

Annual Action Plan 2023-2024

JACKSON, TENNESSEE COMMUNITY DEVELOPMENT PROGRAM



**Jackson Housing Authority
Community Development Office**

Submitted:

May 2023

Executive Summary

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

1. Introduction

The City of Jackson is an entitlement city and receives funding through the U.S. Department of Housing and Urban Development (HUD). These funds are in the form of the Community Development Block Grant (CDBG) and the HOME Investment Partnerships (HOME). The Jackson Housing Authority's Community Development Office (JHA-CD) is responsible for the administration and planning of the City of Jackson Community Development Program. The JHA-CD will utilize the Consolidated Plan as a guide for program development and implementation as well as a tool to leverage federal, private, and state funding to accomplish and maximize results of defined goals and objectives on a yearly basis. Other HUD programs are funded separately to local non-profit agencies and/or directly to the Jackson Housing Authority, e.g. the Housing Opportunities for Persons with HIV/AIDS (HOPWA) programs, the ROSS grant, the HUD VASH, Emergency Solutions Grant, and other programs that meet the community's needs. The funds are combined with several local funding sources and private funds to support housing and community development initiatives.

The JHA-CD prepares an Annual Action Plan yearly based on the goals and strategies as outlined in the five-year Consolidated Plan. This plan provides HUD, local partners, and the citizens of Jackson with the strategies that the JHA-CD will implement in cooperation with local non-profit organizations to affect the areas of housing, homeless, community, and economic development. The plan describes the housing and community development goals, program leveraging, and monitoring strategies and procedures.

This year's Annual Action Plan is the fourth annual plan of the Five-Year Consolidated Plan, 2020-2024. Jackson's 2023-2024 Annual Action Plan sets forth the activities that reflect the optimum use of CDBG and HOME funds with available HUD resources. The activities within this Action Plan are classified into Neighborhood Revitalization Strategy Area (NRSA), Housing, Public Services, Public Facilities, Homeless, Economic Development, and Program Administration/Planning. In addition, certain annual initiatives will address actions that address impediments to fair housing. These actions will be presented in the Fair Housing Section and identified in the activities if impacted by the impediment actions and remediation. These activities emphasize the importance of partners in working towards a common goal of improving the Jackson community. Overall, this year's Action Plan provides a comprehensive overview of the activities to be undertaken during the program year.

The City also was allocated in the prior years CARES Act and HOME American Rescue Plan funding and is working purposefully to prevent, prepare for and respond to the coronavirus within our community.

2. Summarize the objectives and outcomes identified in the Plan

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

The Housing and Community Development Act, as amended, has stated that the three broad objectives of the program that best describe the purpose and principles of the Five-Year Plan are:

- Suitable Living Environment
- Decent Affordable Housing
- Economic Opportunities

The priorities of the 2020-2024 Consolidated Plan were established after substantial planning and public input and connect with actions to address impediments identified in the 2019 Fair Housing Analysis. Citizens also provided insight to the community needs through public hearings and other means of feedback (email, verbal, etc). As a result, the summary of community needs as perceived by the public and stakeholders are:

- Increased need for affordable housing; Single family and multi-family
- Need for more 1 bedroom housing units
- Funding resources
- Landlord incentives
- Developer incentives
- Housing repair

3. Evaluation of past performance

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

The 2021-2022 CAPER evaluated the City of Jackson's performance in meeting the affordable housing and community development needs for the year. The report also provides an assessment of the City's progress in addressing the priorities and objectives of the 2020–2024 Consolidated Plan.

During the last report year, which was the second year of the Consolidated Plan, Program Year 2021-2022, the City received \$615,587 in CDBG entitlement funds and \$340,526 in HOME Program entitlement funds. The City allocated the majority of its funds for projects and activities for neighborhood revitalization (Section 108 Loan Repayment), housing, and public services. The City also

received an additional allocation under CDBG-CV (CARES Act) and HOME-ARP of \$455,303 and \$1,232,967 respectively.

The attached document (Table 1) is a summary of the City’s past performance as reported to HUD in the Consolidated Annual Performance Report (CAPER) for overall performance in Program Year 2021-2022. Final data has not been collected for the current 2022-2023 program year.

Community Development Expenditures Beneficiaries by Project FY 2021-2022											
Project	CDBG	HOME	CDBG-CV		Expended	Households Served	Individuals Served	LMI Area Served	Household Goal	Individual Goal	LMI Area Goal
	✓	✓	✓	Admn	\$ 142,696.60						
	✓			Minor Repair	\$ 109,720.00	14			11		
	✓			108 Loan Payments	\$ 241,276.90	na	na				
	✓			Public Services							
				West Tennessee Legal Services	\$ 20,000.00	377				80	
				WIOA At-Risk/Disabled Youth Pro	\$ 30,000.00	-	63			40	
				RIFA	\$ 10,000.00		1,360			300	
				Area Relief Ministries	\$ 15,000.00		5			10	
	✓			Genesis/CBDO							
				Genesis-Boys/Girls Club	\$ 50,000.00		78			150	
				Financial Empowerment Center	\$ 25,000.00		49				
		✓		Target Rehab	\$ -	-				3	
		✓		CHDO-Jonah Affordable Housing C	\$ -	-				2	
		✓		CHDO- SWCDC, Inc.	\$ 97,803.50	1				2	
	✓			JCIL	\$ 18,856.93	4				4	
			✓	United Way (coronavirus response	\$ 19,512.07	last payment for hotspots				10	
				TVOH II Multi-Family Renov. Loan	\$ 500,000.00						
				Total	\$ 1,279,866.00	396	1,555	-	32	580	-
Due to coronavirus, there are still restrictions that had an effect on number of clients served (i.e. number of children gathering at B&G Club etc) which caused some lower outcomes versus goals.											

FY 2021-2022 Expenditures & Beneficiaries

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

Citizen participation process included holding a public hearing meeting on the community development needs and a public hearing on presentation of the proposed Annual Action Plan 2023-2024 for public review. Publication of the notices of these hearings were published in the West Tennessee Crimeseen Examiner, a minority owned local newspaper. Notices of hearings were also emailed to agencies and interested parties. In addition, the Notices of Public Hearings would be made available in Spanish, if needed. The needs public hearing was held March 14, 2023, at 3:00 p.m. in person with virtual accessibility, if so requested. The Annual Action Plan public hearing was held in person with virtual accessibility, if requested, on April 14, 2023, at 4:00 pm. The Annual Action Plan 2023-2024 was presented to the Jackson Housing Authority's Board of Commissioners and Jackson City Council for

resolution of approval. In all meeting advertisements, special accommodations (including translation, interpretation, and services for the hearing impaired) were made available, but none were requested.

5. Summary of public comments

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

Community Development Needs Public Hearing

On March 14, 2023, the City/Community Development Office conducted a public hearing to receive citizens' input concerning community housing and non-housing needs for the FY 2023-2024 Annual Action Plan. At the public hearing, a summary of the proposed goals of the five-year Consolidated Plan and current programs was given. There was also an update provided on funding levels for Community Development programs. The floor was opened for public comments. The needs/comments expressed were as follows:

- Increased need for affordable housing; Single family and multi-family
- Need for more 1 bedroom housing units
- Funding resources
- Landlord incentives
- Developer incentives
- Housing repair

The above-described needs were discussed. Afterwards, being there no further comments or questions, the meeting was adjourned.

Annual Action Plan 2023-2024 Presentation Public Hearing

On April 14, 2023, the City/Community Development Office held a public hearing to present the proposed Annual Action Plan 2023-2024. The public was made aware that the Jackson Community Development program did receive an approximate 9% increase in both CDBG and HOME program funds. At the public hearing, a summary of the goals of the five-year Consolidated Plan and current programs was given. The floor was opened for public comments.

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

There were no public comments or views that were not accepted for the FY 2023-2024 Annual Action Plan.

7. Summary

The City of Jackson's Annual Action Plan 2023-2024 projects aim to address the housing and community development needs of low to moderate income communities in Jackson. The City of Jackson aims to prioritize available resources to meet the identified needs to revitalize neighborhoods and increase access to affordable housing and other opportunities for the low-income population of Jackson. The 2020-2024 Consolidated Plan provides a framework and path for furthering affordable housing and community development efforts including increasing homeownership opportunities, preserving existing housing, revitalizing neighborhoods, expanding affordable rental options, furthering efforts to reduce homelessness, and supporting job efforts.

PR-05 Lead & Responsible Agencies – 91.200(b)

1. Agency/entity responsible for preparing/administering the Consolidated Plan

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

Agency Role	Name	Department/Agency
CDBG Administrator	JACKSON	Jackson Housing Authority-CD Office
HOME Administrator	JACKSON	Jackson Housing Authority-CD Office

Table 1 – Responsible Agencies

Narrative (optional)

The City of Jackson is a municipal government that receives Federal funds to use for administering the Community Development Program. In 1998, the City of Jackson entered into a Memorandum of Understanding with the Jackson Housing Authority to administer and implement the CDBG and HOME programs and the ESG program funded by the State of Tennessee (ESG is now competitive). The City of Jackson maintained oversight and approval of the above-mentioned programs by the Mayor and City Council. The MOA required the Mayor and City Council to approve the Consolidated Plan, Annual Action Plans, Citizen Participation Plan, and any amendments to these plans. The CAPER is presented to the Mayor and City Council annually. The City, as the participating jurisdiction, is the responsible entity for the Environmental Review process.

The Jackson Housing Authority is the lead agency in preparing the Consolidated Plan, Annual Action Plans, the Citizen Participation Plan and CAPER as well as any HUD applications that fall under the City’s authority for applicant eligibility. The JHA CD office is currently responsible for administration and implementation of the CDBG and HOME grants. Implementation includes financial/audit responsibilities including IDIS setups and drawdowns, subrecipient monitoring, budget preparation, and other federal requirements such as environmental reviews, labor standards, subrecipient monitoring, CHDO monitoring, and various required HUD reports.

Consolidated Plan Public Contact Information

Latonya Fason

Deputy Director/Director of Community Development

Jackson Housing Authority, CD Office

Physical Office: 125 Preston Street

P.O. Box 3188

Jackson, TN 38301

Phone: 731-422-1671 extension 135

Fax: 731-425-4617

E-Mail: lfason@jacksonha.com

AP-10 Consultation – 91.100, 91.200(b), 91.215(I)

1. Introduction

The City of Jackson's JHA -Community Development (CD) program continually obtains input from citizens, professionals, nonprofits, and other governmental entities concerning coordination, programs, needs and information sharing on various topics. These groups including housing providers (CHDOs), homeless providers, (Tennessee Homeless Solutions, Inc., ESG Homeless Providers), fair housing groups- lending institutions, public housing officials and coordination with public housing plan; public services groups including youth services non-profits, e.g. Boys & Girls Club, SWHRA, Inc. (At Risk Youth & Youth with Disabilities Employment Program). Additionally, the City makes available a Community Needs Survey to agencies, as well as to the public if they would like to provide their input in this way as well.

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

The City's JHA-Community Development program retains ongoing relationships with the housing providers in the City of Jackson. The City works in conjunction with CHDO agencies that generate affordable housing development. It also coordinates with the Jackson Center for Independent Living to provide accessibility modification for disabled persons. The City also participates in other partnerships that seek to address other issues that relate to housing and service needs (i.e. Jackson Community Redevelopment Agency, City's Empowerment Task Force). The City also maintains relationships with mental health providers, homeless shelter and services providers, and other governmental homeless services agencies through the Continuum of Care network.

The City works closely with the Jackson Housing Authority (JHA) which organizes resources from the federal government to address the housing needs of the City's lowest income households. The JHA's public housing department coordinates with the mental health provider, Pathways of Jackson, to assist mentally disabled patients living in public housing units at the McMillan Towers development. The JHA also maintains twenty-five HUD VASH vouchers for veterans to assist with housing efforts.

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

The Jackson/West Tennessee COC, formerly operating under the Tennessee Homeless Solutions agency, covers an area that includes 23 counties in West Tennessee (excluding Shelby County). The City has staff that attends the COC meetings, is a member of COC board, and participates with the Point In Time Count. Though no longer administering the Emergency Solutions Grant, City continues consultation with the ESG funded agencies to help address service gaps with the homeless population. Through

the Continuum of Care process and board representation on the COC, the City maintains relationships with homeless shelter and services providers, and other governmental agencies with specific responsibilities for homeless individuals and families. The agencies within the CoC network provide housing assistance and services for homeless families and individuals, which includes veterans, chronically homeless, and unaccompanied youth.

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

Consultation with the Jackson/West TN Continuum is an on-going process. The City and homeless service provider nonprofit agencies coordinate with the COC to prioritize ESG objectives which currently are 1) Rapid Rehousing, 2) Shelter, 3) Homeless Prevention, and 4) Outreach. These priorities take into account performance standards and outcomes. Homeless service provider agencies and the City's CD program office participate in CoC process, meetings and/or board of directors. ESG funding continues to be a resource in the community to best serve those needs. THDA, as the ESG grantor agency, sets the performance standard and evaluates the outcomes as part of the annual performance reports. Needs and outcomes are reported into the HMIS. TN Homeless Solutions is the administrator for the West Tennessee HMIS.

The Jackson Housing Authority coordinates with Tennessee Homeless Solutions to administer 15 Emergency Housing Vouchers and 6 Stability Vouchers for homeless/at risk of homeless & DV persons in the Jackson, Madison County area.

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

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	Jackson Housing Authority
	Agency/Group/Organization Type	Housing PHA
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homelessness Needs - Veterans Homelessness Strategy Market Analysis Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	CD Staff continually consult with the JHA department directors and the Executive Director to discuss priority needs. Public Assisted Housing- The age of the PHA units, approximately 315, are considered obsolete and there is a demand for funds to replace and/or substantially renovate these units. The highest priority for the JHA is seeking out and obtaining resources, e.g. LIHTC, increased Moderate Rehabilitation level of funding from HUD/Congress to provide more safe, decent & affordable housing, while working to deconcentrate poverty areas. The waiting list for the Housing Choice Voucher program has a high number of persons/families. Social Services Department manages the Self Sufficiency program. JHA continues to work with residents through the Family Self Sufficiency program to help them move to homebuyer eligibility. JHA also operates the HUD VASH program.
2	Agency/Group/Organization	SOUTHWEST TENNESSEE CDC
	Agency/Group/Organization Type	Housing CHDO
	What section of the Plan was addressed by Consultation?	Housing Need Assessment

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Consultation with CHDO agencies is on-going to discuss and share information on the needs of affordable housing and process in meeting HOME compliance requirements. CHDO agencies also attend public meetings. The potential outcome is continued coordination for the development and expansion of affordable rental housing in the community through an acquisition/moderate rehab program.
3	Agency/Group/Organization	JONAH Affordable Housing Organization
	Agency/Group/Organization Type	Housing CHDO
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Consultation with CHDO agencies is on-going to discuss and share information on needs of affordable housing and process in meeting HOME compliance requirements. CHDO agencies also attend public meetings. The potential outcome is continued coordination for the development and expansion of affordable rental housing in the community through an acquisition/moderate rehab program
4	Agency/Group/Organization	West Tennessee Legal Services
	Agency/Group/Organization Type	Services - Housing Services-Elderly Persons Services-Persons with HIV/AIDS Services-homeless Services-Education Service-Fair Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy HOPWA Strategy

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Consultation with WTLS is on-going. WTLS attends public meetings and participated in needs surveys. Potential outcomes will be an increased awareness of fair housing.
5	Agency/Group/Organization	TENNESSEE HOMELESS SOLUTIONS
	Agency/Group/Organization Type	Housing Services - Housing Services-homeless
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	CD staff consults with the THS at least quarterly at Continuum of Care network meetings. THS also participates in public meetings and needs survey. Potential outcome will be increased collaboration on housing, homelessness, preventive homeless, and special populations.
6	Agency/Group/Organization	UNITED WAY OF WEST TENNESSEE
	Agency/Group/Organization Type	Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-homeless Services-Education Services-Employment

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Consultation with United Way of West TN is on-going as United Way operates the 2-1-1 and prepares the ALICE report for Madison County. United Way was consulted also in regard to the needs of the community as it relates to COVID-19. Potential outcomes will be increased services to prevent homelessness. United Way partnered with the City in 2022 to operate the Financial Empowerment Center, offering free one on one counseling to primarily low-income individuals.
7	Agency/Group/Organization	BOYS AND GIRLS CLUB OF JACKSON
	Agency/Group/Organization Type	Services-Children Services-Education
	What section of the Plan was addressed by Consultation?	Anti-poverty Strategy Public Service - Youth Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Consultation with the Boys & Girls Club is on-going as the club serves a lot of low-income youth within the City of Jackson through after school & summer programs. Potential outcome will be increased collaboration on services and educational programs for low-income youth.
8	Agency/Group/Organization	JACKSON CENTER FOR INDEPENDENT LIVING
	Agency/Group/Organization Type	Housing Services-Persons with Disabilities
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Consultation with the Jackson Center for Independent Living is on-going as JCIL is an essential provider of services to disabled persons (i.e. accessibility needs). Potential outcome will be increased collaboration on housing needs and services for special needs populations.
9	Agency/Group/Organization	Regional Inter-Faith Association (RIFA)
	Agency/Group/Organization Type	Services-Children Services-homeless
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Consultation with RIFA is on-going through meetings, calls, etc. RIFA is an essential provider of services of food needs to the low-income community. They provide meals to the homeless and have a snack backpack program for youth to assist with meals when children are at home. Potential outcome will be increased meals and nutritional needs for homeless and youth.
10	Agency/Group/Organization	Habitat for Humanity - Jackson TN
	Agency/Group/Organization Type	Housing CHDO
	What section of the Plan was addressed by Consultation?	Housing Need Assessment

<p>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Consultation with CHDO agencies is on-going to discuss and share information on the needs of affordable housing and process in meeting HOME compliance requirements. CHDO agencies also attend public meetings. The potential outcome is continued coordination for the development and expansion of affordable housing for low-income homebuyers in the community through new construction.</p>
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Identify any Agency Types not consulted and provide rationale for not consulting

The City remains inclusionary of all groups for consultation for the Annual Action Plan and Consolidated Planning efforts.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Jackson/West TN Continuum of Care	The goals of the COC were incorporated into the Consolidated Plan.
2020-2024 Analysis of Impediments to Fair Housing	City of Jackson/JHA Community Development	The fair housing needs and goals identified in the AI were incorporated into the Consolidated Plan.
Jackson Housing Authority 2022 Annual Plan	Jackson Housing Authority	The JHA Annual Plan goals coincide with the City's five-year Consolidated Plan and Annual Action Plan goals as they pertain to increasing affordable housing.
City of Jackson Master Plan	City of Jackson, TN	The Master Plan can be utilized to assist in meeting the economic development and housing needs in the city.

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

AP-12 Participation – 91.105, 91.200(c)

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

Citizen participation process included holding a public hearing meeting on the community development needs and a public hearing on presentation of the proposed Annual Action Plan 2023-2024 for public review. Publication of the notices of these hearings were published in the West Tennessee Crimeseen Examiner, a minority owned local newspaper. Notices of meetings were emailed to agencies and other interested parties. In addition, the Notices of Public Hearings were also made available in Spanish, if needed. The needs public hearing was held March 14, 2023, at 3:00 p.m. The Annual Action Plan public hearing was held April 14, 2023, at 4:00 pm. The Annual Action Plan 2023-2024 was presented to the Jackson Housing Authority's Board of Commissioners and Jackson City Council for resolution of approval. In all meeting advertisements, special accommodations (including translation, interpretation, and services for the hearing impaired) were made available, but none were requested.

Public Comment Period

On March 31, 2023, the draft plan was made available to the public for comment for a thirty-day comment period on the Jackson Housing Authority's website. The public could also request an e-mail copy of the draft plan by contacting lfason@jacksonha.com or calling 731-422-1671 ext. 135. To be considered all public comments on the draft Annual Action Plan could also be submitted in writing and received by 4:00 p.m. CDT on April 30, 2023. Comments could also be received by email at lfason@jacksonha.com and by mail at Attn: Annual Action Plan 2023-2024, CD Office, 125 Preston Street, Jackson, TN 38301.

See AD-26 (Administration) for full Citizen Participation documentation.

Public participation in the Annual Action Plan process helped to positively impact goal setting by helping increase awareness of needs in the community. It also increased organizational efforts to address needs identified, whether through submission to the Annual Action Planning process, or through involvement in groups or projects already working on the issue.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
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Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Hearing	Minorities Non-English Speaking - Specify other language: Spanish Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing	A total of two (2) public hearings were held in person with virtual access available. One hearing on community needs was held on March 14, 2023. One hearing to present the proposed Annual Action Plan 2023-2024 was held April 14, 2023. The public hearings were advertised in the West TN Crimeseen Examiner local newspaper, on the West TN Crimeseen Examiner webpage, emailed to participating persons and nonprofit agencies, and posted on the Jackson Housing Authority website. Annual Action Plan	Minutes of all public hearings (March 14, 2023 & April 14, 2023) are included in attachments.	All comments were accepted.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2	Newspaper Ad	Minorities Non-English Speaking - Specify other language: Spanish Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing	Community Development published notice in the West TN Crimeseen Examiner local newspaper advertising availability of draft Annual Action Plan 2023-2024. The notice for Action Plan review provided the start and end dates for the 30-day public review and comment period, outlined a budget of proposed projects and process by which to provide comments. The notice of Community Needs Meeting was also published in the West TN Crimeseen Examiner.	Minutes of all public hearings and any citizen participation comments are included in attachments.	All comments were accepted.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
3	Internet Outreach	Minorities Non-English Speaking - Specify other language: Spanish Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing		No comments received via internet.	All comments were accepted.	www.jacksonha.com

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

The 2023-2024 Annual Action Plan intends to carry out the objectives of the City's community development strategies outlined in the Five-Year Consolidated Plan. As funding allows, the CDBG funds will be utilized to address a range of community development needs. The flexible nature of the CDBG program enables the city to implement a multi-faceted strategy aimed at providing both short term and long-term benefits to its most economically vulnerable residents. The goal is to maximize the efficacy of the program by administering activities that address housing, economic development, and other challenges faced by low to moderate income residents. The HOME program will be utilized to provide a range of direct housing assistance programs. These programs include housing rehabilitation, homeownership assistance, and the increase of affordable units in conjunction with local CHDOs.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	603,996	0	0	603,996	1,440,000	Funding will be spent on a range of programs covering affordable housing, economic development, public services, public facilities, and public improvements.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	412,439	20,000	0	432,439	413,000	Funding will be spent on a range of programs targeting various affordable housing needs including acquisition, single family & multi-family housing rehabilitation, homebuyer assistance, and new housing development when feasible.

Table 5 - Expected Resources – Priority Table

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

HOME Match funds source is the HOME Program Income Fund for each Target Rehab case. CHDO funds are matched/leveraged with in-kind primarily the difference between acquisition price and the appraised value of the structure, as well as donated land. The leverage of CDBG funds will come from non-profits fund resources and/or other local funds.

During the coronavirus pandemic, a waiver was provided to reduce the matching requirement in a major disaster declaration area by 100 percent for FY 2020, FY 2021, and FY 2022 to lessen the economic burden on PJs and eliminate the need to identify other sources of match for HOME activities. For the fiscal year 2023, the HOME match liability will be 12.5%

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

As of now, it is not anticipated that publicly owned land or property located within the jurisdiction will be used to address the needs identified in the plan.

Discussion

In addition to CDBG and HOME funding, other funding was made available to assist with efforts to combat the effects of the coronavirus pandemic. CARES Act funding (CDBG-CV), as part of the Substantial Amendment to Action Plan 2019-2020, are being utilized as reasonable to assist in prevention, preparation, and response to coronavirus as described in the CARES Act and HUD guidelines. Also, a substantial amendment to the 2021-2022 Annual Action Plan was performed to include the allocation of HOME American Rescue Plan (HOME-ARP) funds to be received for activities to assist individuals or households who are homeless, at risk of homelessness, and other vulnerable populations. During the term of this five-year Consolidated Plan, CDBG, HOME and any supplemental funding that might come about for coronavirus response and/or any other major disaster declaration may be utilized to assist in disaster in accordance with HUD and the City's Citizen Participation Plan. The plan for these funds allow for a non-congregate shelter to be constructed.

During the term of this five-year Consolidated Plan, CDBG, HOME and any supplemental funding that might come about for coronavirus response and/or any other major disaster declaration may be utilized to assist in disaster in accordance with HUD and the City's Citizen Participation Plan.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Improve quantity and quality of affordable housing	2020	2025	Affordable Housing	NEIGHBORHOOD REVITALIZATION STRATEGY AREA (NRSA) Jackson LMI Census Tracts Jackson City-wide	Housing Rehabilitation Assistance Non-homeless Persons with Special Needs Increase and Improve the Supply of Rental Housing Increase capacity of CHDO Housing Initiative Provide/Increase Homeownership Opportunities Reduce LBP Hazards Neighborhood Revitalization	CDBG: \$100,197 HOME: \$391,196	Rental units constructed: 1 Household Housing Unit Rental units rehabilitated: 3 Household Housing Unit Homeowner Housing Added: 1 Household Housing Unit Homeowner Housing Rehabilitated: 19 Household Housing Unit Direct Financial Assistance to Homebuyers: 4 Households Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
2	Provide Expanded Economic Opportunities	2020	2025	Non-Housing Community Development	NEIGHBORHOOD REVITALIZATION STRATEGY AREA (NRSA) Jackson LMI Census Tracts	Public Services-Youth Economic Development	CDBG: \$269,000 HOME: \$0	Public service activities other than Low/Moderate Income Housing Benefit: 60 Persons Assisted Homeowner Housing Added: 1 Household Housing Unit
3	Provide a Suitable Living Environment	2020	2025	Non-Housing Community Development	NEIGHBORHOOD REVITALIZATION STRATEGY AREA (NRSA) Jackson LMI Census Tracts Jackson City-wide	Address Impediments to Fair Housing Public Services-Youth Public Services-Other	CDBG: \$103,000 HOME: \$0	Public service activities other than Low/Moderate Income Housing Benefit: 755 Persons Assisted
4	Expand the capacity of homeless providers	2020	2025	Homeless	Jackson LMI Census Tracts Jackson City-wide	Homeless Housing and Services	CDBG: \$11,000 HOME: \$0	Public service activities other than Low/Moderate Income Housing Benefit: 15 Persons Assisted

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Improve quantity and quality of affordable housing
	Goal Description	
2	Goal Name	Provide Expanded Economic Opportunities
	Goal Description	
3	Goal Name	Provide a Suitable Living Environment
	Goal Description	
4	Goal Name	Expand the capacity of homeless providers
	Goal Description	

Projects

AP-35 Projects – 91.220(d)

Introduction

To address the high priority needs identified in the Consolidated Plan 2020-2024, the City of Jackson will invest CDBG and HOME funds in projects that provide fair housing services, provide public services to low- and moderate-income residents, improve economic development opportunities, as well as assist in maintaining and developing affordable housing. Together, these projects will address the housing, community and economic development needs of the city's residents, particularly those residents of low- and moderate-income. Amid the coronavirus pandemic, there may be funding sources utilized and activities undertaken to prevent, prepare and respond to coronavirus as necessary.

Projects

#	Project Name
1	Administration / Planning
2	Minor Repair Program
3	Section 108 Loan Repayments
4	Public Services
5	CBDO-Genesis CDC (Boys & Girls Club)
6	Target Area Housing Rehabilitation
7	CHDO Housing Projects
8	JCIL Accessibility Program for Disabled Persons
9	Homebuyer Assistance

Table 7 - Project Information

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

Allocations and priorities were established by consultations and public meetings. These priorities are focused on the five goals of the Strategic Plan: housing, homelessness, non-homeless special needs, community and economic development, and program administration. Obstacles to addressing underserved needs continue to be more funding resources to accomplish those activities.

AP-38 Project Summary
Project Summary Information

1	Project Name	Administration / Planning
	Target Area	NEIGHBORHOOD REVITALIZATION STRATEGY AREA (NRSA) Jackson LMI Census Tracts Jackson City-wide
	Goals Supported	Improve quantity and quality of affordable housing Provide Expanded Economic Opportunities Provide a Suitable Living Environment Expand the capacity of homeless providers
	Needs Addressed	Housing Rehabilitation Assistance Increase and Improve the Supply of Rental Housing Provide/Increase Homeownership Opportunities Public Services-Youth Public Services-Other Homeless Housing and Services Economic Development Reduce LBP Hazards Increase capacity of CHDO Housing Initiative Non-homeless Persons with Special Needs Address Impediments to Fair Housing Neighborhood Revitalization
	Funding	CDBG: \$120,799 HOME: \$41,243
	Description	Administration & Planning (CDBG Allocation @ 20% & HOME allocation @ 10%); HUD Matrix Code: 21A-General Program Admin; Code citation: Section 570.206, Section 92.205(a)(1)
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	Activities include administration of the CDBG and HOME programs to carry out goals and objectives for the 2023-2024 program year.
2	Project Name	Minor Repair Program
	Target Area	Jackson LMI Census Tracts Jackson City-wide

	Goals Supported	Improve quantity and quality of affordable housing
	Needs Addressed	Housing Rehabilitation Assistance
	Funding	CDBG: \$85,197
	Description	Minor repairs for LMI homeowners' residents on a city-wide basis. HUD Matrix Code: 14A-Single Unit Residential, 14H-Rehab Admin; Code citation: Section 570.202; CDBG national objective: LMH.
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	Minor housing repairs for LMI homeowners throughout the City of Jackson to address repair needs that might be health, safety hazard, or city code violation.
3	Project Name	Section 108 Loan Repayments
	Target Area	NEIGHBORHOOD REVITALIZATION STRATEGY AREA (NRSA)
	Goals Supported	Provide Expanded Economic Opportunities
	Needs Addressed	Economic Development
	Funding	CDBG: \$243,000
	Description	Repayment of the Section 108 Loan (Note date 7/21/2010). HUD Matrix Code: 19F-Planned Repay of Principal on Section 108 Loans; 24A-Payment of Interest on Section 108 Loans; Code citation: Section 570.201(c); CDBG national objective: LMA/slum & blight
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	This activity is for repayment of the Section 108 loan based upon the annual payment schedule.
4	Project Name	Public Services

	Target Area	NEIGHBORHOOD REVITALIZATION STRATEGY AREA (NRSA) Jackson LMI Census Tracts Jackson City-wide
	Goals Supported	Provide Expanded Economic Opportunities Provide a Suitable Living Environment Expand the capacity of homeless providers
	Needs Addressed	Public Services-Youth Public Services-Other Homeless Housing and Services Address Impediments to Fair Housing
	Funding	CDBG: \$90,000
	Description	Public Service Activities: SWHRA At Risk Youth and Youth with Disabilities Job Program (\$26,000), West TN Legal Services-Fair Housing (\$20,000), Area Relief Ministries-FreshSTART employment program for homeless (\$11,000), RIFA-Snack Backpack program for youth (\$11,000), City's Financial Counseling Program (\$22,000). HUD Matrix Code: 05D-Youth Programs, 05J-Fair Housing Activities-Subj.to Public Service Cap, 05H-Employment Training, 05W-Food Banks; 05Z-Other Public Services; Code citation: 570.201(e), CDBG national objective: LMC
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	Activities will include programs to address fair housing, counseling, homeless prevention and services, nutrition, and youth.
5	Project Name	CBDO-Genesis CDC (Boys & Girls Club)
	Target Area	NEIGHBORHOOD REVITALIZATION STRATEGY AREA (NRSA)
	Goals Supported	Provide a Suitable Living Environment
	Needs Addressed	Public Services-Youth
	Funding	CDBG: \$50,000
	Description	CBDO public service activity for Boys/Girls Club Summer Youth Program and After School Program. HUD Matrix Code: 5H-Employment Training, 5D- Youth Services; Code citation: Section 570.204(b)(2)(1); CDBG National Objective: LMC

	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	Activities include after school programs and summer youth programs.
6	Project Name	Target Area Housing Rehabilitation
	Target Area	NEIGHBORHOOD REVITALIZATION STRATEGY AREA (NRSA)
	Goals Supported	Improve quantity and quality of affordable housing
	Needs Addressed	Housing Rehabilitation Assistance Reduce LBP Hazards
	Funding	HOME: \$71,196
	Description	Targeted homeowner housing rehabilitation in low moderate income census tracts HUD Matrix Code: 14A-Single Unit Residential; 1H-Rehab admin; Code citation: Section 570.202, Section 92.205(a)(1). CDBG National Objective: LMH.
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	Activities will include substantial housing repair for low-income homeowners to improve standard housing conditions and reduce safety and health hazards.
7	Project Name	CHDO Housing Projects
	Target Area	NEIGHBORHOOD REVITALIZATION STRATEGY AREA (NRSA) Jackson LMI Census Tracts
	Goals Supported	Improve quantity and quality of affordable housing
	Needs Addressed	Increase and Improve the Supply of Rental Housing Provide/Increase Homeownership Opportunities Increase capacity of CHDO Housing Initiative
	Funding	HOME: \$280,000

	Description	CHDO acquisition/rehab projects and/or housing construction projects; HUD Matrix Code: 14A-Single Unit Residential, 14G-Acquisition for Rehabilitation, 12-Construction of Housing; Code citation: Section 92.300; CDBG national objective: LMH
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	Activities include the acquisition and rehab of properties for rental or homebuyers. Activities may also include new construction of housing for rental or homebuyer projects.
8	Project Name	JCIL Accessibility Program for Disabled Persons
	Target Area	Jackson City-wide
	Goals Supported	Improve quantity and quality of affordable housing
	Needs Addressed	Housing Rehabilitation Assistance Non-homeless Persons with Special Needs Address Impediments to Fair Housing
	Funding	CDBG: \$15,000
	Description	Jackson Center for Independent Living will undertake a program to improve accessibility for disabled persons by providing accessible ramps or other needed exterior modifications to home. HUD Matrix Code: 14A-Single Unit Residential; Code citation: Section 570.202; CDBG national objective: LMH.
	Target Date	6/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	Installation of ramps or other needed exterior modifications as necessary to make homes more accessible for persons with disabilities.
9	Project Name	Homebuyer Assistance
	Target Area	Jackson City-wide

Goals Supported	Improve quantity and quality of affordable housing
Needs Addressed	Provide/Increase Homeownership Opportunities
Funding	HOME: \$40,000
Description	Down payment and/or closing cost assistance to first time homebuyers to make attaining a home more affordable for low-income homebuyers. HUD Matrix Code: 05R-Down Payment Assistance Funds \$20,000 HOME entitlement, \$20,000 program income
Target Date	6/30/2024
Estimate the number and type of families that will benefit from the proposed activities	
Location Description	
Planned Activities	Project includes approving approximately 4 homebuyers with down payment/closing cost assistance to purchase home. Eligible homebuyers will be required to complete the homebuyer education pre-counseling.

AP-50 Geographic Distribution – 91.220(f)

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

The Neighborhood Revitalization Strategy Area (NRSA) encompassed CTs 5-11. The NRSA is occupied by over 70% of LMI households. The NRSA is the area where a majority of HOME and CDBG funds are expended even though some programs such as Minor Repair and the Homebuyers Assistance Program are city-wide programs.

Other local areas are city-wide and LMI Census Tracts where area wide benefits can be provided, e.g. public infrastructure, Target Rehabilitation Program and CHDO Rental Acquisition/Rehabilitation/Homebuyer Program.

Geographic Distribution

Target Area	Percentage of Funds
NEIGHBORHOOD REVITALIZATION STRATEGY AREA (NRSA)	39
Jackson LMI Census Tracts	34
Jackson City-wide	27

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Twenty percent of the households in Jackson are in the NRSA. The NRSA is made up of CTs 5-11 which have over 72% off the residents as LMI. The Section 108 Loan funds were expended to the benefit of NRSA residents (CRA Districts 1 and 2 are located within the NRSA boundaries).

Discussion

Activities located in the NRSA are:

- Section 108 Loan Repayment
- Boys/Girls Club
- Target Housing Rehabilitation Program

Projects located in LMI Census Tracts including the NRSA

- CHDO Rental Acquisition/Rehabilitation/Homebuyer Programs
- SWHRA At Risk Youth & Youth with Disabilities Program

City-wide Programs

- Minor Repair Program
- JCIL Accessibility Program
- Homeless Programs
- Public Services Programs (RIFA, Fair Housing, Financial Counseling FEC)
- Administration/Planning

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

With the housing prices rising and the housing supply plummeting during the coronavirus pandemic, the availability of affordable housing has become a major issue in the City of Jackson. However, the City continues to seek out opportunities that may increase the affordable housing stock in Jackson. This includes allocating funds to CHDO agencies for acquisition and rehabilitation and/or new construction, housing repair programs, and working alongside the Jackson Housing Authority who is largest provider of affordable housing services in the city.

Some of the programs supporting affordable housing are:

1. CDBG-Minor Repair Program; (12)
2. HOME-Target Rehabilitation Program; (3)
3. HOME-CHDO Rental Acquisition/Rehabilitation/Construction Program (5)
4. CDBG JCIL Accessibility Program (4)
5. Section 108 Loan-Homeowner New Construction in CRA District 2. (1)
6. HOME-Down Payment Assistance (4)

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	25
Special-Needs	4
Total	29

Table 9 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	3
Rehab of Existing Units	22
Acquisition of Existing Units	4
Total	29

Table 10 - One Year Goals for Affordable Housing by Support Type

Discussion

The one-year goals for affordable housing are based upon current funding levels and average of past production/performance levels. The rehabilitation of existing units (not to include CHDO units) estimates housing rehabilitation for approximately 15 housing units. The acquisition & rehabilitation and/or new construction of units would be carried out through certified CHDO agencies (total 5 units). Special needs housing estimates are the number of units anticipated to be modified for disabled homeowners based upon funds available for current year, which is approximately 4 units.

Note: The number of homeless to be supported is zero due to the ESG programs now being administered directly through THDA to the nonprofit agencies rather than the City administering the programs. Homeless services for the community are still provided via Women's Resource & Rape Assistance Program, and Area Relief Ministries, receiving ESG funding directly from THDA. Services provided to the homeless under ESG might be rental assistance, utility assistance, emergency shelter, etc. The JHA also provides housing vouchers for homeless veterans through the HUD-VASH program and Emergency Housing Voucher program.

AP-60 Public Housing – 91.220(h)

Introduction

In consultation with public housing officials, one of the most immediate needs is more affordable housing in the community. Another major issue is obsolete public housing units and a need for replacement. Fortunately, all JHA units whether PHA, HCV, or LIHTC have standards that are strictly enforced by HUD and/or THDA. Each year the Authority works to renovate units of its public housing stock based upon an assets management plan and utilizing a capital fund grant made available to the Authority. This ensures that the units are kept well-maintained and viable as continued public housing stock; and do not contribute to the housing problems/severe housing problems associated city-wide. Many residents under the HCV program struggle with high costs of utility bills, particularly with the older housing stock.

Through the JHA Social Services Department, public housing residents will continue to be served by the Family Self-Sufficiency Program which includes assistance with services in the following areas: Building/restoring credit, Budget development, Asset building, Obtaining GED, Resume preparation, Job preparation, Career development, Post-secondary/Vocational education, etc. Public housing residents are encouraged, if they have achieved a great level of self-sufficiency, to transition into private housing opportunities.

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

The Jackson Housing Authority continues the mission of providing quality housing and supporting services for low and moderate-income persons, which promote upward mobility and a better standard of living. As part of the mission, JHA retains the goal of replacing 50 plus year old, obsolete public housing developments to maintain the quality of affordable housing stock. In its five-year action plan, the JHA indicates the following goals as it pertains to public housing restoration and revitalization:

- Leverage private or other public funds to create additional housing opportunities
- Acquire or build units or developments
- Renovate or modernize public housing units
- Demolish or dispose of obsolete public housing
- Provide replacement public housing

The current condition of public housing properties overall is good. The JHA will continue to try to access available funding in order to maintain viable decent safe sanitary housing.

The JHA Social Services Department is the key agency in improving the living environment of public housing residents through support services and community partners support services referrals. The Family Self Sufficiency Program and the Homebuyer Incentive Programs are the key programs for improving the living environment of public housing residents. The community partners consist of

Workforce Investment Agency; Jackson Madison County Health Department; Jackson Boys/Girls; Regional Inter-Faith Association; local banks; West Tennessee Legal Services; United Way; Financial Empowerment Center; and JHA's Social Services staff.

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

Through the JHA Social Services Department, public housing residents will continue to be served by the Family Self-Sufficiency Program. Public housing residents are encouraged to transition into private housing opportunities. The Self Sufficiency Program has approximately 179 public housing and Housing Choice Voucher (Section 8) residents enrolled.

The Jackson Housing Authority's Resident Advisory Board (RAB) meets regularly to obtain input from residents regarding capital needs and the overall PHA Annual Action Plan for the Housing Authority. Resident involvement will continue to be supported in an effort to enhance the service delivery.

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

The PHA is not designated as troubled.

Discussion

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

Introduction

The City of Jackson remains committed to the goal of reducing homelessness. Strategies are to prevent homelessness, preserve and increase the supply of affordable housing, and deliver appropriate support services to obtain and maintain stable housing. Programs, such as the Continuum of Care Program and the Emergency Solutions Grant, are essential resources for local efforts. The City, along with local non-profit agencies, strives to utilize these resources in the most effective and efficient way possible.

The Jackson/West Tennessee Continuum of Care, Inc. (COC) is primarily responsible for a majority of funding for homeless programs in Jackson. The COC is responsible for coordinating the homeless strategic planning process, managing and coordinating the Point In Time Count (PITC) annually, administering the HMIS system, allocation of SNAP (formerly SHP) funds to homeless provider agencies for chronically homeless individuals and families, administering and coordinating a variety of HUD submissions of required reports, e.g. AHAR, HIC and PITC; and, various volunteer outreach efforts for homeless persons.

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

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

The City participates in the Jackson/West TN Continuum of Care. The CoC maintains the mission to reduce homelessness. Outreach and assessment of homeless persons are a part of that mission. The CoC, in conjunction with the non-profit agency, TN Homeless Solutions, operates the Homeless Hotline and a Coordinated Entry System, which both aim to improve outreach to homeless and provide more effective services. Certain programs, such as PATH, provide outreach case managers for the homeless, particularly the unsheltered population. Area Relief Ministries receives a small percent of outreach funds through the Emergency Solutions Grant.

Addressing the emergency shelter and transitional housing needs of homeless persons

The City retains the goal of the Consolidated Plan to prevent and reduce homelessness within the City of Jackson by supporting programs that offer shelter facilities and beds for the homeless, and by assisting agencies that engage in homeless prevention and service programs. Annually, the CoC conducts a Point-in-Time Homeless Count which documents the extent of homelessness in the community. In addition to other metrics, these reports identify the number of persons or families in emergency shelter or transitional housing. Homeless services such as emergency shelter and transitional housing are

provided by non-profit organizations, including Area Relief Ministries (homeless men), Dream Center (women and children), and WoMen's Resource & Rape Assistance Program (victims of DV).

Some of the non-profit agencies that provide emergency and/or transitional shelter receive Continuum of Care funding, and/or the Emergency Solutions Grant funding that is administered through THDA to provide needed housing services for homeless.

While the goal remains to generate more permanent affordable housing opportunities for the homeless, the City has begun the process to construct a non-congregate homeless emergency shelter for men with the assistance of the CDBG-CV and HOME-ARP funds. It is anticipated that the shelter will be completed by December 2023. As the coronavirus pandemic hit, many single adult homeless males were left without shelter and a safe place to go to help protect against getting the virus.

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

Tennessee Homeless Solutions and Jackson Housing Authority programs are the only Veterans Homeless Programs. THS is active with the SSVF (Supportive Services for Veteran Families) programs which assists with temporary financial assistance to homeless Veterans or Veteran families at risk of being homeless. JHA has teamed up with the Veterans Administration (Memphis) in the issuance of 25 VASH vouchers. As of current (May 2023), 18 VASH vouchers are leased with an additional 6 issued. The JHA also administers 25 Emergency Housing Vouchers for homeless. JHA has applied with HUD to receive six Stability Vouchers for homeless, at risk of homeless, and victims of domestic violence, dating violence, sexual assault, stalking, and human trafficking.

The Community Development Office, CoC, and partner agencies continue to coordinate, identify and work toward meeting the needs of the homeless. The CoC and partner agencies continue to seek additional resources and utilize the HMIS to coordinate efforts. Local nonprofit agencies awarded McKinney-Vento Homeless Assistance funding (Emergency Solutions Grant) through THDA to provide Rapid Rehousing and Prevention services. West TN Legal Services, Inc. offers to homeless persons housing advocacy, counseling etc.

CDBG funds assist Area Relief Ministries with their FreshSTART program endeavors, which provide transitional employment and job history to homeless men with the intention of successful reintegration back into the Jackson community. To address one of the prominent triggers leading to homelessness, FreshSTART works to create transitional work opportunities for the homeless and ARM's housing services participants that both promote dignity by generating income and offer hands-on job skill

training.

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

Effective homelessness prevention requires early identification and assistance to help individuals/families avoid losing their home. Public agencies, including social service agencies, health care providers, schools, the foster care system and city government all have a vital role in this effort as they are often in contact with these households and can provide necessary information and referrals. Strategies with partner agencies to facilitate the early identification and assistance needed to prevent homelessness include 1) expansion of resources available for rental assistance and for key services that address threats to housing stability; and 2) facilitating access to eviction prevention services through education and outreach, expanded legal services, and working to establish specialized eviction prevention programs.

The Rapid Re-Housing program for entry level homeless individuals allows for case management. Case management is essential to moving homeless individuals to the next level of stability. The Rapid Rehousing recommendations will address helping homeless individuals based upon the case management process to be developed. Also, coordination is a continued process with agencies and the West TN Healthcare for homeless persons discharged from hospitals. Jackson Housing Authority and THDA Housing Choice Vouchers are encouraged by the CoC.

Furthermore, the issues addressed earlier in this section address those at risk of becoming homeless, especially those being discharged from health care and mental health facilities. West Tennessee Legal Services serves as the conduit for referral and support assistance (including legal advice on evictions) needed by low-income individuals and families. Also, Southwest Tennessee Human Resources has programs for prevention of homelessness through utility and rental assistance. THS is active with the SSVF (Supportive Services for Veteran Families) programs which assists with temporary financial assistance to homeless Veterans or Veteran families at risk of being homeless.

Discussion

The City will continue to partner with the CoC to participate and support the Continuum of Care process. The Continuum is supported by a variety of non-profit and public homeless service agencies throughout Jackson and West TN that are working directly with the homeless and at-risk homeless on a daily basis.

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

Introduction:

There are many types of barriers to affordable housing including discriminatory practices in renting, leasing, and purchasing, zoning, lack of safe, decent and affordable housing, lack of accessible housing, neighborhood improvements, and education. Fair Housing Laws prohibit discrimination in housing for protected class members. The 2019 Analysis of Impediments (AI) identifies any impediments to fair housing for the City of Jackson and recommends remediation actions for each of the impediments.

Some barriers that were identified in the AI include 1) accessibility to fair housing for special needs populations; 2) concentrated poverty areas; 3) cost burdened residents with housing affordability issues; and 4) development constraints and supply of available land for housing development hampers new affordable housing production. **(See APPENDIX 2 for a list of impediments and actions).**

Affordable housing development is impacted by the limited resources available to acquire land and build affordable housing units or to acquire and renovate affordable housing units. Also, the CDBG and HOME funds have not increased substantially over the years to invest as needed in affordable housing. Non-profit housing developers do not have the financial resources to construct affordable housing without the availability of some type of incentives that would allow for further affordable housing reinvestment into the community.

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

The AI analyzed whether the cost of housing or the incentives to develop, maintain, or improve affordable housing in the City of Jackson are affected by public policies such as land use controls, zoning ordinances, building codes, etc. Review of the city's zoning ordinance and public policies were examined to reveal any current ordinances or policies that might impose barriers to fair housing and affordable housing. No concerns were noted as a result.

The City is committed to removing or reducing barriers to the development of affordable housing whenever possible throughout the City. A variety of actions include, among others, reducing the cost of housing to make it affordable. To achieve this goal, the City 1) provides down payment and closing cost assistance to lower-income homebuyers 2) promotes Federal and State financial assistance for affordable housing.

The non-governmental barriers, primarily market factors such as high land costs, construction costs, and high prevailing market prices for housing, have been the primary challenges facing jurisdictions in the region in the last two years. These barriers are addressed, within the City's limited ability to address them, through the housing activities listed above and through other goals.

The City ensures compliance with the Fair Housing Act and Section 504 of the Rehabilitation Act of 1973 for all new housing construction projects. In addition, the City requires all projects receiving HOME funds to adhere to the requirements of 24 CFR 92.351 and to follow its affirmative marketing procedures and requirements.

Discussion:

In accordance with the AI, the City/CD Office will continue efforts to address impediments to fair housing. Actions involve education and outreach through such programs as fair housing awareness, continued collaboration with financial institutions, etc. **(See APPENDIX 2 for a list of impediments and actions).**

Also, the City/CD Office through its other programs, such as rehabilitation and special housing needs, continues to provide to protected classes the following:

- Housing rehabilitation to greater than 90% minorities
- Accessibility modifications for disabled homeowners & renters
- Housing rehabilitation for female heads of household

For clients the CD Office may encounter with Limited English Proficiency (LEP), the CD Office uses the Language ID Card to identify the language spoken at which point we use the Language Line services to assist with client. The CD Office also, if needed, will utilize services from West TN Legal Services who have a bilingual person on staff.

AP-85 Other Actions – 91.220(k)

Introduction:

The projects and activities outlined in the Annual Action Plan 2023-2024 are aimed at a range of housing and community development needs in Jackson. These projects reflect the commitment of Jackson Housing Authority and its Community Development Office for reducing the number of households in poverty within the city and meeting underserved needs. The Jackson Housing Authority's Community Development Office uses the maximum amount of allowable CDBG funds to assist with community/public service needs including an ongoing commitment to support funding and projects to address homelessness, and the needs of persons with special needs. The continued emphasis on collaboration with other agencies to meet the employment, training and housing needs of those below poverty is a high priority.

Actions planned to address obstacles to meeting underserved needs

The City will address obstacles to meeting the underserved needs by collaborating with other public and private agencies and pursuing funding sources as they become available for specific priority activities. The City, along with its collaborative agencies, will strive to overcome the main obstacles of the underserved by continuing to leverage its resources and partnering with housing and service organizations. It is also necessary to assist households increase their income and assets, which would include public service funding for job readiness and other assistance programs to help individuals secure a job to increase their family income. This would help underserved families build assets by providing financial assistance to income eligible households who otherwise could not afford to purchase a home due to lack of funds for down payment and other fees associated with the purchase.

Making housing and services available to the underserved, including populations with special needs is also a priority. One major obstacle is housing accessibility for elderly to age in place and for disabled to live independently in their homes. The need is to modify their homes for accessibility, e.g. wheelchair ramps, bathroom and kitchen modifications and other universal design standards. The homeowner rehabilitation programs allow for the modification for seniors with disabilities who are approved for rehabilitation work. Coordination and referrals to the Jackson Center for Independent Living for wheelchair ramps for both renters and homeowners is common and funded through CDBG funds. Other disability needs are assessed by JCIL as well. Over 90% of homeowner rehabilitation applications are VLI and LI households who are seniors.

Identified barriers to fair housing in Jackson are lack of knowledge by the public and by members of housing related industries in the fair housing laws and remedies available through such laws. Awareness and outreach to educate the community on the impediments to fair housing will be incorporated into the WTLS contract for the fiscal year 2023-2024.

The Social Services Department will continue to assist public housing and Housing Choice Voucher residents with support services and homeownership opportunities through the Department's Family Self Sufficiency Program and Homeownership Incentive Program. Financial counseling, homebuyer classes and life skills training will assist the residents into a more stable housing condition, and support services will be referred to the Community Partners for the residents. Case management is a major and essential factor in the success of these programs.

Actions planned to foster and maintain affordable housing

There are several programs proposed in the Annual Action Plan that will address housing affordability. These are:

- Build 1 new home (as funding allows) in CRA District 2 with Section 108 funds in a targeted two block area for positive impact in the immediate and surrounding area. This is a partnership with SWHRA, Genesis CDC (CBDO), Jackson Housing Authority and the Jackson Community Redevelopment Agency (CRA).
- Southwest CDC and Healthy Community LLC new construction of 5-6 with THDA funds
- CHDO Rental Acquisition/Rehabilitation/New Construction Program in LMI census tracts.
- Continuation of the Minor Repair and Target Rehabilitation Programs for VLI and LI households and elderly households having high priority.
- JHA Family Self Sufficiency Program and Homebuyer Incentive Program
- JHA LIHTC efforts to replace obsolete housing units.
- JCIL Accessibility Modification for Disabled Persons program
- JHA Housing Choice Vouchers

Actions planned to reduce lead-based paint hazards

The City of Jackson/Community Development does not have a lead-based paint program. However, if the project is not exempt in accordance with EPA/HUD regulations, the City will address lead-based paint issues through its housing programs such as housing rehabilitation and CHDO housing programs, as part of the scope of work for each program. Modifications have been made to these programs, i.e. the CHDO agencies are acquiring and rehabilitating units that will require a LBP test and inspection if the structure was built prior to 1978. The Minor Repair Program/Target Rehabilitation Program and Down Payment Assistance programs have incorporated the LBP regulations as part of the inspection process.

The CD Office maintains compliance with the LBP regulations by requiring the inspection staff person to become certified as a risk assessor and lead-based paint inspector. There remains a shortage of trained LBP workers and contractors in the Jackson area and Memphis LBP contractors are utilized as needed for these rehabilitation programs. Currently, all contractors on the community development contractor list are certified lead renovators.

Actions planned to reduce the number of poverty-level families

The City remains committed to addressing the needs of its residents who live at or below the poverty level. During the Annual Action Plan period from 2023-2024, the City, in conjunction with other public agencies and private non-profit organizations, will continue to pursue resources and innovative partnerships to support the sustainability/development of affordable housing, homelessness, youth services, job training, other economic development, etc. Partners with the City in these anti-poverty efforts include local service agencies such as United Way of West TN who develops the Asset Limited, Income Constrained, Employed (ALICE) Report annually. Other partners include the Jackson Housing Authority and the Jackson/West TN Continuum of Care.

The Jackson Housing Authority operates a Family Self Sufficiency Program which has the goal of promoting economic independence for Public Housing and Housing Choice Voucher participants in the program. Existing opportunities for education, financial fitness, and job seeking assistance are coordinated to assist families in overcoming the barriers which prohibited them from achieving self-sufficiency. Participants in the Family Self Sufficiency work towards setting and obtaining future life and career goals by accomplishing specific activities and objectives, which will in turn uplift them out of poverty.

The City of Jackson operates the Financial Empowerment Center through contract with United Way of West TN to administer the program. The center provides free, one-on-one financial counseling for low-income persons, in particular, that will help to move them out of poverty and into financial stability. The City also has the Jackson Empowerment Task Force that works to fight poverty, inequality, and recidivism.

The Jackson/West TN Continuum of Care, Inc. addresses homelessness on a regional basis. The Jackson Housing Authority continues to support the meetings and activities of the CoC. The CoC's mission is to ensure safe, decent, and affordable housing and services for homeless and at-risk citizens. Meetings of the CoC bring together representatives from a range of organizations to discuss local condition, seek innovative solutions to homelessness and related issues, and advocate for the most disadvantaged in our society. The Jackson/West TN CoC is also the official Continuum of Care organization recognized by HUD.

Actions planned to develop institutional structure

Working within the institutional structure in place, the Jackson/West TN Continuum of Care continues to work towards improved programming to better address homeless needs. As part of conformance to the HEARTH Act, Continuum of Care subrecipients are required to participate in the new Coordinated Access System for all receiving CoC and ESG funding. Participating subrecipients must adhere to the Coordinated Entry (CE) policy and procedures to coordinate and strengthen access to diversion, housing and shelter services for families and individuals who are homeless or at risk of homelessness. The CE

institutes consistent and uniform assessment and referral processes to determine and secure the most appropriate response to each individual and family's immediate and long-term housing needs.

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

The City draws on public and private agencies as resources or partners for housing and community development programs and to better serve the low-income community. These partnering agencies include, but are not limited to the Jackson Housing Authority, the Community Redevelopment Agency, the Continuum of Care and local homeless providers, local nonprofit organizations, financial institutions, affordable housing developers, etc.

The City, through the Community Development program, plans to continue efforts with local nonprofit agencies to bring forth a centralized services center. This would bring service providers to one centralized location for those persons needing assistance for a variety of items including affordable housing, free legal assistance, public assistance, and counseling services.

Discussion:

Program Specific Requirements

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

Introduction:

The following addresses the program specific requirements for the Annual Action Plan. It includes required information for CDBG an HOME.

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(I)(1)

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

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

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	90.00%

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

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

The City does not anticipate utilizing any other forms of investment beyond those identified in Section 92.205.

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

The Homebuyer/Property Owner shall abide by the HOME rules concerning the following:

Affordability Period: The HOME-assisted housing must meet the affordability requirements for not less than the applicable period specified in the following table, beginning after project completion. The per-unit of HOME funds and affordability period that they trigger are described below in the Recapture Provisions.

Recapture Provisions: The recapture requirement is triggered by a sale of the Property (voluntary or involuntary) or cash out refinance of the Property, and there are no net proceeds, or the net proceeds are insufficient to repay the HOME investment due, the Local Government can on recapture the net proceeds, if any. The net proceeds are the sales price minus superior loan repayment (other than HOME funds) and any closing costs. The following option of recapture is:

Reduction during affordability period: If affordability period is five years, the Local Government shall reduce the HOME investment amount to be recaptured to zero at the end of the affordability period. Any sale (voluntary or involuntary) prior to the end of the five-year affordability period, the recapture amount shall be for the full amount of the HOME investment.

If the affordability period is more than five years, the Local Government shall reduce the amount to be recaptured on a prorata basis beginning with the sixth year of the affordability period for the time the homeowner has owned and occupied the housing measured against the required affordability period. Any sale (voluntary or involuntary) prior to the end of five years, the recapture amount shall be for the full amount of the HOME investment. For example, if the affordability period is 15 years, then the prorata basis is mathematically calculated on the remaining ten years of the affordability period (10% annually beginning with the sixth year).

See APPENDICES for full HOME RESALE/RECAPTURE GUIDELINES

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

Cities receiving HOME Investment Partnership Funds are required to comply with a designated affordability period. The affordability period of any project is contingent upon the amount-per-unit subsidy received and may be five, ten, or fifteen years long. Participating jurisdictions are required to utilize the recapture or resale provisions to ensure continued affordability and the wise stewardship of federal funds. The following programs use HOME funds to assist homebuyers, developers, or homeowners; thus, recapture and resale provisions are incorporated in program guidelines: down payment assistance, housing rehabilitation, CHDO new construction and acquisition. Deeds of Trust or Restrictive Covenants are filed to ensure affordability periods are met.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

The City has no plans to utilize HOME funds to refinance existing debt secured by multifamily housing rehabilitated with HOME funds.

5. If applicable to a planned HOME TBRA activity, a description of the preference for persons with special needs or disabilities. (See 24 CFR 92.209(c)(2)(i) and CFR 91.220(l)(2)(vii)).
6. If applicable to a planned HOME TBRA activity, a description of how the preference for a specific category of individuals with disabilities (e.g. persons with HIV/AIDS or chronic mental illness) will narrow the gap in benefits and the preference is needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2)(ii) and 91.220(l)(2)(vii)).
7. If applicable, a description of any preference or limitation for rental housing projects. (See 24 CFR 92.253(d)(3) and CFR 91.220(l)(2)(vii)). Note: Preferences cannot be administered in a manner that limits the opportunities of persons on any basis prohibited by the laws listed under 24 CFR 5.105(a).