

CONSOLIDATED ANNUAL PERFORMANCE & EVALUATION REPORT

CAPER

2024-2025

DRAFT

Community Development Program
Jackson, Tennessee



August 2025

**Jackson Housing Authority
Community Development Office**

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 Jackson is an entitlement jurisdiction that receives funds from the U. S. Department of Housing and Urban Development (HUD) to invest in local solutions that address housing and community development needs. The City receives funding through the Community Development Block Grant (CDBG) program and the HOME Investment Partnership (HOME) program. On June 30, 2025, the City of Jackson completed its fifth and final year of its Five-Year Consolidated Plan (2020-2024). Programs had been established and activated to address the objectives for housing, homelessness, special needs and non-housing needs of the Jackson community. During the program year, the City of Jackson budgeted \$2,844,377 for FY 2024-2025. This budget included new allocations of \$609,474 in 2024 CDBG funds, \$437,999 in B-20 CDBG CARES Act (CV) carryover funds, \$331,138 in 2024 HOME funds, \$1,219,022 in HOME American Rescue Plan (ARP) carryover funds, \$226,744 in HOME reprogrammed funds, and \$20,000 in HOME program income funds. Of the \$2,844,377 that was budgeted, a total of \$898,487 was expended on activities such as housing repair, housing acquisition, public services, public facilities, and economic development. With these funds, a total of 1,956 individuals and 20 households were provided assistance or service.

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	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Expand the capacity of homeless providers	Homeless	CDBG: \$ / HOME: \$0	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	60	59	98.33%	20	12	60.00%
Expand the capacity of homeless providers	Homeless	CDBG: \$ / HOME: \$0	Homelessness Prevention	Persons Assisted	0	26				
Improve quantity and quality of affordable housing	Affordable Housing	CDBG: \$ / HOME: \$	Rental units constructed	Household Housing Unit	0	1		2	0	0.00%
Improve quantity and quality of affordable housing	Affordable Housing	CDBG: \$ / HOME: \$	Rental units rehabilitated	Household Housing Unit	20	5	25.00%	4	1	25.00%
Improve quantity and quality of affordable housing	Affordable Housing	CDBG: \$ / HOME: \$	Homeowner Housing Added	Household Housing Unit	0	1		1	0	0.00%

Improve quantity and quality of affordable housing	Affordable Housing	CDBG: \$ / HOME: \$	Homeowner Housing Rehabilitated	Household Housing Unit	95	82	86.32%	22	19	86.36%
Improve quantity and quality of affordable housing	Affordable Housing	CDBG: \$ / HOME: \$	Direct Financial Assistance to Homebuyers	Households Assisted	10	0	0.00%	2	0	0.00%
Provide a Suitable Living Environment	Non-Housing Community Development	CDBG: \$ / HOME: \$0	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	3070	9346	304.43%	690	1889	273.77%
Provide Expanded Economic Opportunities	Non-Housing Community Development	CDBG: \$ / HOME: \$0	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	300	263	87.67%	60	55	91.67%
Provide Expanded Economic Opportunities	Non-Housing Community Development	CDBG: \$ / HOME: \$0	Homeowner Housing Added	Household Housing Unit	0	0		1	0	0.00%
Provide Expanded Economic Opportunities	Non-Housing Community Development	CDBG: \$ / HOME: \$0	Jobs created/retained	Jobs	3	0	0.00%			

Table 1 - Accomplishments – Program Year & Strategic Plan to Date

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.

All projects supported with Consolidated Plan program funds during the reporting period met the statutory goals of providing decent housing and a suitable living environment and expanded economic opportunities, principally for low and moderate-income persons. CDBG funds were used to address the City of Jackson’s priority needs including rehabilitation of older housing stock, neighborhood revitalization, and public services for low-income families/individuals. The 2024-2025 activities carried out align with the priority needs and goals/objectives as outlined in the Consolidated Plan 2020-2024. The city continually works to use the funds as effectively and efficiently as possible. A breakdown of CDBG and HOME expenditures during the FY 24-25 is provided in attachments-**Table 1**. Homeless activities were carried out through Continuum of Care funded and THDA funded Emergency Solutions Grant agencies, Womens Resource and Rape Assistance Program, TN Homeless Solutions, and Area Relief Ministries. Area Relief Ministries also received CDBG funds to provide job opportunities, training, and job incentives to homeless men.

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
White	447	0
Black or African American	1,372	1
Asian	12	0
American Indian or American Native	9	0
Native Hawaiian or Other Pacific Islander	0	0
Total	1,840	1
Hispanic	75	0
Not Hispanic	1,872	1

Table 2 – Table of assistance to racial and ethnic populations by source of funds

Narrative

Under "Race", the actual total of persons served was 1,873 (CDBG-1,872, HOME-1). The chart above does not reflect a category for "other", which that category total for CDBG would be 48. The Race category for Black or African American includes 91 persons that identify as Black & White.

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	609,474	611,387
HOME	public - federal	577,882	224,003

Table 3 - Resources Made Available

Narrative

On June 30, 2025, the City of Jackson completed its fifth year of its Five-Year Consolidated Plan (2020-2024). Programs were established and activated to address the objectives for housing, homelessness, special needs and non-housing needs of the Jackson community. During the program year, the City of Jackson budgeted \$2,844,377 for FY 2024-2025. This budget included new allocations of \$609,474 in 2024 CDBG funds, \$437,999 in B-20 CDBG CARES Act (CV) carryover funds, \$331,138 in 2024 HOME funds, \$1,219,022 in HOME American Rescue Plan (ARP) carryover funds, \$226,744 in HOME reprogrammed funds, and \$20,000 in HOME program income funds. Of the \$2,844,377 that was budgeted, a total of \$896,487 was expended on activities such as housing repair, housing acquisition, public services, and economic development. With these funds, a total of 1,876 individuals and 20 households were provided assistance or service. Of the CDBG-CV and HOME-ARP funds budgeted for the year, \$33,876 and 29,220 was expended for planning activities respectively.

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
Jackson City-wide	28	31	City-wide
Jackson LMI Census Tracts	42	27	HOME Target Rehab Areas
NEIGHBORHOOD REVITALIZATION STRATEGY AREA (NRSA)	30	42	Section 108 Loan Repay, NRSA Public Services

Table 4 – Identify the geographic distribution and location of investments

Narrative

Section 108 Loan Repay (\$243,158) -Eligible projects for funding through the HUD approved Section 108 Loan. These loan funds were disbursed within the NRSA planning districts, District 1-Center City Project; and District 2-East Jackson Project. The 108 loan proceeds were split 50/50 in the Community Redevelopment Agency's two planning districts.

Genesis CDC/Boys and Girls Club (\$50,000) - After School/Summer Youth Programs sponsored by the

Boys and Girls Club. After school and summer recreational, educational and peer group programs for 120 low and moderate-income youth (100% low/mod benefit) from the East Jackson NRSA. The program was completed on June 30, 2025 and 100% of the funds were expended. This NRSA public service is allowed to exceed the public service cap as part of the CDBO (Genesis CDC, Inc.) with the emphasis that low income parents have a child care safety net for after-school and during school months that enhance their ability for maintaining and training for employment.

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.

The utilization of CDBG and HOME Program funds has had an positive effect on the ability to leverage other resources to aid in addressing the needs of the community. CDBG funds were leveraged by other federal, state, private, and local funding.

To address housing and community development needs, the City leverages its CDBG and HOME entitlement grants with a variety of funding resources in order to maximize the effectiveness of available funds. Public service projects report their leveraging amount. In 2024-2025, the reported leveraged amount provided by public service agencies was \$256,547 from State, local federal and private sources.

	<u>CDBG</u>	<u>Leverage</u>	<u>Total</u>	<u>Percent</u>
Financial Empowerment Center	\$ 22,000	\$128,000	\$150,000	85%
<i>West TN Legal Services</i>	\$ 20,000	\$ 28,547	\$ 48,547	58%
<i>RIFA</i>	\$ 15,000	\$ 75,000	\$ 90,000	83%
<i>SWHRA Youth Program</i>	<u>\$ 22,000</u>	<u>\$ 25,000</u>	<u>\$ 47,000</u>	<u>53%</u>
	\$ 79,000	\$256,547	\$335,547	76%

How HOME matching requirements were satisfied:

The HOME funds are matched each year with surplus match funds from HOME match report, CHDO match funds, and/or private donations and land donations/acquisitions from private and public sectors as applicable. Due to the coronavirus (COVID-19) panedemic, HOME match requirements for FY 2020-2022 were waived. For FYs 2023 and 2024, the city received HOME match reduction due to meeting distress criteria.

Fiscal Year Summary – HOME Match	
1. Excess match from prior Federal fiscal year	360,885
2. Match contributed during current Federal fiscal year	0
3. Total match available for current Federal fiscal year (Line 1 plus Line 2)	360,885
4. Match liability for current Federal fiscal year	0
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	360,885

Table 5 – Fiscal Year Summary - HOME Match Report

Match Contribution for the Federal Fiscal Year								
Project No. or Other ID	Date of Contribution	Cash (non-Federal sources)	Foregone Taxes, Fees, Charges	Appraised Land/Real Property	Required Infrastructure	Site Preparation, Construction Materials, Donated labor	Bond Financing	Total Match

Table 6 – 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 begin-ning 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 \$
0	0	0	0	0

Table 7 – 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	Minority Business Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Contracts						
Dollar Amount	0	0	0	0	0	0
Number	0	0	0	0	0	0
Sub-Contracts						
Number	0	0	0	0	0	0
Dollar Amount	0	0	0	0	0	0
	Total	Women Business Enterprises	Male			
Contracts						
Dollar Amount	0	0	0			
Number	0	0	0			
Sub-Contracts						
Number	0	0	0			
Dollar Amount	0	0	0			

Table 8 - 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-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0	0	0	0	0	0
Dollar Amount	0	0	0	0	0	0

Table 9 – 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						
Parcels Acquired		0		0		
Businesses Displaced		0		0		
Nonprofit Organizations Displaced		0		0		
Households Temporarily Relocated, not Displaced		0		0		
Households Displaced	Total	Minority Property Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0	0	0	0	0	0
Cost	0	0	0	0	0	0

Table 10 – 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.

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	0	0
Number of Non-Homeless households to be provided affordable housing units	25	15
Number of Special-Needs households to be provided affordable housing units	5	5
Total	30	20

Table 11 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	0	0
Number of households supported through The Production of New Units	4	0
Number of households supported through Rehab of Existing Units	22	19
Number of households supported through Acquisition of Existing Units	4	1
Total	30	20

Table 12 – Number of Households Supported

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

During the 2024-2025 program year, the City's JHA-CD Office worked to meet the goal of improving the quality of affordable housing for low- and moderate-income households through its affordable housing programs. As the issue of high cost of construction and acquisition has remained, the CHDO agencies have not been able to balance the cost of building new homes with funding and affordability. They also did not acquire and renovate homes as per the goals set due to high costs to acquire. Also, with the housing repair program, the program has struggled to maintain a pool of contractors, particularly due to

costs and limitations of the program. The program has four contractors with one whose primary trade is HVAC and electrical. Though there are four contractors, two were limited on the projects due to their schedules and other work. The CD Office continually seeks contractors for the program. The CD office also persists with utilizing programs as effectively as possible to increase homeownership opportunities, to provide homeowner repair assistance, and to provide affordable rental housing.

Discuss how these outcomes will impact future annual action plans.

The CD office expects this year’s outcomes to carry forward into future Consolidated Plan years. Based on the current outcomes, housing market trends, and local needs the CD Office will continue to focus on its affordable housing activities to increase availability of affordable housing in the community through rehabilitation of existing units and new construction, while also working to decrease the number of homeless persons. The CD Office will continue CHDO activities for acquisition of existing units to increase the supply of affordable rental housing (JAHO, SWCDC) and homebuyer housing (SWCDC, Habitat for Humanity) for low/moderate income families and individuals.

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	12	0
Low-income	6	1
Moderate-income	1	0
Total	19	1

Table 13 – Number of Households Served

Narrative Information

The data shows, for both CDBG and HOME, the majority of families assisted during the program year were extremely-low and low to moderate income households. This performance is consistent with program goals to provide housing for the lowest income households, as the 2020-2024 Consolidated Plan shows in its Needs Assessment that the extremely-low and low-income groups have the highest level of housing cost burden and severe housing cost burden.

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

A high priority goal for homelessness in the Consolidated Plan is to *“expand the capacity of homeless providers”*. The major objective for the program year remains to provide an adequate homeless services to quickly rapid rehouse unsheltered persons and provide emergency/transitional housing facilities for homeless individuals and families with children. In an effort to reach those who are living unsheltered, homeless providers and outreach resources work together to identify and engage such persons. Strategies addressing this objective include the Coordinated Entry System (CES), the Homeless Hotline, services, and shelter programs.

The City's Community Development program continues to support all activities that help persons/families have access to safe, decent, and affordable housing with the resources necessary to enable individuals and families to be self-sufficient. Through the Continuum of Care's annual Point in Time Count (PITC) and completed surveys of unsheltered persons in January 2025, the City and partner agencies are provided valuable insight and information on homeless persons that are both sheltered and unsheltered. This includes identifying current housing needs, social service needs, veteran's needs, mental and physical health status, etc. The PITC identified 164 unsheltered individuals within the City of Jackson. This number is inclusive of 7 individuals counted in 2 households.

Homeless services are provided primarily by agencies in the Jackson/West TN Continuum of Care network. Some of these agencies receive McKinney-Vento funds to carry out homeless service activities. The Tennessee Homeless Solutions, Inc. (THS) is the primary homeless coordinating agency for the Jackson/West TN Continuum of Care. THS and the Pathways PATH program provide outreach case workers to seek and reach out to homeless individuals across the service area and help to get them into emergency shelter. THS also manages the CES and the Homeless Hotline for homeless persons seeking help through the Continuum. Area Relief Ministries receives Emergency Solutions Grant funding for street outreach efforts as well. The HUD VASH and the Supportive Services for Veteran Families (SSVF) programs are also in place to provide supportive services and outreach to homeless veterans.

Addressing the emergency shelter and transitional housing needs of homeless persons

Referrals for shelter/housing needs are made through the centralized intake, the CES, to direct homeless persons to any available shelter services. The City's Community Development Office continually works with various agencies that provide services and programs to address emergency shelter and transitional housing needs.

- Tennessee Homeless Solutions. THS temporarily provides emergency shelter for the homeless using Emergency Solutions Grant CARES Act funding to lease a hotel.
- Open ARM. Area Relief Ministries' Open ARM is a daytime hospitality and case management center for Jackson's homeless community. ARM case management includes document assistance, medical care vouchers, housing assessments, and transportation assistance.
- Turning Point Safehaven. The Safehaven is a previously funded CDBG project that provides a permanent housing opportunity for chronically homeless men. The SHP Safehaven project provides eight units of permanent housing with common kitchen and bath facilities with no time limit on the occupants. Area Relief Ministries operates this program through McKinney-Vento Supportive Housing Program funds.
- The Dream Center. The Dream Center provides emergency and transitional shelter for women and women with children. The Dream Center offers not only shelter, but GED classes, job readiness, transportation, addiction-recovery programs, financial self-sufficiency classes, parenting, and assistance with finding permanent employment and housing.
- WRAP. WRAP provides counseling, emergency and transitional shelter for domestic violence abuse persons, primarily women. The shelters are in disclosed locations for the safety of the clients.

There are local nonprofit agencies in Jackson that are awarded McKinney-Vento Homeless Assistance funding (Emergency Solutions Grant and/or Supportive Housing Program) through the Continuum and/or THDA to provide emergency shelter and transitional housing case management, employment services, legal services, and other essential services for homeless persons. See above concerning outreach, coordinated entry and assessment efforts.

Rapid Re-housing efforts are continuous through agencies that receive ESG and/or SHP funding. Agencies such as THS, WRAP, and ARM provide Rapid Re-housing programs to get homeless persons out of shelters or off of the street and into a permanent housing situation.

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

A critical strategy for ending homelessness is to prevent the onset of homelessness. Collaborative efforts with agencies are continual to prevent homelessness of very low/low income persons, particularly those being discharged from care facilities or institutions. Utilizing the Coordinated Entry System also assists in helping homeless persons to access resources as quickly and efficiently as possible. The Homeless Hotline is also in place for quick and coordinated referral to proper agencies for services.

West TN Legal Services (WTLS) Homeless Referral programs provide homeless prevention services such as tenant-landlord mediation services and legal services to prevent eviction. Other activities involve the extensive technical assistance to the social service agencies involved in the Jackson/West TN Continuum of Care (CoC) and those programs.

Southwest Human Resource Agency has the Low Income Home Energy Assistance Program (LIHEAP) which offers assistance with utility bills to eligible families. This project is funded through the U.S. Department of Health and Human Services and the Tennessee Housing Development Agency. There are two components of the program: Regular and Crisis Assistance. The Crisis Assistance is available to eligible families in danger of disconnection of utilities and service is provided in a fast track manner to prevent homelessness.

Tennessee Homeless Solutions provide case management, which involves employment assistance, benefits assistance, housing, health, and other social service needs as it may pertain to the individual client. THS also manage the Coordinated Entry System and Homeless Hotline.

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 the 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. Jackson Housing Authority administers Stability Vouchers and Fair Share Vouchers to assist with homelessness.

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

Continuum of Care planning remains a vital part in the transition to permanent housing and independent living. Because not everyone who is homeless has the same level of need, it is important to partner with various agencies to provide necessary supportive and wrap around services. Through the continued partnership with Jackson/West TN Continuum of Care, various regional, rural county and urban organizations have consolidated and coordinated their homeless assistance efforts in order to develop a Continuum of Care strategy for the 23-county area. JHA CD Office participates with the CoC in a variety of ways, including the Continuum's Board of Directors. The CoC network and board meet at least quarterly.

Funding was approved for the FY2024 \$4,781,320 Continuum of Care grant for twenty-five projects in the West Tennessee CoC Network region. This included thirteen projects for the Jackson community in

the amount of \$2,146,843. Two of the projects for Jackson are Rapid Rehousing projects. ***See attachment 3 for a list of approved projects.*** Some of these projects have a case management piece, along with PATH case management, which helps to identify gaps in clients' life, skills, and support networks to better connect them to the appropriate resources (i.e., job skills training, mental health and substance abuse treatment, GED classes, etc.).

Local nonprofit agencies such as Area Relief Ministries and Women's Resource & Rape Assistance Program are awarded McKinney-Vento Homeless Assistance funding (Emergency Solutions Grant) through THDA to provide Rapid Rehousing and/or Prevention services.

Programs are also in place for veterans. Tennessee Homeless Solutions (THS) and West Tennessee Legal Services (WTLS) operate the Supportive Services for Veteran Families Program (SSVF). The primary goals of the SSVF program are to assist families transitioning from homelessness to permanent housing and prevent at-risk families from becoming homeless. The Jackson Housing Authority administers 31 vouchers under the HUD-VASH program to move veterans and their families out of homelessness. The case management services are designed to improve the veteran's physical & mental health, life skills, and financial budgetary skills to remain in stable permanent housing.

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

Actions taken to address the needs of public housing

In its five-year action plan, the Jackson Housing Authority indicates the following goals as it continues efforts to maintain decent, safe and affordable housing as it pertains to public housing restoration and revitalization:

- Expand the supply of assisted housing
- Improve the quality of assisted housing
- Increase assisted housing choices
- Provide as improved living environment
- Promote self-sufficiency and asset development of assisted households

The Jackson Housing Authority has a total of 437 public housing units of which one of the oldest remaining developments is in need of revitalization. The nonprofit entity of the JHA, Tennessee Housing Development Corporation, has begun construction on a “Twinning” deal from Tennessee Housing Development Agency, which consists of a 4% Multi-family Tax Exempt Bond deal and a 9% Low Income Housing Tax Credit deal. The 4% Bond funds are being used to demolish the current Allenton Heights public housing development and construct a 58 one-bedroom units on Allenton Heights site. The 9% LIHTC funds are being used to construct 54 two- and three- bedroom units on an adjacent site. One hundred of the new units will be converted from public housing to project based voucher assisted units. The remaining twelve will be straight low income housing tax credit units. JHA will continue to seek funding for revitalization or rehabilitation of the remaining housing development, Lincoln Courts, as outlined in the PHA Annual Plan.

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, and sanitary housing. JHA continues to work with development partners to assist in converting public housing units to RAD. If necessary, the conversion will include Low Income Housing Tax Credits. Capital Fund Program (CFP) monies are utilized to continue making improvements on the existing properties as well. The current CFP projects underway include exterior upgrades for Rosewood Gardens and Allenton Annex developments that have a senior preference. The upgrades include roof and gutter replacement, shutters, doors, etc. JHA continues to improve the quality of housing by using the CFP funding to make moderate improvements to the public housing units.

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

The JHA encourages public housing residents to participate in policy, procedure and program implementation and development through its Resident Advisory Board (RAB). The RAB is an elected Board representing all of the public housing residents. The RAB serves as an organized spokesperson for

the resident body to present resident concerns to the authority and to participate and provide feedback on the Public Housing Agency 5-Year and Annual Plan, policy revisions, and the development of any resident programs on behalf of the residents.

JHA administers a Family Self-Sufficiency Program (FSS) for public housing and HCV participants to assist them with the goal of promoting upward mobility, homeownership, etc. The program's purpose is to support families to complete goals in education, job-training, employment, entrepreneurial and homeownership with emphasis on employment, and credit readiness. For participants that become homeowners, HOME funds for down payment assistance are available to eligible public housing and HCV residents. The Self Sufficiency Program remains nearly full with approximately 178 public housing and housing choice voucher residents enrolled.

JHA was awarded HUD grant funding for the Jobs Plus Initiative program for the Lincoln Courts public housing development. This program allows JHA to target public housing developments that have low employment rates with concentrated employment-related services. The goal of the program is to encourage and support families in meeting their economic goals

Actions taken to provide assistance to troubled PHAs

The Jackson Housing Authority is not classified as a "troubled" PHA. Hence, no action is necessary to assist the JHA in that area.

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)

Based upon the review completed under the Analysis of Impediments to Fair Housing Choice, there are no potential issues in regard to public policies with particular attention to zoning, land use controls and building codes. However, enacting Inclusionary Zoning or Incentivized Zoning regulations to help generate more affordable housing to deconcentrate poverty areas would possibly reduce growth limitations on the supply of affordable housing within the city. The City and partners feel there is a need for the state to amend the law passed in 2018 that basically banned cities from using inclusionary zoning to build or preserve affordable housing. If this was reversed, it would aid in the objective to increase Jackson's affordable housing supply.

The mission of the City of Jackson's Housing Commission is to develop a comprehensive strategic housing plan for the City of Jackson, TN, with an emphasis on affordable and attainable housing supply production and preservation. The Commission works in partnership with the Mayor's Office and City Council to implement policies and programs.

A major limiting factor to affordable housing remains to be the cost of new construction and rehabilitation. Incentives for housing developers to build affordable housing is limited. The age of housing and condition of the housing makes costs unaffordable to many lower income households. The City/CD program continues to provide CDBG and HOME funding for housing rehabilitation. Other partner agencies also offer housing repair assistance to low income households. Under the City's building codes, the City/CD Office ensures compliance with the Federal Fair Housing Act and Section 504 of the Rehabilitation Act of 1973 for any eligible activities for CDBG and HOME funding. Efforts are continual to educate the public and city leaders regarding barriers to affordable housing through outreach with its partner organizations.

Other barriers that were identified include 1) limited Special Needs housing and services; 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. Staff, along with local housing providers and developers, continue to work together to identify and implement actions that encourage and increase the production of affordable housing.

In addition, all projects receiving HOME funds must adhere to the requirements of 24 CFR 92.351 on affirmative marketing. Affirmative marketing steps consist of actions to provide information and otherwise attract eligible persons in the housing market area to the available housing without regard to race, color, national origin, sex, religion, familial status, or disability.

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

Actions taken to address obstacles to meeting underserved needs include prioritization of projects through the citizen participation process. There is a general lack of funding resources available to support public and private agencies who serve the needs of low-to-moderate-income residents and special needs groups. The City continues to work with the community and non-profit agencies to develop plans to address the underserved population, which includes leveraging of other funds with CDBG and HOME funds.

Results from the community engagement process and data analysis show that housing, supportive services and community development needs remain high. Lack of knowledge by the public and by members of housing related industries in the fair housing laws and remedies available through such laws is an obstacle. West TN Legal Services continues to work on the identified barriers to fair housing in Jackson. Also, the City contracts with United Way of West TN to manage the Financial Empowerment Center, which offers free, professional, and one-on-one financial counseling as a new public service to residents.

The JHA's Social Service Department continues to work with public housing and housing choice voucher residents with support services and homeownership opportunities through the Family Self Sufficiency Program. Financial counseling and life skills training are ongoing with the residents to aid in moving them into more permanent housing conditions. Any further support services are referred to the Community Partners for the residents. Case management is a major and essential factor to the success of these programs.

The JHA's Jobs Plus Initiative works with public housing residents to assist with upward mobility by providing necessary supportive services and resources for employment opportunities to non-employed residents. The Jobs Plus Initiative is designed to increase employment and earnings for residents of public housing. It also includes incentives like income disregards to encourage and support working families.

The City has a decreasing supply of affordable housing. While this primarily affects very low- and extremely low-income households, it is also beginning to affect low-income households, especially larger households in the 60% - 80% AMI range. The City's Housing Commission is reviewing incentive programs for affordable housing development and zoning reform. The City helps address the underserved needs through the CDBG and HOME program homeownership and rehabilitation activities. Financing availability continues to be an obstacle in addressing the underserved needs of residents. The private sector must play a key role in making up for the loss of declining government funding. The City continues its partnerships with the Jackson Housing Authority, local nonprofits, banks, etc. The Jackson Housing Authority and/or its entities continue to seek funding for affordable multi-family housing units through Low Income Housing Tax Credits, HOME funds, private loans, etc.

Seniors want to age in place or live in their homes as long as possible before they have to seek assisted

living shelter and services, continues to be an underserved need. The major obstacle is the need to modify the homes for accessibility, e.g. wheel chair ramps, bathroom modifications, etc. Through the homeowner rehabilitation programs the CD Office works to provide needed modifications for seniors with disabilities. Also, installation of wheel chair ramps for both renters and homeowners, through coordination with the Jackson Center for Independent Living agency, is funded through CDBG funds.

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

The Jackson Community Development Program administers housing programs such as the homeowner rehabilitation programs, rental rehabilitation, and first-time homebuyers' assistance programs. Any housing units that utilize CDBG or HOME funding are required to comply with HUD's Lead Safe Housing Rule. The Minor Repair Program/Target Rehab Program and Down Payment Assistance programs have incorporated the LBP regulations as part of the inspection process. The City provides information on lead-based paint to each affordable housing program participant.

The Jackson Housing Authority also has two EPA certified risk assessors and lead-based paint inspectors on staff. Also, contractors and other industry related professions associated with the CD Office and Jackson Housing Authority programs are required to be certified as lead renovators.

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

The City/CD Office collaborated with agencies to continue efforts to reduce the number of families and individuals living in poverty. A primary focus was on supporting programs that raise household incomes and stabilize housing situations. Through coordination with other agencies and sources such as CDBG, HOME and McKinney-Vento funding, programs were maintained that provide job creation, affordable housing retention, and rental assistance. Social services agencies also were vital in providing supportive services to poverty-level families.

The Jackson Housing Authority has actively supported families through various initiatives aimed at reducing the number of poverty-level households. Over the past three years, JHA has hosted multiple Family Expos and Resource Fairs. These free community events were designed to promote employment opportunities, encourage healthy lifestyles, and connect families with essential support services within the community.

Reducing the number of poverty-level families includes continued and increased funding for programs that provide down payment assistance for income eligible homebuyers, affordable housing retention (homeowner rehabilitation), job creation/retention, and rental assistance. Some of these vital programs are:

- JHA's Self Sufficiency Program and Jobs Plus Program for public housing residents.
- At-Risk & Disabled Youth Summer Employment and Skills Training Program
- Rapid Re-housing (CoC) analysis of enhanced and coordinated program delivery especially with

homeless persons with immediate housing needs.

- Aging-In-Place efforts for elderly/disabled by making accessibility modifications. Seeking other resources other than the CDBG and HOME rehabilitation program is necessary for the programs to continue.
- Homeless Programs (McKinney Vento)

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

The City continually works to strengthen its relationships with an extensive number of agencies which include non-profit and for-profit organizations, affordable housing developers, businesses, economic development and workforce development organizations, lenders, and healthcare providers that worked toward implementing the goals of the Consolidated Plan 2020-2024 and Annual Action Plans. The City of Jackson's Building & Codes Department and Planning Department are also vital in the institutional structure of the programs. Also, the Jackson/West TN CoC, the lead agency of the Continuum of Care, implemented programs such as coordinated entry and improved policies and procedures on homeless programs that aided in better addressing homeless needs.

The CD Office will continue to utilize federal, state, and local resources and work in partnership with public and private entities to achieve common goals of providing affordable housing, shelter and services for the homeless and low- income individuals, and improve neighborhoods.

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

To enhance coordination between the public, private housing, health, and social service agencies throughout the Action Plan process, the CD Office coordinated with a variation of organizations, including agencies such as Community Redevelopment Agency, Southwest Human Resource Agency, Jackson Housing Authority, Southwest CDC, Jonah Affordable Housing Organization, Boys & Girls Club, as well as private industries. These collaborative efforts not only enhance the coordination of services among agencies but also helps reduces duplication of services. The annual citizen participation process also provides opportunities for stakeholders to coordinate and share feedback on any issues, needs, and concerns.

There are online systems in place (HMIS) for referral and coordination administered by Tennessee Homeless Solutions. THS also operates the homeless hotline for West Tennessee. The Jackson/West TN Continuum has implemented the Coordinated Entry System that quickly identifies, assesses, refers, and connect persons to housing and assistance based on their needs. The connections through these services also allow for enhanced coordination between agencies.

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

City of Jackson, through the Jackson Housing Authority, plays an active role in fair housing, the provision of affordable and accessible housing, and promotion of homeownership. The City seeks to reduce impediments to fair housing choice for persons protected under the federal Fair Housing Act. Protected classes include race, color, religion, sex, disability, familial status and national origin. The Analysis of Impediments to Fair Housing Choice was updated in 2024 to reflect the latest observed impediments.

The Community Development Office contracts with the West Tennessee Legal Services, Inc. to provide affirmative and fair housing referral, education, and counseling. The programs included components of fair housing compliance and homeless prevention. These efforts also include working close with CRA initiatives with local lending institutions, homeownership programs, homeless programs and technical assistance to other non-profit housing organizations.

WTLS also receives the Fair Housing Initiatives Program (FHIP) grant to provide full service, broad based comprehensive fair housing enforcement services in the city of Jackson to all protected classes with special emphasis on education and enforcement service delivery to underserved populations. During the period of July 1, 2024 – June 30, 2025, there were 42 total discrimination cases open at WTLS. Thirty-eight cases alleging discriminatory housing practices were reported to the Fair Housing Project in Jackson, Tennessee. Of these 42 cases, 22 alleged discrimination based upon disability. Additionally, of these 42, 10 related to domestic violence and/or sexual harassment. With market/issue, there were 62 markets/issues in which discriminatory housing practices were alleged to have occurred. Of the 62 markets/issues in which discriminatory housing practices were alleged, 38 occurred in rental situations; 3 in advertising with the alleged making of a discriminatory statement/publication and/or discrimination to the complainant; 7 with conduct prohibited under 42 U.S.C. §3617; and 9 with reasonable accommodation requests.

The current economic and political climate and an escalating widening of the gap between growing needs and funding to meet these needs has caused the CDBG/HOME funding to become even more vital in serving the needs of low and moderate income Jackson residents. The funds have been utilized in assisting homeowners in dwelling retention, ensuring affordable housing for renters, referral to homebuyer education programs, providing fair housing education and representation, and in assisting persons who are victims of predatory lending practices through representation and community education. The City of Jackson through its other programs, such as rehabilitation and special housing needs provided the following: Housing rehabilitation to 93% minorities and accessibility modifications for 5 disabled homeowners. For clients the CD Office may encounter with Limited English Proficiency (LEP), the CD Office has available Language ID Card to help identify the language spoken, then at that point we would utilize the Language Line services to assist with client.

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

The CD Office conducts monitoring of sub-recipients on an ongoing basis of CDBG and HOME activities. Projects are monitored during the program year through the use of sub-recipient progress and financial reports as well as project site visits. Subrecipients on the average are monitoring at least once every three years. Files are reviewed, notes are compared and a letter stating the results of the monitoring visit is sent to the sub-recipients. Any sub-recipient and CHDO organizations that have been identified as high risk from desk top monitoring receive full monitoring annually until their status is no longer considered high risk.

All projects receive at least one of the three types of monitoring:

- Individual technical assistance—Ongoing contact with the sub-recipient to provide guidance in order to prevent potential issues and ensure compliance with Federal regulations.
- Desktop – Review of sub-recipients’ progress and annual reports, financial audits, invoices, etc. This type of monitoring enables the CD Office to analyze information such as accomplishments, expenditures and compliance which help determine the need for additional technical assistance or future on-site visits.
- On-site –On-site monitoring visit to review compliance with the CDBG and/or HOME regulations, overall management, financial records, etc. The monitoring consists of interviews with key staff as well as a review of applicable records.

Participation of minority and women business enterprises is encouraged. This effort includes notices in bid solicitation, newspaper advertisements and contract clauses requiring contractors, to the greatest extent feasible, to provide opportunities for training and employment. The City also complies with Section 3 of the Housing and Urban Development Act of 1968 and implementing regulations at 24 CFR Part 75.

The comprehensive planning requirements include the community planning and development process of the 5-Year Consolidated Plan, subsequent Annual Action Plans, and CAPERs. Citizen participation is a vital part of the consolidated plan process, and the City follow its HUD approved Citizen Participation Plan which helps guide staff to gather community input which is an essential component in identifying the priority housing and community development needs in the City.

Citizen Participation Plan 91.105(d); 91.115(d)

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

The Citizen Participation Plan states that the CAPER will be made available through distribution and public review and comment for at least 15-days prior to completion and submission to HUD no later than 90 days after the close of the program year. Citizens are given a minimum of 15-day period in which to comment on the CAPER. A summary of all comments received, if any, will be included in the CAPER as an attachment.

The notice of the CAPER availability was published for a 15-day public comment period beginning August 15, 2025 through August 29, 2025. The advertisement was published in the Examiner News website and hard copy newspaper. The CAPER was also made available for public review and comments in the the Jackson Housing Authority central office, JHA's website, and the JHA Community Development Office. The public hearing is set for August 22, 2025 to present the CAPER to the public for review and comment.

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.

There were no changes in program objectives and goals as a result from its experiences. While the actions taken are contingent upon the yearly input of the public via the City's Citizen Participation Plan, no changes have been warranted.

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

No

[BEDI grantees] Describe accomplishments and program outcomes during the last year.

CR-50 - HOME 24 CFR 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 24 CFR §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.

The Community Development Office staff inspects HOME units for compliance subject to period of affordability requirements as required in §92.504(d). Projects are reviewed for rent requirements, income determination, management, affirmative marketing, tenant selection policies, property performance and maintenance. Tenant files are reviewed and inspections of units are completed during on-site monitoring. The Villages of Old Hickory II RAD conversion/moderate renovation project was completed March 2024. Inspection of these units was Spring 2025. Condition of units and grounds was good. Baker's Place apartments are scheduled to be monitored Fall 2025. The CHDO agencies will be monitored Spring 2026.

- TVOH Multi-family Project (10 HOME units)
- Baker's Place Apartments (10 HOME units)
- JAH0, Habitat, & SWCDC CHDO- single family rental/homeowner units

Provide an assessment of the jurisdiction's affirmative marketing actions for HOME units. 24 CFR 91.520(e) and 24 CFR 92.351(a)

In accordance with 24 CFR 92.351, the Community Development Office adheres to affirmative marketing procedures and requirements for HOME assisted housing. Each HOME funded sub-recipient is required to follow established affirmative marketing requirements and practices, such as the use of fair housing logos, use of community contacts, Equal Housing Opportunity logotype, the display of fair housing posters, etc. In all advertising for HOME projects, use of the Equal Housing Opportunity logotype or slogan is also included.

The Community Development Office contracts with the West Tennessee Legal Services, Inc. to provide affirmative and fair housing referral and counseling. These efforts also include working close with CRA initiatives with local lending institutions, homeownership programs, homeless programs and technical assistance to other non-profit housing organizations with fair housing issues. Affirmative marketing for housing developed with HOME assistance is included as a requirement in HOME sub-recipient agreements. They must develop an affirmative marketing plan and use it in their tenant selection process, as applicable. Requests for contractor qualifications for rehabilitation program contractor lists are advertised and minority & women contractors are encouraged to apply. Qualified MBE and/or WBE contractors are included on lists of qualified contractors.

Refer to IDIS reports to describe the amount and use of program income for projects, including the number of projects and owner and tenant characteristics

The City allocates available program income annually as part of all estimated HOME resources. Any program income is generated from HOME rehabilitation loan repayments and payments for a multi-family construction loan. No program income was disbursed during FY 2024.

Describe other actions taken to foster and maintain affordable housing. 24 CFR 91.220(k) (STATES ONLY: Including the coordination of LIHTC with the development of affordable housing). 24 CFR 91.320(j)

In FY 2024, the City accomplished the following in an effort to maintain affordable housing:

- CHDO Housing Initiatives. Jonah Affordable Housing Organization acquired and rehabbed one affordable 3-bedroom rental home.
- Minor Repair Program: The Minor Repair Program is a city-wide housing program designed to address critical code violations, and/or minor repair problems. A maximum grant of \$4,999 per homeowner was established; and, assistance is provided by a loan, grant or a combination of both. Change orders up to \$2,500 are allowed if determined as necessary during the construction phase and approved by the Executive Director. This process has resulted in 14 minor repair cases being completed during the program year at a total cost of \$106,195.
- Jackson Center for Independent Living- The Jackson Center for Independent Living continues to provide accessibility for disabled homeowners/renters. During the program year, 5 extremely low and moderate income person was provided access to their homes for a total cost of \$21,971. The types of improvements performed were wheelchair ramp installations. Other interior accessibility modifications are referred to the Minor Repair Program.
- Housing Choice Voucher Program- The Jackson Housing Authority had approximately 1,566 Housing Choice Voucher allotments. Of these, approximately 86% were leased as of June 30, 2025. The HCV program has worked with owners/landlords to obtain more affordable housing units on the HCV program.

CR-58 – Section 3

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

Total Labor Hours	CDBG	HOME	ESG	HOPWA	HTF
Total Number of Activities	0	0	0	0	0
Total Labor Hours	0	0			
Total Section 3 Worker Hours	0	0			
Total Targeted Section 3 Worker Hours	0	0			

Table 14 – Total Labor Hours

Qualitative Efforts - Number of Activities by Program	CDBG	HOME	ESG	HOPWA	HTF
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 3 business concerns.					
Technical assistance to help Section 3 business concerns understand and bid on contracts.					
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 15 – Qualitative Efforts - Number of Activities by Program

Narrative

During the program year 2024-2025, there were no Section 3 projects. The City will enforce the Section 3 rule as it applies to all federally funded construction contracts.