

City of Murfreesboro Second-Year CAPER 2016-17



... creating a better quality of life

July 1, 2016 – June 30, 2017

Prepared by
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The City of Murfreesboro does not discriminate on the basis of race, color, national origin, religion, sex, familial status or disability in the admission or access to, or treatment or employment in, its federally assisted programs or activities.

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has been designated to coordinate compliance with the nondiscrimination requirements contained in the Department of Housing and Urban Development's (HUD) regulations implementing Section 504 (24 CFR Part 8, dated June 2, 1988), Section 3 (24 CFR Part 135, dated October 23, 1973, Use of Small and Disadvantaged Businesses and Hiring Lower Income Residents of the Project Area), Equal Employment Opportunity Act of 1978 (In House Equal Employment Opportunity), Executive Order 11246, as amended by Executive Order 11375 (Equal Employment Opportunity on Federal Assisted Construction Contracts), Executive Order 11625 (Minority Entrepreneurship), Title VI of the Civil Rights Act of 1964, 49 CFR Part 21, dated June 18, 1970, and Title VIII of the Civil Rights Act of 1968 as amended by Fair Housing Amendment Act of 1988.



City of Murfreesboro First-Year CAPER 2015-16

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CR-05 - Goals and Outcomes

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

After consulting with an extensive array of stakeholders, reviewing results from surveys covering housing needs, non-housing needs and homelessness needs, and reviewing the 30-year history of the CDBG program in Murfreesboro, the City identified affordable housing, public services, homelessness and fair housing as its highest priorities. During the program year covered by the Second-Year Action Plan, the City met or exceeded its goals in most of its programs.

The City receives its Emergency Solutions Grant funding from the Tennessee Housing Development Agency. The City’s Consolidated Plan projected a total of \$1,120,238 being available for the five years covered by the plan. During the first program year, THDA revised its funding philosophy. The City now can only project a total of \$796,582 being available and most of the remaining funding will be allocated to shelter operations.

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)

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Acquisition	Affordable Housing	CDBG: \$304,081	Rental units rehabilitated	Household Housing Unit	10	8	80.00%	2	5	250.00%
Acquisition	Affordable Housing	CDBG: \$50,132	Homeowner Housing Added	Household Housing Unit	5	1	20.00%	1	0*	0.00%
Administration	Administration	CDBG: \$137,063	Other	Other						
Affordable Housing	Affordable Housing	CDBG: \$123,115	Direct Financial Assistance to Homebuyers	Households Assisted	60	19	31.67%	10	10	100.00%

CITY OF MURFREESBORO, TENNESSEE

Emergency Shelter , Rapid Rehousing and HMIS	Homeless	Emergency Solutions Grant: \$157,994	Homeless Person Overnight Shelter	Persons Assisted	1000	1728	172.80%	350	380	108.57%
Fair Housing	Fair Housing	CDBG: \$1,000	Other	Other						
Housing Rehabilitation	Affordable Housing	CDBG: \$177,581	Homeowner Housing Rehabilitated	Household Housing Unit	30	18	60.00%	6	14	233.33%
Public Service Grants	Non-Housing Community Development	CDBG: \$113,100	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	25000	4499	18.00%	4000	2420	60.50%

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

* Acquisition – Homeowner Housing Units Added - Two homes were built on lots acquired for Rutherford County Habitat for Humanity, but both households were also assisted with funds from the Affordable Housing Program and are included in that count.

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

The City's CDBG allocation for the second year of the 2015-20 Consolidated Plan was \$719,401, a 3.1% drop from the previous year and reflecting a four-year downward trend. Other funds available for CDBG projects was a carry-over of \$332,262.35 from the 2015-16 program year and program income of \$126,656.78. Tennessee Housing Development Agency (THDA) provided the City an Emergency Solutions Grant of \$169,113, a 20.2% drop from the previous year. ESG funds were allocated to subrecipients who used funds to serve the homeless and those in danger of becoming homeless.

Affordable housing is the City's highest priority and 73.2% of available CDBG funds were invested in housing-related activities. Fourteen owner-occupied single-family homes were rehabbed; 10 first-time homebuyers were assisted with loans to help cover down payments and closing costs. The City assisted Greenhouse Ministries purchase two duplexes and Doors of Hope a single-family residence. These units will be used to provide affordable rental housing to households with incomes at or below 50% of the AMI. The City also assisted Rutherford County Area Habitat for Humanity purchase a building lot which was then subdivided and two single-family homes constructed and then sold to low-income families.

More than 2,400 residents of Murfreesboro received services provided by one of 13 agencies which received CDBG Public Service Grants. The total expenditure for the activities (\$113,099.86) was 14.34% of the total CDBG funding available for public services.

Homelessness is also a high priority. Two Public Service Grant activities (Doors of Hope and The Journey Home) provided services to homeless or previously homeless clients. The City expended \$169,113.26 of the ESG funds made available by THDA. Shelter operations accounted for 82.9% of ESG expenditures. Rapid re-housing accounted for 2.3% and 8.1% of available funding was used to provide Homeless Management Information System (HMIS) services for the Murfreesboro/Rutherford County Continuum of Care.

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
White	1,658
Black or African American	602
Asian	48
American Indian or Alaskan Native	9
Native Hawaiian or Other Pacific Islander	2
American Indian/Alaskan Native & White	7
Black or African American & White	25
American Indian/Alaskan Native & Black/African American	1
Other	68
Total	2,420

Hispanic	326
Not Hispanic	2,094

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

Narrative

An analysis of the above total shows that 68.5% of the persons assisted were white; 24.9% were African-American; 2 % were Asian; and 4.6% identified as American Indian, Pacific Islander, Other, or multi-racial.

The 2015 ACS 5-Year Estimates report 75.3% of Murfreesboro’s population is white; 16.5% African-American; 3.7% Asian; and 4.5% as American Indian, Pacific Islander, Other, or multi-racial.

Of the 2,420 persons served, 13.5% identified themselves as Hispanic while 86.5% identified themselves as Not Hispanic. The 2015 ACS 5-Year Estimates report the population of the city as 5.5% Hispanic and 94.5% Not Hispanic.

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	HUD	\$1,178,320	\$ 915,338
Emergency Solutions Grant	Tennessee Housing Development Agency	\$ 169,179	\$ 169,113

Table 3 - Resources Made Available

2016-17 CDBG Allocation	\$ 719,401
CDBG Carry-Over	\$ 332,262
Program Income	\$ 126,657
Total CDBG Available	\$ 1,178,320

ESG Agency	Shelter	Rapid Re-Housing	HMIS	Admin	Total
Domestic Violence Program	\$ 33,907.40		\$ 546.30		\$ 34,453.70
Doors of Hope	\$ 22,776.94				\$ 22,776.94
Murfreesboro Housing Authority			\$13,235.26		\$ 13,235.26
Room In The Inn	\$ 2,450.48				\$ 2,450.48
Salvation Army	\$ 50,077.88				\$ 50,077.88
The Journey Home	\$ 31,031.13	\$ 3,968.87			\$ 35,000.00
City of Murfreesboro				\$11,119.00	\$ 11,119.00
Totals	\$140,243.83	\$ 3,968.87	\$13,781.56	\$11,119.00	\$169,113.26

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
Citywide	100%	100%	Although Community Development Block Group regulations allow grantees to target specific areas, the City of Murfreesboro chooses to use its funding citywide. This has been the City's policy since becoming a CDBG entitlement more than 30 years ago and Housing Needs Survey respondents overwhelmingly endorsed continuing this approach.

Table 4 – Identify the geographic distribution and location of investments

Narrative

Investments through the City's Affordable Housing Assistance Program (first-time homebuyer assistance) and Housing Rehabilitation Program are driven by demand, rather than geography. Nevertheless, income caps for both programs, the availability of affordable housing stock for sale and the age of homes needing rehabilitation and neighborhood demographics tend to focus investments in the City's core census tracts: 414.01, 414.02, 414.03, 416, 417, 418, 419 and 421.

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.

Public service grant subrecipients were required to provide a dollar-for-dollar match. All subrecipients met or exceeded the match requirement. Match requirements were met in a number of ways including agency cash, in-kind contributions, and volunteer hours.

First-time homebuyers receiving assistance through the Affordable Housing Program are required to provide a minimum of 1% of the purchase price using their own funds.

Two agencies purchased existing housing units to be used as rental property for households with incomes less than 50% of the area median income. The Grant Recipient must agree to match a minimum of 25% of the purchase price. This match may be satisfied in a number of ways:

- a) an equity position in the house;
- b) cash value of any materials purchased
- c) by the Grant Recipient or donated to the Grant Recipient for rehabilitation;
- d) cash value of contracted services (except supportive services) related to the property;
- e) in-kind value of volunteer hours related to the property.

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	19	29
Number of Special-Needs households to be provided affordable housing units	0	0
Total	19	29

Table 5 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	0	0
Number of households supported through Production of New Units	1	2
Number of households supported through Rehab of Existing Units	6	14
Number of households supported through Acquisition of Existing Units	12	13
Total	19	29

Table 6 – Number of Households Supported

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

After missing its goal in PY2015, the Housing Rehab Program exceeded its goal for PY2016.

The Affordable Housing Program missed its goal. The biggest problem facing the Affordable Housing Program is a dearth of available units in price ranges affordable to low/mod home buyers. Two homeowners received assistance through the program to purchase new homes built by Rutherford County Habitat for Humanity on lots purchased using the City's Acquisition Program.

One of the agencies participating in the Rental Acquisition Program was able to acquire two duplexes which allowed the City to produce five units of affordable rental housing rather than the goal of two.

Discuss how these outcomes will impact future annual action plans.

Goals set in the Third-Year Action Plan for housing-related units are:

Rehab	12
Affordable Housing	12
Acquisition	
Homeowner	1
Rental	2
Total	27

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.

Housing Related Activities

Number of Households Served	CDBG Actual
Extremely Low-income	5
Low-income	16
Moderate-income	8
Total	29

Table 7 – Number of Households Served

Non-Housing Related Activities

Number of Persons Served	CDBG Actual
Extremely Low-income	1,630
Low-income	473
Moderate-income	130
Total Low-Mod	2,233
Non-Low-Mod (>80%)	187
Total Beneficiaries	2,420

Narrative Information

Because Murfreesboro is not a HOME PJ, it uses CDBG to fund its housing activities. Although affordable housing is a high priority for the City, this source of funding is a limiting factor since production of new housing units is not an eligible CDBG activity.

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

Homeless services in Murfreesboro are provided primarily by agencies and organizations affiliated with the Homeless Alliance of Rutherford County (HARC), a 501(c)3 corporation that serves as the deliberative body for the Murfreesboro/Rutherford County Continuum of Care (TN-510). The Community Development Director is the Mayor's designee on the HARC Executive Committee. The Rutherford County Mayor and Murfreesboro Housing Authority's executive director also hold permanent seats on the Executive Committee.

Though not a direct recipient of Emergency Solutions Grant funding, the City did receive \$169,113, a 24.5% reduction from the previous year, in ESG funding from the Tennessee Housing Development Agency. Grants to the City's four shelters totaled \$140,244 to assist with emergency shelter operations.

HARC member agencies established and in varying degree met the following goals for PY2016-17:

- To continue developing an integrated service-delivery system to provide housing and services for those who are homeless or at imminent risk of becoming homeless;
- To prevent involuntary homelessness with a range of "housing-focused" solutions (accompanied by supportive services) ranging from emergency shelter housing to affordable home ownership;
- Develop, maintain, and publicize a network of services for those who are homeless or in danger of becoming homeless; and
- Educate and engage the community to enrich their understanding of the homelessness and make people aware of the services that our community provides to the homeless (and ways they can help).

The City provided ESG funding to Murfreesboro Housing Authority (\$13,235) to assist with the cost of operating the Continuum's Homeless Management Information System. The Homeless Coalition of Chattanooga administers HMIS for TN-510 through an agreement with MHA. This arrangement resulted in an immediate improvement in the quality of data, allowing agencies to assess individual needs and design an appropriate plan for providing services.

HARC's Service Delivery Working Group worked throughout the program year on

developing a coordinated entry system designed to meet HUD requirements and a new system is expected to be in place before HUD's January deadline.

Addressing the emergency shelter and transitional housing needs of homeless persons

Homeless shelters operated by Room in the Inn and The Salvation Army were available throughout the year, but Room in the Inn ceased operations in late June 2017. Working with HARC and the City, the Salvation Army added bed capacity for beginning in July 2017 that will cover the single beds lost. The two lost family rooms will be made whole for the short-term by The Salvation Army using ESG funds to place families with children in motel rooms whenever its four family rooms are at capacity.

Domestic Violence Program operates a shelter for victims of domestic violence but no longer operates a transitional housing program. The Journey Home, First Baptist Church, St. Paul's Episcopal Church and Murfreesboro Rescue Mission partner in Coldest Nights, a seasonal program which reaches out to the unsheltered homeless on nights when low temperature are forecast. The Way of Hope operates a program for unaccompanied women and women with children. Sites rotate among participating churches. Greenhouse Ministries offers a transitional housing program funded through the HUD Continuum of Care program.

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

In Murfreesboro/Rutherford County, the Rutherford County Health Department, Primary Care/Hope Clinic, St. Thomas Rutherford Hospital, St. Louise Clinic, and Greenhouse Ministry's Nursing Center provide health care for homeless persons. The VA Tennessee Valley Health Care System, Pathfinders, and The Guidance Center provide addiction treatment services, and Alcoholics Anonymous and Narcotics Anonymous are available.

The Guidance Center's PATH Program helps the homeless who suffer from severe and persistent mental illness to receive health and mental health services, obtain

and maintain an income, and locate appropriate housing. Trustpoint provides in-patient facilities and services for mentally ill patients.

Rutherford County government, which is responsible for running the jail and workhouse, recognizes the role its facilities can play in creating homelessness . The County has established a mental health court and a veterans court and continues its support of a drug court. Also, faith-based organizations, such as the Doors of Hope, have programs geared toward reducing recidivism.

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

Currently the Tennessee Valley Healthcare System offers several programs to assist homeless and displaced veterans including Veterans Affairs Supportive Housing (VASH), a long-term intensive case management program for homeless veterans. Eligible Veterans receive housing choice vouchers allocated specifically to veterans. This voucher is used to subsidize the cost of housing based on the veteran's income. Veterans receive direct and indirect assistance with case management services, such as life skill training, advocacy, clinical assessment and referrals, support and linkage to and coordination with community providers and/or resources. Murfreesboro Housing Authority partners with TVHS to administer 60 VASH vouchers for use in Rutherford County. The utilization rate for VASH vouchers remains near 100%.

Murfreesboro Housing Authority administers 54 special purpose vouchers for the disabled. Funding for this program comes through HUD's Continuum of Care housing program for permanent supportive housing (formerly known as Shelter + Care). The Guidance Center is MHA's partner in this project and provides support services to voucher holders.

The Continuum recognizes that a supporting homeless families with children represents a serious gap in available services. At year's end, community leaders were working with Family Promise to explore starting a branch of this national organization in Murfreesboro.

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

Actions taken to address the needs of public housing

Units are being modernized with available Capital Funds. Many of the needs of public housing continue to go unmet due to the lack of funding provided to the public housing program. No funding available for additional units, capital funds continue to be cut making it hard to keep the units up-to-date.

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

A Resident Advisory Board is established and meets to address changes in policy and HUD mandates. Funding for home ownership is encouraged for people paying flat rents and the City of Murfreesboro programs offering Down payment Assistance is shared with them.

Actions taken to provide assistance to troubled PHAs

Murfreesboro Housing Authority is not designated as a troubled PHA.

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

Actions taken to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment. 91.220 (j); 91.320 (i)

The phenomenal growth of Rutherford County over the last two decades – since 1990, Murfreesboro has grown from a community of 44,922 to an estimated 131,947 in 2016 – has resulted in a similar growth in raw land costs and governmental costs for infrastructure, services and school construction. In the 1990’s Rutherford County imposed a development fee on all new residential construction, the proceeds of which are used primarily for school construction. The Rutherford County Commission has expressed no interest in rescinding this fee since the cause for it has not gone away. The City of Murfreesboro imposes a storm water fee on all new development to help pay for its federally mandated stormwater program. Both have a negative effect on the cost of new construction that affects the supply of affordable housing.

After working with a consultant for the last three years, the City Council approved a new comprehensive plan, *Murfreesboro 2035*, that looks at policies, planning and other factors. Community Development Department staff was used as a resource for housing issues, particularly those affecting the supply of affordable housing, and much of their input was incorporated into the Housing chapter of the report. Staff was also used as a resource on two smaller land-use studies in qualified census tracts prepared for the Planning Department.

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

As part of the consultation process for the 2015-2020 Consolidated Plan, the City conducted a number of surveys and worked with various stakeholders to identify underserved needs in the community. Services for the homelessness were identified as underserved needs and the City’s actions to address these needs are identified in section CR-25 of this report.

Other underserved needs identified include services for youth and elderly. The City addressed these needs to the extent possible given CDBG’s 15% cap for public service activities. Assistance for the the elderly included public service grants to St. Clair Senior Center (\$6,00) and Mindful Care (\$6,000). Assistance for youth included public service grants to Boys & Girls Clubs of Rutherford County (\$7,500),

Discovery Center (\$1,150), The Family Center (\$7,500), Youth Can! (\$14,000) and Kymari House (\$10,800). Both youth and elderly received services from health care programs that received public service grants (Hope II Clinic - \$16,224, Interfaith Dental - \$10,000, and Lutheran Services of Tennessee - \$5,926.38).

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

When the owner-occupant or the prospective purchaser of a pre-1978 house applies for the Housing Rehabilitation Program or the Affordable Housing Program, the Community Development Department orders a lead assessment and risk analysis at no cost to the applicant.

For rehabilitation projects, the owner-occupant is given a copy of the report and any hazards identified are addressed in the Scope of Work. Clearance by the assessor must be issued before the contractor is paid for the project.

For the Affordable Housing Program, copies of the report are provided to both the seller and the buyer. Any hazards identified must be addressed before the City closes the loan.

The City uses the services of AAT Inc. to provide lead-based paint assessments and clearances for all pre-1978 houses receiving assistance through the City's Housing Rehabilitation Program and Affordable Housing Program. During the program year, seven lead assessments were conducted, all for the Housing Rehab Program. The City closed no loans for pre-1978 homes through the Affordable Housing Program.

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

The City continued its relationship with Rutherford County Area Habitat for Humanity, assisting it in acquiring property in Census Tract 419 on which two new homes were constructed. One was sold to an extremely-low income family and the other to a low-income family. Both homeowners also received principal reduction loans through the Affordable Housing Program.

The City helped Doors of Hope purchase a single-family home and Greenhouse Ministries purchase two duplexes. The agencies will be using the units to provide affordable rental housing for households with incomes below 50% of AMI for a minimum of 10 years.

Through CDBG Public Service Grants:

- Hope II Clinic and Interfaith Dental helped provide medical and dental services at little or no cost to 1,398 clients, 215% of whom were low-income and 68% very-low-income;

- Youth Can!, a division of Mid-Cumberland Human Resources Agency, provided supportive services to assist 31 low/mod income students (26 of whom were extremely-low income) stay in school or workforce development programs;
- The Journey Home was able to employ four very-low income persons to work in its Journey Works garden program;
- Doors of Hope provided educational, medical and other support services to 120 formerly incarcerated extremely-low-income persons; and
- Domestic Violence Program assisted 242 extremely-low-income victims of domestic abuse by providing them support services such as transportation for employment or a job search.

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

The City of Murfreesboro, through its Community Development Department, is the lead entity for implementing the 2015-20 Consolidated Plan and the annual Action Plan. The Department works closely with other departments in City government, particularly Building & Codes, Finance, Planning, Parks & Recreation, Police, Transportation, Communications, Water Resources, and Legal.

The City is actively engaged with the Continuum of Care and has a seat on the Executive Board of the Homeless Alliance of Rutherford County (HARC), the CoC's deliberative body. The City received an ESG grant from the Tennessee Housing Development Agency.

In addition to its partnerships with public service subrecipients, the Department also has strong working relationships with community organizations such as Habitat for Humanity, Rutherford County Chamber of Commerce, United Way of Rutherford and Cannon County, Main Street and Middle Tennessee State University.

The primary gap in the delivery system is private sector participation. A primary focus of the HARC's Membership and Advocacy Working Group continues to address this issue.

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

The Murfreesboro Community Development Department is an active participant in the Homeless Alliance of Rutherford County (HARC), the Housing Equality Alliance of Tennessee and the Tennessee Affordable Housing Coalition. The City is also the Collaborative Applicant for the Murfreesboro/Rutherford County Continuum of Care (TN-510).

Additionally, the Department works with its public service subrecipients – 13 in

PY2016 – to encourage and coordinate partnerships between these agencies and organizations, as well as seeking out new partners. The City also partners with the Rutherford County Chamber of Commerce to recruit and retain jobs for its residents. The Community Development Director also sits on the boards of the Emergency Food and Shelter Board, Tennessee Affordable Housing Coalition, and Community Helpers.

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

The longstanding policy of the City of Murfreesboro is to affirmatively further fair housing. To that end, the City is actively engaged in activities which promote fair housing and which facilitate handling of complaints when they arise.

In FY2009, in conjunction with the development of its new Five-Year Strategic Plan, the City commissioned an Analysis of Impediments to Fair Housing Choice. The report, which has been recognized nationally for its excellence, offers a number of recommendations which the City began implementing in FY2010 and continues to implement. The report may be viewed on the City website:

(http://www.murfreesborotn.gov/uploadedFiles/government/Community_Development/Fair_Housing/Murfreesboro%20TN%20AI%202010%20Final%20Report.pdf).

Chapter 5 of the AI identifies impediments and offers recommendations that have become the City's road map for action.

Murfreesboro's *Analysis of Impediments to Fair Housing Choice 2010* includes a detailed analysis of the city's racial composition, a synopsis of which is found in the Second-Year Action Plan. In conjunction with the 2015-2020 Consolidated Plan, the City Council reaffirmed its support of the 2010 AI and approved a Supplement updating all tables and figures with the most recent data available. This action addresses Impediment #8 in the 2010 AI. This support continued through the adoption of the Second-Year and Thrd-Year Action Plans.

The Community Development Department shares the research and data in the City's two fair housing documents with other City departments, the city and county school systems, the Murfreesboro Housing Authority, the local real estate community and the local property management association to help inform housing-related policy decisions. A copy of the 2015 Supplement is available for review on the City website:

(<http://www.murfreesborotn.gov/DocumentCenter/View/2268>).

Impediment #9 recommends revising its "well-intentioned" but "rarely ... applied" fair housing ordinance to make it relevant and useful. This was done in June 2016 and fully implemented in PY2016. The amended ordinance directs the City's Fair

Housing Officer to review complaints and refer them to the Tennessee Fair Housing Council, the Tennessee Human Rights Commission or HUD. The rationale behind the change is that these organizations have considerable expertise in fair housing law and investigative capabilities that the City does not possess.

The one complaint received in PY2016 was referred to the Tennessee Fair Housing Council, which, in turn, notified the City it was already aware of the complaint and that it was being handled by HUD.

Recommendations to address Impediments #1-6 (Private Sector Impediments) encourage the City to develop public-private partnerships to engage the entire community in fair housing efforts. As part of its commitment to addressing these issues, the City was a founding member of the Housing Equality Alliance of Tennessee (HEAT) which was established as a nonprofit corporation in December 2013 for the purpose of promoting equal housing opportunity throughout Tennessee. The organization formalized a coalition of agencies that had sponsored the statewide Fair Housing Matters Conference held each April for the last decade.

Sharing the City's commitment to housing equality, the Murfreesboro-based Middle Tennessee Association of REALTORS was also founding member of HEAT. The Department promotes the conference locally with both mailings and through the City website. The city's subrecipients, particularly those involved in housing-related activities, are encouraged to attend. Staff members from the City's Legal, Planning, Administration and Community Development departments also attend the annual conference.

Staff from the City's Community Development Department, Planning Department, and Legal Department has attended – and will continue to attend – training opportunities offered by HUD, HEAT, West Tennessee Legal Services, and the National Community Development Association.

During PY2016, Community Development Department staff concentrated on preparing to effectively use HUD's new Affirmatively Furthering Fair Housing tool in conjunction with preparing its 2020-2025 Consolidated Plan. Murfreesboro Housing Authority plans to partner with the City in that effort.

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

CDBG regulations hold the grantee responsible for ensuring that all funds entrusted to it are used in accordance with all program requirements. The City of Murfreesboro and the Community Development Department take this responsibility very seriously and apply the principles of good stewardship to themselves as well as to subrecipients and contractors.

The Community Development Department recognizes the need for a continuing focus on technical assistance and monitoring. All subrecipients are monitored at least once during the program year by the Community Development Department's Grant Coordinator. Standards and procedures for local monitoring are adapted from HUD's Community Planning and Development Handbook (Handbook 6509.2), with particular emphasis on insuring programs meet a national objective and subrecipients are properly documenting income eligibility. Exhibit 3-3 in the handbook is the model for the City's subrecipient monitoring forms.

During the program year covered by this report, the City had 13 CDBG subrecipients. The Grant Coordinator made six on-site field visits with exit conferences. These visits were followed up with letters to subrecipients summarizing the results of the visit. The Grant Coordinator conducted desk audits for the balance of the public service subrecipients. Technical assistance is provided throughout the year as appropriate and additional visits are scheduled as needed.

The City's outside auditor samples a number of Community Development Department files annually for compliance with City, State and Federal rules and regulations. The most recent audit reported no findings or concerns for the Community Development Department.

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

The City's Citizen Participation Plan is posted on the City website: <http://www.murfreesborotn.gov/DocumentCenter/View/16>.

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

The Consolidated Plan, annual Action Plans and CAPER are all posted on the City website. The City's Information Officer sent a press release to all local media announcing this availability and opportunity for comment. Copies of the proposed CAPER were available for review on the website, at Community Development Department office and at City Hall at the office of the Mayor.

Any comments received from the public during the comment period will be included as an attachment to this report.

CR-45 - CDBG 91.520(c)

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

The City made one change to its program objectives during the period covered by the Second-Year Action Plan. The plan provided funding for ADA improvements to be made in selected public facilities and funds were spent to pay for planning and engineering. However, no contracts were let for projects during the program year.

The City reimbursed its HUD line of credit for planning and engineering expenses, then reallocated the total to Acquisition and Housing Rehabilitation. Both of these uses fit with the City's commitment to affordable housing.

Microenterprise was included in the 2015-20 Consolidated Plan primarily as a placeholder in case the City decides to reactivate its dormant program at some time during the period covered by the Plan. One of five microenterprise loans made in a previous year was paid off in 2016. The remaining four loans remain open and non-performing and are unlikely to be repaid because of business failures. This experience suggests it is unlikely the City will reactivate the program given reduced CDBG funding levels and demands from other programs.

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

No