182%

Create Opportuni ties for Self	Homeless Non- CDBG: Homeless \$1,500,000 Special Needs Non- Housing	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	18,500	52,995	286%	
Sufficienc y Developme nt		Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1,850	12,076	653%	
			Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	2,500	4,501	180%
Economic Developm ent	Non- Housing Community Developme	CDBG: \$2,000,000	Facade treatment/busi ness building rehabilitation	Business	5	2	40%
	nt		Jobs created/retaine d	Jobs	200	405	203%
			Businesses assisted	Businesse s Assisted	25	8	32%
			Public Facility or Infrastructure Activities other than Low/Moderate	Persons Assisted	2,500	6,113	245%

Neighbor hood Revitalizat ion	Non- Housing Community Developme nt	CDBG: \$1,500,000	Income Housing Benefit Other	Other	200	0	0
			Public service activities for Low/Moderate Income Housing Benefit	Househol ds Assisted	1,500	7,896	526%
New	Affordable	CDBG \$575,800	Rental units constructed	Househol d Housing Unit	145	192	132%
Affordabl e Housing Opportuni ties	Housing	HOME \$1,722,177	Homeowner Housing Added	Househol d Housing Unit	25	55	220%
			Direct Financial Assistance to Homebuyers	Househol ds Assisted	170	204	120%
			Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	600	8356	1,392.67 %
Provide Housing for Special Needs	Non- Homeless Special Needs	CDBG \$350,000 HOPWA	Public service activities for Low/Moderate Income Housing Benefit	Househol ds Assisted	1,300	10,280	791%

Populatio ns		\$3,532,093	Tenant-based rental assistance / Rapid Rehousing	Househol ds Assisted	980	1,165	119%
			Homelessness Prevention	Persons Assisted	1,975	3,027	153%
			HIV/AIDS Housing Operations	Househol d Housing Unit	230	463	201%
			Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	950	4,088	430%
Provide Support	Homeless	CDBG \$1,075,000 ESG \$558,874	Public service activities for Low/Moderate Income Housing Benefit	Househol ds Assisted	47,000	52,340	111%
to homeless Populatio n		,55,67 <del>4</del>	Tenant-based rental assistance / Rapid Rehousing	Househol ds Assisted	8,325	667	8%
			Homeless Person Overnight Shelter	Persons Assisted	520	4,165	801%
			Homelessness Prevention	Persons Assisted	685	5607	819%
			Other	Other	215	0	0

# Assess how the jurisdiction's use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan, giving special attention to the highest priority activities identified.

The City of Memphis used CDBG funding for housing redevelopment in partnership with Habitat for Humanity to assist 24 senior citizens to repair roofs in conjunction with the Aging in Place initiative, and to provide match funding to Shelby County Housing's Lead Hazard Reduction Program for necessary home repairs on 50 units not covered by regular program funding. The combination of these efforts resulted in nearly double the number of homeowner housing units rehabilitated compared to the goal. In addition, HOME funding disbursed to CHDO's and nonprofits resulted in the addition of 51 homeowner and rental units constructed. While the HOME funded DPA program served less low-income households than planned, the amount of down payment assistance provided increased, providing 10% of the purchase price up to \$25K – allowing these households more housing choice than under the previous funding maximum of \$10K.

CDBG funds were also used to support the renovations of Riverview Community Center and Pine Hill pool. Two other strategic initiatives supported by CDBG funds include the substantial rehabilitation of Cossitt Library downtown, and the redevelopment of Historic Melrose High School in Orange Mound. Phase I of this project, which is complete, includes a public library and genealogy center – providing this community with its first public library. Phase II which is still in the planning phase will include 68 units of affordable senior rental housing on the upper floors of the building. These redevelopment projects allowed increased access to public services for over 30,000 residents of low- to moderate- income neighborhoods.

HOME and HOPWA funds were used to provide Tenant Based Rental Assistance to homeless and special needs populations. The City also put CDBG and HOPWA funding to work by supporting public services that respond to the needs of the elderly, youth, persons living with HIV/AIDS, victims of domestic violence, employment and training opportunities, legal advocacy for immigrants and other services for special needs populations. HCD also utilized CDBG and HOME-ARP funds for a variety of activities that provided needed services to homeless individuals and families, including a housing referral hotline, expanding an intake assessment and referral services for homeless families.

# CR-10 - Racial and Ethnic composition of families assisted

Describe the families assisted (including the racial and ethnic status of families assisted). 91.520(a)

	CDBG	HOME	ESG	HOPWA
Race:				
White	2,819	8	88	19
Black or African American	8,475	32	1,287	380
Asian	7	0	4	0
American Indian or American Native	6	0	2	0
Native Hawaiian or Other Pacific Islander	3	0	1	0
Total	11,310	40	1,414	400
Ethnicity:				
Hispanic	199	0	9	0
Not Hispanic	11,111	0	1,405	1

Table 3 – Table of assistance to racial and ethnic populations by source of funds

### Narrative

In PY 2023/FY 2024, activities implemented with CDBG funds benefitted 11,336 people, including people that identified as other or multiple race. These numbers do not take into account the area benefit activities which are for activities that benefit an entire neighborhood. The numbers for activities with area benefit national objectives are pulled from census tract data for the neighborhood in which the particular CDBG activity provides services – representing 30,204 additional people.

Some of the activities funded by CBDG funds include an internship program, which served 99 students from local colleges and university including the University of Memphis, LeMoyne-Owen College, Christian Brothers University, and Rhodes College to work at agencies throughout the city. CDBG also funded the Fair Housing program through Memphis Area Legal Services (MALS) that supported 360 people. Some of their activities included New and Closed Landlord Tenant Cases, and New and Closed Fair Housing Cases. Other public and supportive service activities supported over 7,951 people in the city. Additionally, the HOME program benefited 40 people, while the ESG and HOPWA supported 1,414 and 400 people respectively.

# CR-15 - Resources and Investments 91.520(a)

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public – federal	25,321,238	14,383,853
HOME	public – federal	16,270,922	336,578
HOPWA	public – federal	4,826,184	3,627,794
ESG	public – federal	837,575	630,385

#### Identify the resources made available

Table 4 - Resources Made Available

### Narrative

The above listed resources made available include sources available for PY23/FY24, as well as unspent funds from previous funding years. During PY23, \$14,383,853 in CDBG funds were expended – including \$6,437,795 from FY24 and \$7,946,058 from previous program years. Beginning with PY24/FY25, identified unspent funds will be rolled over into current spending years to allow for additional project implementation, as well as more up to date reporting and accomplishment data. HCD planning administration and finance teams will proactively and regularly track internal department and external grantee spending compared with proposed budgets to allow for precise budget allocation planning for the Annual Action Plan and Consolidated Plans in future years. These internal process changes will ensure efficiency in budget allocations and grantee/subgrantee spending in order to maximize the impact of all entitlement funds received.

Target Area	Planned	Actual	Narrative Description
	Percentage of Allocation	Percentage of	
	of Anocation	Allocation	
Cordova	0	2	
Core City	10	8	Cossitt Library
East	2	2	
Frayser	10	5	
Jackson	7	4	
Lamar	10	12	Historic Melrose high school
Mid City	10	9	
Oakhaven & Parkway		4	
Village	6		
Raleigh	10	5	
Southeast	6	5	
Westwood	6	7	Riverview Community Center
Whitehaven	8	8	

#### Identify the geographic distribution and location of investments

North	6	9	
		17	Pine Hill Pool; Riverview Community
South	9		Center
Orange Mound	10	12	Historic Melrose high school

Table 5 – Identify the geographic distribution and location of investments

#### Narrative

As most areas of the city are low- and moderate-income areas per HUD definition (51% or more of people within an area have incomes 80% or below the Median Family Income), HCD's programs operated mainly on a citywide basis to serve low- and moderate-income persons.

The three areas with particularly high distributions of investment are due to larger scale investment projects that utilized CDBG funds: Historic Melrose High School in Orange Mound (Lamar), and Riverview Community Center and Pine Hill Pool in South Memphis.

HCD collects, analyzes and monitors data to identify underserved areas and uses Geographic Information Systems (GIS) to map existing conditions and to track progress made in targeted areas. HCD also targets neighborhoods on the basis of the following criteria: Location, Amount of investment, Proximity to other investment, and Ability to sustain and leverage City/Federal investment.

#### Leveraging

Explain how federal funds leveraged additional resources (private, state and local funds), including a description of how matching requirements were satisfied, as well as how any publicly owned land or property located within the jurisdiction that were used to address the needs identified in the plan.

HCD utilizes the City's Federal entitlement dollars to maximize the impact of its housing and community development programs. HCD partners include other government agencies, private foundations, non-profit service providers, mortgage companies, lenders, and private investors. The collaboration with our partners strengthens HCD's ability to provide services. The efforts to leverage entitlement and other funds with private and public resources are described below.

Housing departments match and leverage funds by providing funding to for-profit and non-profit housing developers to rehabilitate or construct single and multi-family housing units. CHDO projects matched HOME funds with \$1,755,080 in PY 23 – note that all but two of these projects are still underway. In addition, the HCD Homeless and Special Needs Department requires match and leverage from organizations awarded funds through its competitive grant programs.

In addition to federal match requirements, the City leveraged funding from the Memphis Affordable Housing Trust Fund (MAHTF) for various affordable housing development projects. In PY2023, 20 units of permanent supportive housing for veterans and 11 owner-occupied single-family home repairs were completed utilizing \$1.1M from the MAHTF. An additional 186 units of affordable multifamily rental housing are underway funded by \$6.6M in leveraged MAHTF dollars. These funds include local government issued Bonds and General Fund obligations from City Council. ARPA funding provided owner-occupied rehab and repair to 74 single-family homeowners in PY2023, with another 71 in progress. Three new construction homes were also built with ARPA funding, with another 46 underway. Completed PY2023 ARPA projects represent \$1.7M in leveraged funding.

Publicly owned land or property within the jurisdiction is regularly used for affordable housing or economic development projects. The city provided the Tillman Cove property in Binghampton for the ground of rebuild of the previously dilapidated rental housing. This project opened this year and is now 219 units of high quality, affordable housing.

Fiscal Year Summary – HOME Match					
1. Excess match from prior Federal fiscal year	650,237.00				
2. Match contributed during current Federal					
fiscal year	1,755,080.00				
3. Total match available for current Federal fiscal					
year (Line 1 plus Line 2)	2,405,317.00				
4. Match liability for current Federal fiscal year	12,324.68				
5. Excess match carried over to next Federal fiscal					
year (Line 3 minus Line 4)	2,392,992.32				

Table 6 – Fiscal Year Summary - HOME Match Report

Match Cor	Match Contribution for the Federal Fiscal Year							
Project No. or Other ID	Date of Contribut ion	Cash (non- Federal sources)	Forego ne Taxes, Fees, Charge s	Appraised Land/Real Property	Required Infrastruc ture	Site Preparati on, Construct ion Materials , Donated labor	Bond Financing	Total Match
CHDO	06/30/2	1,755,08						1,755,08
Projects	024	0	0	0	0	0	0	0

Table 7 – Match Contribution for the Federal Fiscal Year

### **HOME MBE/WBE report**

Program Income – Enter the program amounts for the reporting period					
Balance on hand at beginning of reporting period \$	Amount received during reporting period \$	Total amount expended during reporting period \$	Amount expended for TBRA \$	Balance on hand at end of reporting period \$	
390,803.96	314,810.04	173,324.95	126,679.12	141,485.45	

Table 8 – Program Income

Minority Business Enterprises and Women Business Enterprises – Indicate the number and dollar value

of contracts for HOME projects completed during the reporting period

	Total	I	<b>Minority Busin</b>	ess Enterprises		White Non-
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non- Hispanic	Hispanic	Hispanic
Contracts:						
Number				6		
Dollar	1,980,000			1,980,000		
Amount						
Sub-Contract	s:					
Number						
Dollar						
Amount						

	Total	Women Business Enterprises	Male
Contracts:			
Number			6
Dollar Amount			1,980,000
Sub-Contracts:			
Number			
Dollar Amount			

Table 9 - Minority Business and Women Business Enterprises

**Minority Owners of Rental Property** – Indicate the number of HOME assisted rental property owners and the total amount of HOME funds in these rental properties assisted

	Total	Minority Property Owners				White Non-
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non- Hispanic	Hispanic	Hispanic
Number						

Dollar			
Amount			

#### Table 10 – Minority Owners of Rental Property

**Relocation and Real Property Acquisition** – Indicate the number of persons displaced, the cost of relocation payments, the number of parcels acquired, and the cost of acquisition

	Number	Cost
Parcels Acquired	0	0
Businesses Displaced	0	0
Nonprofit Organizations Displaced	0	0
Households Temporarily		
Relocated, not Displaced	0	0

Households	Total	Minority Business Enterprises				White Non-
Displaced		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non- Hispanic	Hispanic	Hispanic
Number	0	0	0	0	0	0
Cost	0	0	0	0	0	0

Table 11 – Relocation and Real Property Acquisition

# CR-20 - Affordable Housing 91.520(b)

Evaluation of the jurisdiction's progress in providing affordable housing, including the number and types of families served, the number of extremely low-income, low-income, moderate-income, and middle-income persons served.

Number of Households to be supported	One-Year Goal	Actual
Homeless	46	104
Non-Homeless	72	74
Special-Needs	196	308
Total	314	486

Table 12 - Number of Households

Number of households supported through:	One-Year Goal	Actual
Rental Assistance	242	380
The Production of New Units	34	51
Rehab of Existing Units	34	74
Acquisition of Existing Units	4	0
Total	314	505

Table 13 – Number of Households Supported

# Discuss the difference between goals and outcomes and problems encountered in meeting these goals.

The City of Memphis Division of Housing and Community Development (HCD) provided affordable housing units to the homeless population as well as the special needs households. HCD also supported owner-occupied repair of 74 low-income and senior housing units in order to preserve the quality of existing housing conditions for vulnerable populations. Senior repairs were completed in partnership with Habitat for Humanity's Aging in Place Program. A partnership providing CDBG match funding to Shelby County Housing's Lead program covered necessary home repairs that are not covered by LHRG funds.

Further, HCD exceeded its goal in the production of new affordable housing units through the Affordable Homebuild Partnership and CHDO Programs, exceeding its overall goal and producing 51 units. Any acquisition of units is usually combined with substantial rehabilitation or new construction and is reflected under that goal.

HCD exceeded its goals in providing housing support to the homeless and special need populations. HCD achieved these goals through the ESG, HOPWA, HOME-ARP and HOME TBRA programs that provided rapid-rehousing housing to 32 homeless households and rental assistance to 380 households. In addition, but not included above, HCD provided rental and mortgage assistance to 35 households in partnership with United Housing, Inc utilizing CHAP funding.

### Discuss how these outcomes will impact future annual action plans.

The City of Memphis met and exceeded its goals in three of the areas including rehabilitation and production of affordable housing, as well as providing rental assistance. To continue achieving our goals, HCD will sustain relationships with local nonprofits, government agencies, the local utility company, and philanthropic organizations to support new construction and rehabilitation of housing units, as well as maintain quality and affordability through owner-occupied home repairs, energy-efficiency improvements, and accessibility modifications. These program leverages resources, braid funding, and ensures that eligible homeowners and homebuyers receive improvements that make their homes more accessible and energy efficient. HCD also administers a weatherization program through funding from the Department of Energy, and is working to find additional funding that will reduce deferrals by offering critic home repairs that are not eligible with current program funding.

Under the new Mayoral administration HCD is partnering with other government divisions, non-profit and for-profit developers, and additional stakeholder agencies to address barriers to affordable and attainable housing production that were outlined in the 2022 Memphis and Shelby County Joint Housing Policy Plan. This initiative is focused on land activation, creative financing, and reducing infrastructure and regulatory barriers to address Memphis quality housing shortage. Actions from this initiative will increase the production of affordable housing in future program years.

In recent years, the City has broadened its efforts to market the down payment assistance program and is leveraging city funds to attract middle-income households to purchase homes in the core of the city as well. This is in addition to the HOME funded program for low and moderate-income homebuyers. Program guidelines have been adjusted to increase the down payment assistance maximum (10%) from \$10K to \$25K per homebuyer. The City has dedicated additional money in FY2025 to the Teacher Homebuyer Incentive Program to attract quality educators to Memphis Shelby County Schools and allow them to live within the City.

Include the number of extremely low-income, low-income, and moderate-income persons served by each activity where information on income by family size is required to determine the eligibility of the activity.

Number of Households Served	CDBG Actual	HOME Actual
Extremely Low-income	5,363	177
Low-income	246	34
Moderate-income	185	0
Total	5,794	211

Table 14– Number of Households Served

#### Narrative

The table above reflects income data for households that received direct housing assistance or public services for housing benefit through CDBG and HOME funding. HOME funding provided housing services

including HOME TBRA rental assistance and down payment assistance to increase homeownership opportunities. CDBG funding provided supportive services related to housing and creating opportunities for self-sufficiency through partner agencies including Hope House, Friends for All, MIFA and Generous Life. As previously mentioned, Aging in Place provides owner-occupied repairs to extremely low-income seniors, allowing them to remain in their homes long-term. Funding for additional home repair was provided to households with young children experiencing lead hazards. And lastly, Memphis Area Legal Services provides services to address Landlord-Tenant disputes and Fair Housing discrimination.

# CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)

Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through:

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

The community's outreach and engagement approach includes a 24-hour Hotline for homeless families, as well as a "no wrong door" approach for the Coordinated Entry System (CES), equipping all CAFTH community partners with the ability to enter the unhoused into the CES via HMIS. From April to June of 2024, the hotline screened 1,248 calls, averaging 416 calls a month. Those who do not meet HUD's definition of literally homeless receive mediation and other prevention services. Through Rapid Rehousing efforts, our community has housed many families and individuals. Fifty-six (56) households representing 56 adults and 177 children were permanently housed through Catholic Charities of West Tennessee (CCWTN) and Memphis Inter-Faith Association (MIFA) rapid rehousing programs for families last year.

The Coordinated Entry System for adults, veterans, families, and youth (18-24) operates under a "no wrong door" approach, with two primary walk-in centers, two primary outreach providers, and a total of 22 participating agencies, including mental health providers and a hospital system. During FY24, a total of 1,496 households, 551 single adults, and 942 families were assessed for housing needs through the Coordinated Entry System overseen by the CoC Lead Agency, Community Alliance for the Homeless (CAFTH). The Coordinated Entry process utilizes the Vulnerability Index - Service Prioritization Decision Assistance Tool (VI-SPDAT) to assess individuals.

The Point in Time (PIT) Count was conducted in person on January 25, 2024. Over 100 volunteers collaborated with the Lead Agency to conduct the overnight count of unsheltered persons experiencing homelessness. Area shelters submitted data via the HMIS system to obtain an accurate count of sheltered persons. This outreach event provided an opportunity for extensive city- and county-wide outreach to people experiencing homelessness. This past year, the PIT count was also paired with a large outreach event called 901 Counts. This community-wide resource fair allowed hundreds of individuals and families experiencing homelessness to access services such as SNAP, medical assessments and testing, food, housing assessments and potential placement, and much more.

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

Memphis/Shelby County has approximately 941 emergency shelter beds, including additional beds allocated for seasonal and overflow purposes. There are 428 transitional housing beds, a decrease from previous years, as many transitional housing units were reclassified in 2021 as other permanent housing beds, which more accurately reflects how some of the community's previously transitional housing beds are currently being utilized.

The Salvation Army operates a 132-bed facility for female-identified individuals. The Hospitality Hub has also operated a barrier-free shelter for women and children. The Hospitality Hub continues to serve as a centralized point of entry for individuals experiencing homelessness in Memphis, along with Catholic Charities of West Tennessee's Outreach Center. For unaccompanied youth, three Joint Transitional-Rapid Re-Housing programs have been operating through the Youth Homelessness Demonstration Project (YHDP) funding. Additionally, there are other projects funded through YHDP that include youth system navigation, short-term stays through a host homes program, and extensive youth-focused case management. For individuals and families fleeing domestic violence (DV), two new DV-specific Joint Transitional Housing- Rapid Rehousing programs were started. Each program can provide up to two years of housing assistance in either transitional housing, rapid rehousing, or a combination of both components.

Community Alliance for the Homeless operates a non-congregate emergency shelter program that provides short-term stays in hotels for 568 individuals (318 children, 65 youth aged 18-24, 185 adults over 25 years old) for a total of 2,748 nights from July 2023-June 2024.

Last year, 536 clients were assessed through street outreach efforts and placed in our CoC's Coordinated Entry System to be permanently housed. Our community's system performance measures indicate that in the last year, successful exits from emergency shelters increased by 4%. We have successfully reduced the length of stay in emergency shelter by 46% over the last seven years.

The CoC continues to partner with OUTMemphis to address the needs of the LGBTQ+ community. OUTMemphis has been awarded Continuum of Care and Youth Homelessness Demonstration program grants from HUD to provide short-term housing assistance through Joint TH-RRH and RRH only projects. They operate these programs through the Metamorphosis Project, their response to LGBTQ+ youth homelessness in Memphis. This project has been evolving for years and has multiple pieces that work simultaneously to address the various needs of young LGBTQ+ people without stable housing and resources. The Youth Empowerment Center hosts Memphis' only youth specific drop-in center as well as the city's only LGBTQ+ youth-specific emergency shelter. The building is the hub for the Youth Emergency Services (YES) Program, providing food, clothes, hygiene supplies, and many other services for years. The Joint TH- RRH component provides homeless youth a bridge to move from emergency shelter and transitional housing to living independently. This project allows OUTMemphis the space to provide support to one of our most vulnerable populations: LGBTQ+ 18-24-year-olds living on the streets.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: likely to become homeless after 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); and, receiving assistance from public or private agencies that

#### address housing, health, social services, employment, education, or youth needs

Catholic Charities of West TN (CCWTN) provides rapid re-housing activity services through its Genesis Homeless Services program and Youth Homeless Demonstration program. These programs place clients in safe and stable housing and provide short to medium term rental assistance and supportive services or linkage to appropriate resources. CCWTN also serves Veterans who are ineligible for VA-sponsored programs but are experiencing homelessness and living with a mental illness. Supportive services can include case management, transportation, employment, SSI/SSDI benefits, housing assistance, and placement, and assistance obtaining food, furniture, clothing, cell phones, and computer access. Referrals are made to the appropriate entities for medical and legal services, mental health counseling/treatment, documentation and identification, and vocational/employment assistance. Dedicated diversion resources offered include connecting people at risk of homelessness to emergency contacts or family members, landlord mitigation, and advocacy when needed.

To support agencies assisting low-income individuals and families who may be at risk of homelessness, the Lead Agency hosted 22 training sessions attended by over 1,000 service providers. Topics such as accessing mainstream benefits and housing vouchers were offered. Our CoC's system performance measures indicate that while our community did not see an increase in income last year, the income for people exiting to permanent housing is still higher than it has been in years past. Overall, 2,667 people were served through rapid rehousing programs in the CoC, receiving supportive services to stabilize housing and prevent future homelessness.

Community Alliance for the Homeless is a member of the Shelby County Re-Entry System Group (Formerly the Justice Network) and works on the housing subcommittee to assist with removing barriers when attempting to house justice involved individuals and families. CAFTH has also been working with the Department of Children's Services (DCS) to improve housing access after exiting foster care.

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

The CES is designed to ensure that all people experiencing a housing crisis have fair and equal access to the system with the goal of returning them to permanent housing as quickly as possible. Further, the CoC's goal through the 901 Home, Together: Strategic Plan to End Homelessness is to reduce and end homelessness by looking to other low-income and subsidized housing programs to help meet our goals. This includes continuing to partner with Memphis Housing Authority to create a preference for households experiencing homelessness. Through our Affordable Housing Initiative, we have developed a

protocol and engaged HUD-assisted multifamily property owners to educate them on the process of designating a homeless preference for their projects and helping coordinate how to manage this. We have developed an extensive low-barrier landlord list that is published weekly and sent to Consortium member service providers. CAFTH's Housing Navigation team and the Youth Housing Navigator work closely with case managers, service providers, and the CES to increase access to housing. Through the CoC's CES, CAFTH identifies people experiencing homelessness who meet eligibility criteria and provides low-income housing and support services. To date, the CoC has successfully issued and utilized 100% of Emergency Housing Vouchers, providing an equivalent of \$1.3 million in housing assistance.

MHA and the CoC have partnered to develop a Move-On strategy to increase the availability of housing. Through this partnership, designated Move-On vouchers have all been distributed at 100% utilization rate and working to obtain more vouchers in the future. Memphis/Shelby County currently has 1,000+ units of Permanent Supportive Housing (PSH) or Other Permanent Housing (OPH) dedicated to homeless individuals and families. PSH programs have demonstrated great success, maintaining a 90%+ retention rate or exit to permanent destinations over the past year. Many residents have been there for years. Some do not need or want the intensive services of PSH and would like to move into a more integrated setting, but face barriers finding affordable housing. Move-On allows participants to move into mainstream housing, creating more PSH opportunities for others waiting in the CES.

The US Department of Veterans Affairs awarded CCWTN funding to continue its RRH initiative under the Supportive Services for Veteran Families (SSVF) program. With CCWTN taking on the role of sole provider of SSVF, our Veteran community has benefitted from having a centralized point of access for RRH, which can collaborate with the VA Homeless Department. Families receiving RRH experience shorter homeless episodes than other families, and based on newly released research, also have lower rates of return to homelessness.

The youth-specific programs implemented by YHDP grants, including Joint Transitional and RRH, Youth System Navigation, Host Homes, and PSH, are about to start their third year of operation. New unaccompanied youth are connected to CES every day through the Youth System Navigators, and eligible youth have been referred to permanent housing designed to support 18-24 year-olds.

As housing costs continue to rise, many families who manage to exit homelessness struggle to maintain stable housing – resulting in a slight uptick (5%) in returns to homelessness last year. We will continue to provide training to local providers and advocate for continued funding for PSH and RRH. In 2023, the CoC was awarded over \$11M in federal funding to support PSH, RRH, and YHPD housing efforts in our community – representing our highest CoC/YHDP award to date and the most funding received in FY23 by any CoC in TN. The Lead Agency will continue to work on advocacy and education surrounding the barriers and challenges our community is facing as it relates to accessing and maintaining safe, affordable housing.

## CR-30 - Public Housing 91.220(h); 91.320(j)

### Actions taken to address the needs of public housing

HCD has been working with the Memphis Housing Authority (MHA) on the Choice Neighborhoods Implementation (CNI) Grant for South City, which includes revitalization of the City's last traditional public housing (PH) development – Foote Homes. Construction began in 2019, and Phases I-V are complete. Phases I-IV contained 512 total units, including 253 Project-Based Voucher (PBV) units and 73 Rental Assistance Demonstration (RAD) units. This development includes one, two, three and fourbedroom units. Phase V lease-up began in May of 2024, comprising 120 units for seniors. The final Phase 6 will contain 80 units.

MHA manages 1,298 conventional PH units. In late 2021, MHA and Knight Development, closed on the conversion of 472 units to PBVs under HUD's RAD Program (College Park- 341 units; Uptown single-family homes-106 units; and Askew Place-25 units). Residents that were relocated are in the process of returning to the newly completed units.

The conversion of an additional 206 PH units (Barry Towers and Jefferson Square) began in 2023, with Borda Towers and Venson Center to follow. These 4 high rise developments include 827 units. Redevelopment will include resident relocation, rehabilitation, and building upgrades. Each resident has the "Right to Return" to the development if relocated during rehabilitation. The RAD process allows MHA to seek both public and private funding to make needed repairs/improvements to existing units, allowing the housing stock to be preserved while adding additional amenities. Past rehabilitation projects were funded using Capital Funds, which required major repairs to be spread over a longer period (3-5 years) because the costs of repairs exceeded the allocation per unit subsidy given by HUD to operate the properties.

The Housing Choice Voucher (HCV) Program administers over 8,503 vouchers including regular choice mobility vouchers; competitively awarded/assigned PBVs; and a small number for the elderly, veterans and other specific populations. 570 PBVs are currently in use, with another 318 being added pending redevelopment. Approximately 386 "sunset" vouchers were issued to MHA for its South City CNI Grant for the relocation of residents during the construction of the six-phase project and will end after project completion.

MHA was awarded 72 Family Unification Program (FUP) vouchers to serve: 1) Families who, due to the lack of adequate housing, are in danger of losing their child to out-of-home care or are experiencing delays in the discharge of a child from out-of-home care, and 2) Foster youth between 18-24 years old. The latter is now Foster Youth to Independence (FYI) and has 25 separately allotted vouchers. MHA received 258 vouchers for the Mainstream Voucher Program to assist non-elderly persons with disabilities and their families. 25 Veterans Assistance Supportive Housing (VASH) vouchers were awarded for a total of 492 vouchers to assist homeless veterans and their families. MHA partnered with

CAFTH to utilize 198 Emergency Shelter Vouchers. Additional vouchers were issued for the RAD conversion of Askew/Uptown (26) and College Park (65). These vouchers help reduce homelessness and keep family units intact.

Elderly Designation renewed in 2023, limiting some PH units in Heritage Landing at Cleaborn Pointe, Fairway Manor, Latham Terrace, Legends Park North, Lyons Ridge, Magnolia Terrace and University Place to seniors 62 and older who may be disabled. Two new facilities at Legends Park and Foote Park @ South City are also being added for seniors 62 and older. Edgeview at Legends Park is comprised of 99 units, including 7 for Veterans.

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

The City, through the Memphis Housing Authority (MHA), works with USI (formerly Urban Strategies, Inc.) in coordinating and promoting programs that enhance the economic self-sufficiency of public housing residents. MHA also has informal and formal grievance procedures that provide for the disposition of resident complaints or grievances. MHA has a Resident Advisory Board (RAB) which meets with residents to receive input, suggestions, and concerns regarding public housing authority policies, operations, and management. The RAB meets monthly with Property Management staff and Directors of various departments to exchange information and work on solutions to identified problems.

Homeownership Program(s) at MHA:

The Housing Choice Voucher Program administers the SHAPE Program. This program allows for the conversion of a Rental Assistance Voucher to a Mortgage Assistance Voucher for 15 years. The Head of Household must be employed continuously for 1 year. The employment requirement is waived for a disabled family. To participate in the SHAPE Program, an applicant must complete a Qualified Homeownership Counseling Program and to that end, MHA is working towards becoming a HUD Certified Counseling Agency. This will better prepare the participants in both the Public and HCV Program to become homeowners.

The Legends Park HOPE VI Program included the homeownership phase; McKinley Park located within the South Memphis area immediately south of Askew Place. Formerly approved as a 30-unit development, HUD approved reducing the unit count to 23 and the active phase of development and homes sales ended in October 2018. Due to limited resources, MHA no longer administers this program. The remaining 7 vacant lots will be sold for future development furthering the opportunity for affordable homeownership.

The Public Housing Family Self-Sufficiency (FSS) Program also encourages homeownership, and a City of Memphis Down Payment Assistance Program has enabled several PH residents to purchase homes. Several Public Housing families have transitioned to homeownership using this Program and its escrow

ability. One program participant in the Public Housing Program is currently working on the financing needed to purchase her home.

### Actions taken to provide assistance to troubled PHAs

MHA was designated as a troubled PHA 2022, and that status was removed in 2023.

# CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j)

Actions taken 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. 91.220 (j); 91.320 (i)

The City works in partnership with different organizations to address bariers to affordable housing production within the City of Memphis. In 2022, HCD in partnership with Memphis and Shelby County Division of Planning and Development completed a Joint Housing Policy Plan to establish a set of policy and program recommendations that the County and City would need to adopt to support a healthy housing market that meets the need of all residents, supports healthy neighborhoods and creates prosperity for the community. The four identified objectives of the plan include (1) improving housing quality, (2) supporting homeownership, (3) diversifying housing stock, and (4) increasing quality low-income housing.

Under the new mayoral administration, a Housing Task Force cohort has been created to focus on three areas of the joint housing policy plan: land activation, financing, and regulatory barriers. The respective working groups for each focus area bring together experts and stakeholders from public, private and institutional sectors to collaborate and uncover barriers and find innovative methods to address them. This work is building upon an increase of cross sector and intergovernmental collaboration in recent years to implement the goals of the City's comprehensive plan, Memphis 3.0. The focus of this plan is to "build up, not out" by focusing growth around anchors within core neighborhoods. When City stakeholders and residents work together, this will create holistic, thriving neighborhoods through housing development, economic revitalization, and investment in community assets.

Additionally, in 2023, the Unified Development Code was updated to address barriers to housing development and diversifying the housing stock. The updates reduced the minimum lot size for Accessory Dwelling Units to now be built on 7,000 sq ft lots, as well as allowing "missing middle" housing by-right in more zoning districts. "Missing Middle" housing includes 2–6-unit multifamily housing types (duplexes, triplexes, townhomes and "large homes" - split into multiple smaller units). This type of housing allows for a buffer between single-family homes and large multifamily developments, as wells as offering an alternative and often more affordable housing choice for households that don't want a traditional single-family home.

HCD offers many programs to address barriers for both non-profit and for profit developers when developing affordable housing. The programs funded with federal entitlement HOME funding include the Affordable Homebuild and Rental Partnership Programs and the CHDO program. CDBG funding is applied toward specific projects when they are eligible. In addition, HCD administers the Memphis Affordable Housing Trust Fund to support affordable housing development including new construction and rehabilitation of multifamily projects and single-family homes, as well as owner-occupied repair to

preserve existing affordability and quality. HCD is working to create additional housing programs that address strategic housing needs identified through our extensive partnerships with development stakeholders and residents. Lastly, the City's DPA program has increased its maximum assistance up to \$25K per homeowner (max of 10% of purchase price), ensuring that low-moderate income homebuyers can find quality, affordable homes within the current housing market.

### Actions taken to address obstacles to meeting underserved needs. 91.220(k); 91.320(j)

The City of Memphis launched the Memphis Affordable Housing Trust Fund (MAHTF) in the fall of 2019 and began accepting applications and awarding funding for housing projects in December 2019. In Since then, the City has awarded nearly \$13M in leverage funding for over 500 units of affordable housing.

The City continues to work with its stakeholders to identify other funding opportunities and to leverage related efforts. A lack of quality affordable rental housing remains a challenge in Memphis. HCD has been increasing efforts to make for-profit and nonprofit developers aware of competitive grant programs available for the development of affordable single and multi-family housing and has successfully attracted several great projects aimed at low-income households, veterans, seniors and other underserved populations.

In addition, HCD is focused on holistic neighborhood redevelopment – tying economic development investments with housing development in the surrounding area to ensure multiple needs are addressed. An example of this is within the Orange Mound neighborhood. HCD used a combination of CDBG and other state and local funding for the redevelopment of Historic Melrose High School. Phase I of this project is officially open, including a library and genealogy center. The next phase will include affordable senior housing. In addition, the City of Memphis is engaged in a public-private partnership to create a Land Trust in the neighborhood to increase quality housing options while preserving affordability.

The City of Memphis also works closely with the Continuum of Care planning process conducted by the City's sub-contract agreement with the Community Alliance for the Homeless (CAFTH). CAFTH works closely with its partners in the planning process by ensuring there is input from the broader community, facilitating the preparation of the City's Continuum of Care application and updating the Needs Assessment for Homeless and Other Special Needs Populations. To address the needs of the homeless with mental illness and/or special needs, the City and its partners will increase outreach, expand supportive service options, and provide additional units to this population through TBRA and the construction of new units.

### Actions taken to reduce lead-based paint hazards. 91.220(k); 91.320(j)

The City of Memphis's Division of Housing and Community Development (HCD) Lead Hazard Reduction Grant (LHRG) program is a federally funded program from the Office of Lead Hazard Control and Healthy Homes (OLHCHH) aimed to reduce lead-based paint hazards and provide healthier home environments

in single and multi-family housing units that primarily house children under the age of six years. This is a coordinated effort between inter-governmental agencies that include the Shelby County Health Department (SCHD), the State of Tennessee Department of Environment and Conservation (TDEC), the Shelby County Housing Department (SCHD), and other local housing agencies.

The LHRD program completed and cleared approximately 27 lead-contaminated units during program year 2023 and utilized over \$215,640 in grant funds to reduce lead hazards and \$172,455 to perform healthy home interventions in 40 units for the City of Memphis and Shelby County. To increase the environmental contractor worker pool, the program plans to provide training resources and opportunities to build capacity for EPA Renovation, Repair and Paint (RRP) certifications, State of Tennessee Lead Abatement Worker Certifications, State of Tennessee Lead Abatement Supervisor Certifications.

The Shelby County Health Department (SCHD) provides free blood lead screening for children under age six years. In FY 2023, SCHD nurses screened 715 children living in high-risk communities. County wide, there were 4,910 children screened for lead exposure, with 1,954 children testing positive for elevated blood lead levels (elevated blood lead levels now include children with blood leads > 3.5 g/dl). The Memphis/Shelby County community continues to have a 1.6% lead poisoning rate – well above the national averages for lead-poisoned children. The SCHD gave Lead Education Presentations to 152 community groups, parents, and caregivers that reside at community centers, faith-based organizations, schools, health clinics and pediatrician offices, and health fairs. The SCHD Childhood Lead Poisoning Prevention Program also distributed 3,329 pamphlets and other literature discussing lead poisoning prevention, nutrition, and proper cleaning demonstrations to reduce lead paint dust hazards. LHRD has committed to taking a more active role in raising public awareness of lead-based paint hazards through the partnership developed with the SCHD.

LHRD continues to partner with the state and local agencies such as, the Tennessee Division of Environment and Conservation (TDEC), Memphis Housing Authority (MHA), Promise Development Corporation, and Green and Healthy Homes Initiative (GHHI) as they refer eligible properties for the LHRD program. The LHRD program plans to apply for, and award funding from HUD's OLHCHH to provide environmental training for an additional 80 residents. This will help to sustain the existing pool of contractors that perform lead remediation and increase the opportunity for more environmental firms' units to assist with the program.

Due to the national Covid-19 pandemic, the City of Memphis LHRG had to temporarily suspend/ delay the start-up and production phase of the grant which includes intake, inspections, bidding, and abatement, and healthy homes intervention activities. As the City becomes safer, the program continues to experience delays with materials and supplies and working with a limited contractor pool. The program's staff remain diligent and dedicated to continuing the work of reducing lead hazards in homes within the City.

### Actions taken to reduce the number of poverty-level families. 91.220(k); 91.320(j)

The City is focused on preventing homelessness; expanding early childhood programs; improving access to parks, libraries, and community centers; expanding youth and jobs programs, and expanding access to broadband. Activities aimed at reducing the poverty rate in Memphis include: working to close Memphis wealth gap by prioritizing spending with M/WBE's and offering M/WBE certification and TA support; increasing job access for Memphians by championing funding increases for the Memphis Area Transit Authority; developing a long-term plan for needs based universal pre-kindergarten; creating jobs through major economic development projects; connecting unhoused persons to supportive wraparound services to reduce returns to homelessness; extending the hours of operation for libraries and community centers; providing free camps for spring and summer breaks; increasing programming offered through city divisions; increasing the economic self-sufficiency of public housing and housing choice voucher tenants; assisting low- and moderate-income citizens with assistance for home purchases; providing public service activities for youth, elderly, homeless, community health care, and education services to low- and moderate-income citizens.

All of these actions show the City of Memphis priority of reducing poverty. Data from the American Community Survey (ACS) demonstrates that the City is making gradual strides in this effort. Memphis poverty rate has been steadily declining since 2016. 2016 ACS 5-yr data reported a poverty rate of 27.6% compared to the 2022 rate of 23.6%, with the largest reductions between 2018 to present.

In 2023, the City of Memphis also became one of 25 cities involved in the Bloomberg American Sustainable Cities (BASC) program. This initiative provides technical assistance, training, and support to pursue federal funding opportunities aimed at furthering efforts at the intersection of climate action and racial wealth equity. In addition, the City is provided with three full time staff for 3 years to work under the

### Actions taken to develop institutional structure. 91.220(k); 91.320(j)

HCD restructured its organization to improve alignment of its programs and operations. A major effort was the hiring of consultants to develop training protocol to train the compliance and program staff to effectively administer programs. The restructuring of the Compliance department focused on mandatory areas of entitlement and competitive grant programs, including Section 106, Section 504, Section 3, Environmental Reviews, and Davis Bacon wage rates. This team provided expertise to the program areas on these requirements and coordinated the required actions for projects. The monitoring team consist of grant specific experts that provide day-to-day guidance and direction to program staff on projects and contract management. HCD has an increased focus on data and analytics to assist in industry expertise, decision making and tracking performance. HCD made significant changes in the program areas and departments in 2022 and is continually analyzing our institutional structure to make improvements based on national best practices and feedback loops with partner agencies. Recent changes include the addition of the HOME-ARP program to the Affordable Housing Department. The Development Services Department also realigned and oversees programs that provide more direct services through CDBG funds, including Neighborhood Economic Development Initiatives, Aging in Place and Shelby County Lead match funding. The restructuring of the lead-based paint hazard reduction and weatherization departments to combine under the umbrella of Healthy Homes with a new Healthy Homes Administrator reflects HCD's focus on the whole home – providing safe, decent and healthy housing for Memphians. The Healthy Homes department will continue focusing on weatherization and reduction of lead hazards, while expanding their capacity to advocate for healthy housing policies and pursuing additional funding opportunities to address current program limitations that will allow for holistic critical home repair.

HCD has effective partnerships with others working in housing and community development in the region. These include CHDOs, CDCs, other nonprofit housing providers, for profit developers, the Memphis Housing Authority, lenders, the Tennessee Housing Development Agency, the Health Education and Housing Facilities Board, service providers, government agencies, and other related entities. These partnerships help to leverage federal and local resources and create more affordable housing opportunities.

# Actions taken to enhance coordination between public and private housing and social service agencies. 91.220(k); 91.320(j)

Memphis has a good history of successful partnerships aimed at providing housing and community development programs and services to its citizens. A variety of public and private resources are coordinated to help Memphis' families and individuals through traditional and innovative approaches to meeting these needs. Annually, local service providers and developers are invited to submit applications for funding from the Strategic Community Investment Fund (commonly referred to as SCIF). SCIF provides an opportunity for organizations and agencies to submit competitive applications. The funds are awarded to eligible nonprofit, for-profit, faith-based, and other organizations to implement community and economic development programs. The funds through this process are primarily available for programs that benefit low and moderate-income persons of Memphis and must be aligned with the City of Memphis' 5-year Consolidated Plan.

HCD continues to work with key local government departments to carry out housing and community development strategies that are in alignment with the 5-year Consolidated Plan as well as the City's Comprehensive Plan, Memphis 3.0, and the Joint Housing Policy Plan. These agencies include but are not limited to: Memphis Police Department, Memphis Fire Department, Public Works, Engineering, Public Services and Neighborhoods, General Services, the Office of Planning and Development, Shelby County Housing, Shelby County Health Department, Office of Community Services, Memphis Light Gas and Water, Shelby County Schools, the Weatherization Program, the Lead Hazard Reduction Program, the Green and Healthy Homes Initiative, and the Memphis Housing Authority. These departments have a

role in shaping and maintaining healthy communities. HCD and these agencies also collaborate with community stakeholders to strategically address the needs of the community by deploying existing entitlement funds, the Memphis Affordable Housing Trust Fund, and innovative funding established through public-private partnerships. Community stakeholders include local nonprofit service providers, homeless service and housing providers, community housing development organizations, community development corporations, faith-based institutions, organizations serving persons with special needs, foundations, intermediaries, private housing developmers, quasi government agencies, and others.

HCD continues to work closely with the regional and local HUD field office to receive technical assistance and trainings as needed, as well as working together on shared initiatives and events such as Fair Housing and others. HCD works with the State Housing Agency (the Tennessee Housing Development Agency) through several programs and opportunities including: low- income housing tax credits, multifamily programs, anti-blight programs, networking and information sharing through the Tennessee Affordable Housing Coalition, and other initiatives. Around economic development, HCD works closely with its partners charged with economic development to make connections between entrepreneurs, businesses, training programs, and job seekers to enhance access to jobs and economic growth and opportunities.

# Identify actions taken to overcome the effects of any impediments identified in the jurisdictions analysis of impediments to fair housing choice. 91.520(a)

Since the completion of the Analysis of Impediments to Fair Housing Report in 2019, both the City of Memphis and Shelby County continue to take actions to affirmatively further fair housing choice and address fair housing issues in their communities. During the planning process for the FY25-29 Consolidated Plan, HCD and Shelby County Housing worked together over several months to produce the 2024 update to this document. Goals were updated based on current data and also evolved to include a focus on climate action, environmental justice and healthy housing.

HCD works closely with MHA to provide maps to identify non-impacted areas with housing opportunities in low-poverty and/or opportunity neighborhoods. These maps are provided to voucher holders at their briefing and are used to educate them about the full range of areas where they may look for housing in areas with more opportunities for their families. The maps described enabled the HCV Department to determine where additional outreach was necessary to identify and recruit owners with rental units in low-poverty and/or opportunity neighborhoods. As a result, MHA conducted landlord outreach in these targeted areas and resulted in many new participating units. Additionally, an on-line property listing service for all landlords in Memphis and Shelby County is maintained. This service allows property owners with available rental units to list their vacancies in an easily accessible format for HCV families who are actively looking for housing.

PY2024, HCD allocated \$140,000 in CDBG funds for activities that affirmatively furthered fair housing in

Memphis. HCD continued its agreement with Memphis Area Legal Services to operate the Memphis Fair Housing Center, which is located at 22 N Front St #1100, Memphis, TN 38103. The contract called for outreach, education, investigation and enforcement activities, which benefitted 360 individuals. In PY24, funds were used to help pay for operating costs of the Center, including a portion of staff salaries. MALS took enforcement actions on 139 fair housing complaints, had 178 fair housing Intakes and trained 10 fair housing testers that conducted 20 total tests. HCD will continue to work with partner agencies to undertake actions to overcome impediments to fair housing that were identified in the Analysis of Impediment Report and Update.

## CR-40 - Monitoring 91.220 and 91.230

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

HCD's Compliance and Monitoring Department (CMD), along with assistance from program and accounting staff conducts on-going project monitoring that reviews the programmatic and financial aspects of HCD's federally funded programs. HCD program staff reviews monthly and quarterly reports submitted by sub-recipients for compliance with federal regulations regarding use of federal funds and the implementation of the program, project or activity. Development projects are reviewed on a quarterly basis along with the Request for Funds submitted by the sub-recipient or CHDO. CMD's compliance monitors conduct annual on-site and desk monitoring of both short and long-term projects, by the end of each fiscal year. The Compliance and Monitoring Department also focuses on cross-cutting requirements of the CDBG, ESG, HOME and HOPWA programs, which include: Davis Bacon, Environmental Reviews, Section 3 and Section 504. CMD provides guidance to the program areas on these requirements and coordinate the required actions for each project. The City of Memphis created the Office of Business Diversity and Compliance (OBDC) to increase the number of M/W/SBEs certified with the City of Memphis and assist with strengthening the capacity of these companies so that they might better compete for opportunities in City of Memphis government contracting. HCD's Planning and Policy Department works with other departments and consultants to ensure that comprehensive planning requirements are met and to assess progress made towards consolidated planning goals.

# Describe the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.

HCD provided citizens with reasonable notice and an opportunity to comment on the performance report. HCD published a notice of the availability of the draft CAPER through emails and social media at least 15 days before the deadline for submission to HUD. Copies of the draft CAPER were made available for a fifteen-day public review and comment period that was from September 11, 2024 to September 26, 2024. HCD undertook these measures to provide citizens with reasonable notice and an opportunity to comment on the performance report.

# CR-45 - CDBG 91.520(c)

# Specify the nature of, and reasons for, any changes in the jurisdiction's program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.

HCD utilizes CDBG funds for a variety of activities aligned with federal goals of providing affordable housing, anti-poverty programs, and infrastructure development. While HCD has not made any changes to its program objectives, we are making changes to the way programs are managed and administered based on previous experiences. These two potential future changes include 1) creating a pre-application for Neighborhood Economic Development Opportunities (NEDO) projects and 2) adding parameters to SCIF that would prevent agencies that didn't expend previous funds within a certain timeframe from applying for additional funding. The first process change will improve efficiencies in the application and review process, while the second will ensure that funds for supportive services are expended in a timely manner, maximizing the effect of subgrantee activities.

# Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?

No

## CR-50 - HOME 91.520(d)

Include the results of on-site inspections of affordable rental housing assisted under the program to determine compliance with housing codes and other applicable regulations. Please list those projects that should have been inspected on-site this program year based upon the schedule in §92.504(d). Indicate which of these were inspected and a summary of issues that were detected during the inspection. For those that were not inspected, please indicate the reason and how you will remedy the situation.

For projects carried out under the Affordable Housing Department, each reimbursement request for all HOME-assisted projects are inspected on site by an internal construction inspector for project compliance with HOME regulations. There were on-site inspections of the affordable rental housing assisted under the program to determine compliance with applicable regulations. All inspectors verified the work completed and in compliance with the applicable regulations. All housing projects administered through the CHDO program were also inspected and approved through the Affordable Housing Department before any payments are made to the CHDO. The department requests that inspections be conducted during the construction or rehab of each project, as well a final inspection after the construction or rehab work has been completed. The CHDO Analysts also attend the inspections. There were no issues discovered during any of the inspection visits. HCD's Compliance Department is responsible for the inspections during the affordability period as it relates to rental projects.

Further, other inspections included both the TBRA and HOPWA programs. Also, several of HCD's subrecipient clients have preexisting conditions, which greatly affected conducting annual inspections or inspecting the units where clients were housed. All units included in the TBRA program passed the Housing Quality Standards before a tenant moved into the unit. All Inspections on these units were completed annually. Similarly, the compliance department embarked on the environmental reviews (ERs) of all the projects to ensure that all activities aligned with the applicable regulations.

## Provide an assessment of the jurisdiction's affirmative marketing actions for HOME units. 92.351(b)

The City of Memphis in compliance with the federal regulations published as the final rule on September 16, 1996, for the HOME Investment Partnerships Act at Title II of the Cranston-Gonzalez National Affordable Housing Act, as amended, (42 U.S.C. 12701 et seq.) maintains affirmative marketing procedures and requirements for rental and homebuyer projects containing 5 or more HOME-assisted units. Organizations that enter into contractual agreement with the City of Memphis to develop projects consisting of 5 or more HOME-assisted units will take steps to provide information and otherwise attract eligible persons in the housing market area to available housing without regard to race, color, national origin, sex, religion, familial status or disability. (The affirmative marketing procedures do not apply to

OMB Control No: 2506-0117 (exp. 09/30/2021) CAPER – Memphis PY23/FY24 families with Section 8 tenant-based rental housing assistance or families with tenant-based rental assistance provided with HOME funds.) The affirmative marketing requirements and procedures require at minimum, but are not limited to, the following: 1. Developers of eligible HOME-assisted projects must adopt methods for informing the public, owners, and potential tenants about Federal Fair Housing Laws and the City's Affirmative Marketing Policy (e.g., the use of the Equal Housing Opportunity logotype or slogan in press releases and solicitations for owners, written communication to fair housing and other groups, and use of the City of Memphis Fair Housing Brochure). 2. Developers of eligible HOME-assisted projects must use the Equal Housing Opportunity logotype or slogan in any advertisement purchased from commercial media. 3. Developers of eligible HOME-assisted projects must display the Fair Housing Poster in view of any potential tenant, owner and the public. 4. To the extent practicable, the developer of eligible HOME-assisted units must use community contacts for marketing such units and reach out to inform and solicit applications from persons who would not likely apply without special outreach (e.g., neighborhood associations, community development corporations, places of worship, employment centers, fair housing groups, or housing counseling agencies). 5. Developers of eligible HOME-assisted units will maintain records that describe the actions taken to affirmatively market units and in such form to assess the results of these actions. 6. As a part of the City of Memphis HOME Program requirements, the City will monitor the compliance with these affirmative marketing procedures and requirements. The City will seek expeditious correction of any infractions and make referrals to proper enforcement agencies as appropriate and applicable.

## Data on the amount and use of program income for projects, including the number of projects and owner and tenant characteristics.

The amount of Program Income in PY23/FY24 was \$314,810.04, which was used to for HOME TBRA, Down Payment Assistance and administration fees. The HOME TBRA programs funded with PI were CAAP, Inc and Case Management, Inc. CAAP, Inc serves extremely low-income persons that are homeless and graduates of alcohol/drug treatment recovery programs and their dependents. Case Management, Inc serves extremely low-income persons who are homeless and have a diagnosed mental illness and their dependents. The HOME funded DPA program provides down payment assistance to households earning up to 80% of the Area Median Income to purchase their own home.

## Other actions taken to foster and maintain affordable housing. 91.220(k) (STATES ONLY: Including the coordination of LIHTC with the development of affordable housing). 91.320(j)

During the 2023 program year, HCD took the following actions to foster and maintain affordable housing: provided down payment assistance to homeowners; supported the activities of Community Housing Development Organizations and Community Development Corporations to acquire, rehabilitate, or construct affordable housing; supported the Memphis Fair Housing Center on their investigations, education, and outreach; supported activities aimed at reducing blight; supported the Memphis Housing Authority's efforts to revitalize public housing and neighborhoods through the Choice Neighborhood Implementation Grant for South City; supported the development of affordable rental housing through the low income housing tax credit program; supported Tenant Based Rental Assistance programs for populations with special needs; identified a pipeline of affordable housing projects for funding consideration through HCD's competitive grant process and other strategic development opportunities; and implemented the Memphis Affordable Housing Trust Fund. In addition to HOME funds being used for CHDO projects and the DPA program, the City is supporting the redevelopment/preservation of Greenbriar Apartments. The total project is 208 units, including 31 HOME funded units. This projects previous LIHTC funding ended and is being redeveloped through a combination of new 4% LIHTC, a PILOT and Bond from the Health, Educational and Housing Facility Board, \$2.5M of HOME funding, and sources of private funding.

## CR-55 - HOPWA 91.520(e)

#### Identify the number of individuals assisted and the types of assistance provided

Table for report on the one-year goals for the number of households provided housing through the use of HOPWA activities for: short-term rent, mortgage, and utility assistance payments to prevent homelessness of the individual or family; tenant-based rental assistance; and units provided in housing facilities developed, leased, or operated with HOPWA funds.

Number of Households Served Through:	One-year Goal	Actual
Short-term rent, mortgage, and utility assistance		
to prevent homelessness of the individual or		
family	275	198
Tenant-based rental assistance	165	148
Units provided in permanent housing facilities		
developed, leased, or operated with HOPWA		
funds	16	12
Units provided in transitional short-term		
housing facilities developed, leased, or operated		
with HOPWA funds	65	42
Total	521	400

Table 15 – HOPWA Number of Households Served

#### Narrative

Besides the activities listed above, HOPWA also provided supportive services to 700 individuals, which brings the total number of individuals served to over 1,200 inclusive of household members. HOPWA TBRA was provided to 148 households in partnership with Hope House and Friends for All. Friends for All also supported 198 households through Short-term rent, mortgage, and utility (STRMU) assistance and 12 units of stable housing for persons w/HIV facing chronic homelessness through their Master Leasing program. Case Management Inc's Peabody House provided transitional housing and supportive services to 42 individuals. Housing assistance through all HOPWA programs includes wraparound services to help individuals living w/HIV and their families to thrive. Additional supportive services through Friends for All include food supportive services; a food pantry; HIV/AIDS counseling, testing and referrals; the Positive Living Center and Wellness University which focus on meeting holistic households needs, medication management, and support; dental services; and Ryan White programming.

## CR-58 – Section 3

## Identify the number of individuals assisted and the types of assistance provided

Total Labor Hours	CDBG	HOME	ESG	HOPWA
Total Number of Activities	2	4	0	0
Total Labor Hours	80,803	34,703	0	0
Total Section 3 Worker Hours	44,270	15,284	0	0
Total Targeted Section 3 Worker Hours			0	0

Table 16 – Total Labor Hours

Qualitative Efforts - Number of Activities by Program	CDBG	HOME	ESG	HOPWA
Outreach efforts to generate job applicants who are				
Public Housing Targeted Workers				
Outreach efforts to generate job applicants who are				
Other Funding Targeted Workers.				
Direct, on-the job training (including apprenticeships).				
Indirect training such as arranging for, contracting for, or				
paying tuition for, off-site training.				
Technical assistance to help Section 3 workers compete				
for jobs (e.g., resume assistance, coaching).				
Outreach efforts to identify and secure bids from Section	1	1		
3 business concerns.	1 4			
Technical assistance to help Section 3 business concerns		1		
understand and bid on contracts.		4		
Division of contracts into smaller jobs to facilitate				
participation by Section 3 business concerns.				
Provided or connected residents with assistance in				
seeking employment including: drafting				
resumes, preparing for interviews, finding job				
opportunities, connecting residents to job placement				
services.				
Held one or more job fairs.				
Provided or connected residents with supportive				
services that can provide direct services or referrals.				
Provided or connected residents with supportive				
services that provide one or more of the following: work				
readiness health screenings, interview clothing,				
uniforms, test fees, transportation.				

Assisted residents with finding child care.		
Assisted residents to apply for, or attend community		
college or a four year educational institution.		
Assisted residents to apply for, or attend		
vocational/technical training.		
Assisted residents to obtain financial literacy training		
and/or coaching.		
Bonding assistance, guaranties, or other efforts to		
support viable bids from Section 3 business concerns.		
Provided or connected residents with training on		
computer use or online technologies.		
Promoting the use of a business registry designed to		
create opportunities for disadvantaged and small		
businesses.		
Outreach, engagement, or referrals with the state one-		
stop system, as designed in Section 121(e)(2) of the		
Workforce Innovation and Opportunity Act.		
Other.		

Table 17 – Qualitative Efforts - Number of Activities by Program

#### Narrative

One CDBG project is the Historic Melrose High School revitalization. This project is a mixed-use community center that will take place in two phases. The first phase (complete) includes a library and genealogy center on the first floor, and the second phase will build affordable senior housing on the second and third floors of the building. The second is a Neighborhood Economic Development project with Girls, Inc – a nonprofit that develops young women skills through direct services and advocacy.

The HOME projects include 1492 Alcy Rd and 1728 Alcy Rd – two new construction single family homes that will be sold to first time homeowners. Greenbriar is an apartment complex in the Frayser neighborhood. The City of Memphis is an investment partner on the project to perform substantial rehabilitation and renovation to maintain 208 units of quality, affordable rental housing. Place of Grace is another substantial rehabilitation project that is located in the Uptown area. When complete, it will provide 10 units of senior affordable housing, including wraparound services.

There were over one hundred Section 3 workers employed during FY2024.

## CR-60 - ESG 91.520(g) (ESG Recipients only)

## ESG Supplement to the CAPER in *e-snaps*

## For Paperwork Reduction Act

## 1. Recipient Information—All Recipients Complete

Basic Grant Information		
Recipient Name	MEMPHIS	
Organizational DUNS Number	051386258	
	626000264	
EIN/TIN Number	626000361	
Indentify the Field Office	KNOXVILLE	
Identify CoC(s) in which the recipient or subrecipient(s) will provide ESG assistance	Memphis/Shelby County CoC	
ESG Contact Name		
Prefix	Ms	
First Name	Ashley	
Middle Name		
Last Name	Cash	
Suffix		
Title	Director	
ESG Contact Address		
Street Address 1	170 North Main Street, 3rd Floor	
Street Address 2	0	
City	Memphis	

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State	TN
ZIP Code	-
Phone Number	9015767304
Extension	0
Fax Number	0
Email Address	Ashley.cash@memphistn.gov
G Secondary Contact	
Prefix	Ms
First Name	Kimberly
Last Name	Mitchell
Suffix	0
Title	HSN Administrator
Phone Number	9016367347
Extension	0

## 2. Reporting Period—All Recipients Complete

Program Year Start Date	07/01/2023	
Program Year End Date	06/30/2024	

## 3a. Subrecipient Form – Complete one form for each subrecipient

Subrecipient or Contractor Name City State Zip Code DUNS Number Is subrecipient a vistim services provider Subrecipient Organization Type ESG Subgrant or Contract Award Amount

## **CR-65 - Persons Assisted**

#### 4. Persons Served

## 4a. Complete for Homelessness Prevention Activities

Number of Persons in Households	Total
Adults	155
Children	4
Don't Know/Refused/Other	0
Missing Information	0
Total	159

Table 18 – Household Information for Homeless Prevention Activities

## 4b. Complete for Rapid Re-Housing Activities

Number of Persons in Households	Total
Adults	32
Children	26
Don't Know/Refused/Other	0
Missing Information	0
Total	58

Table 19 – Household Information for Rapid Re-Housing Activities

## 4c. Complete for Shelter

Number of Persons in Households	Total
Adults	432
Children	711
Don't Know/Refused/Other	0
Missing Information	0
Total	1,143

Table 20 – Shelter Information

#### 4d. Street Outreach

Number of Persons in Households	Total
Adults	54
Children	0
Don't Know/Refused/Other	0
Missing Information	0

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Total			54

Table 21 – Household Information for Street Outreach

#### 4e. Totals for all Persons Served with ESG

Number of Persons in Households	Total
Adults	672
Children	741
Don't Know/Refused/Other	1
Missing Information	0
Total	1,414

Table 22 - Household Information for Persons Served with ESG

## 5. Gender—Complete for All Activities

	Total
Male	487
Female	859
Transgender	41
Don't Know/Refused/Other	27
Missing Information	0
Total	1,414

Table 23 – Gender Information

## 6. Age-Complete for All Activities

	Total
Under 18	741
18-24	184
25 and over	488
Don't Know/Refused/Other	1
Missing Information	0
Total	1,414

Table 24 – Age Information

## 7. Special Populations Served—Complete for All Activities

Subpopulation	Total	Total Persons Served – Prevention	Total Persons Served – RRH	Total Persons Served in Emergency Shelters
Veterans	10	0	0	10
Victims of Domestic				
Violence	53	44	0	9
Elderly	17	0	0	17
HIV/AIDS	20	12	0	8
Chronically				
Homeless	111	0	18	93
Persons with Disabilit	ies:			
Severely Mentally III	176	45	6	125
Chronic Substance				
Abuse	72	4	1	67
Other Disability	192	47	6	139
Total (Unduplicated				
if possible)	656	157	31	468

#### Number of Persons in Households

Table 25 – Special Population Served

## CR-70 – ESG 91.520(g) - Assistance Provided and Outcomes

## 8. Shelter Utilization

	Number of Units
Number of New Units - Rehabbed	0
Number of New Units - Conversion	0
Total Number of bed-nights available	320,287
Total Number of bed-nights provided	320,287
Capacity Utilization	100%

Table 26 – Shelter Capacity

# 9. Project Outcomes Data measured under the performance standards developed in consultation with the CoC(s)

The Memphis and Shelby County Homeless Consortium adopted a set of performance measures and performance targets in 2012 and has revised them each year. The measures are directly related to the requirements of the HEARTH Act, as well as those identified locally such as occupancy and cost effectiveness. The measures assess performance in emergency shelter, transitional housing, permanent supportive housing, and rapid re-housing. The performance benchmarks are included in the contracts between the City of Memphis and the subrecipients.

## **CR-75** – Expenditures

## **11. Expenditures**

## **11a. ESG Expenditures for Homelessness Prevention**

	Dollar Amount of Expenditures in Program Year		
	FY 2021	FY 2022	FY 2023
Expenditures for Rental Assistance		9,999.82	1,080.00
Expenditures for Housing Relocation and			
Stabilization Services - Financial Assistance			
Expenditures for Housing Relocation &			
Stabilization Services - Services			
Expenditures for Homeless Prevention under			
Emergency Shelter Grants Program			
Subtotal Homelessness Prevention	0	9,999.82	1,080.00

Table 27 – ESG Expenditures for Homelessness Prevention

## 11b. ESG Expenditures for Rapid Re-Housing

	Dollar Amount of Expenditures in Program Year		
	FY 2021	FY 2022	FY 2023
Expenditures for Rental Assistance		127,168.69	87,500.00
Expenditures for Housing Relocation and	11,142.56	10,500.00	
Stabilization Services - Financial Assistance			5,507.30
Expenditures for Housing Relocation &			
Stabilization Services - Services			
Expenditures for Homeless Assistance under			
Emergency Shelter Grants Program			
Subtotal Rapid Re-Housing	11,142.56	137,668.69	93,007.30

Table 28 – ESG Expenditures for Rapid Re-Housing

## **11c. ESG Expenditures for Emergency Shelter**

	Dollar Amoun	Dollar Amount of Expenditures in Program Year		
	FY 2021	FY 2022	FY 2023	
Essential Services		19,716.36	25,429.00	
Operations		125,552.00	104,530.89	
Renovation				
Major Rehab				
Conversion				

Subtotal	0.00	145,268.36	129,959.89
	-		

#### Table 29 – ESG Expenditures for Emergency Shelter

#### 11d. Other Grant Expenditures

	Dollar Amount of Expenditures in Program Year			
	FY 2021 FY 2022 FY 2023			
Street Outreach				
HMIS	496.63	500.00	6,879.21	
Administration	247.77	10,248.29	17,171.49	

Table 30 - Other Grant Expenditures

## 11e. Total ESG Grant Funds

Total ESG Funds Expended	FY 2021	FY 2022	FY 2023
	14,949.53	357,391.74	248,097.89

Table 31 - Total ESG Funds Expended

#### 11f. Match Source

	FY 2021	FY 2022	FY 2023
Other Non-ESG HUD Funds			
Other Federal Funds			
State Government			
Local Government			67,750.00
Private Funds	14,950.00	320,580.00	170,960.00
Other		36,820.00	8,320.00
Fees			
Program Income			
Total Match Amount	14,950.00	357,400.00	249,030.00

Table 32 - Other Funds Expended on Eligible ESG Activities

## 11g. Total

Total Amount of Funds Expended on ESG Activities	FY 2021	FY 2022	FY 2023
	14,950.00	714,791.74	497,127.89

Table 33 - Total Amount of Funds Expended on ESG Activities