

# Program Year 2015 Action Plan

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# AP-15 Expected Resources

## Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder of ConPlan \$
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	
CDBG	Public - Federal	Acquisition, Admin and Planning, Economic Development, Housing, Public Improvements, Public Services	\$10,303,957	\$400,000	\$16,600	\$10,720,557	\$41,215,828
HOME	Public - Federal	Acquisition, Homebuyer Assistance, Homeowner Rehab, Multifamily Rental New Construction, Multifamily Rental Rehab, New Construction for Ownership, TBRA	\$2,324,788	\$300,000	\$0	\$2,624,788	\$9,299,152
ESG	Public - Federal	Conversion and Rehab for Transitional Housing, Financial Assistance, Overnight Shelter, Rapid Re-Housing (rental assistance), Rental Assistance, Services, Transitional Housing	\$927,151	\$0	\$0	\$927,151	\$3,708,604

HOPWA	Public - Federal	Permanent Housing in Facilities, Permanent Housing Placement, STRMU, Short Term or Transitional Housing Facilities, Supportive Services, TBRA	\$576,546	\$0	\$0	\$576,546	\$2,306,184
CoC	Public - Federal	Overnight Shelter, Rapid Re-Housing (rental assistance), Services, Transitional Housing	\$9,000,000	\$0	\$0	\$9,000,000	\$36,000,000
Lead-Based Paint Hazard Control Grant	Public - Federal	Homeowner Rehab, Multifamily Rental Rehab	\$800,000	\$0	\$0	\$800,000	\$3,200,000
Department of Energy – Weatherization /LIHEAP	Public - Federal	Homeowner Rehab, Multifamily Rental Rehab	\$500,000	\$0	\$0	\$500,000	\$2,000,000
Choice Neighborhoods Planning Grant	Public - Federal	Admin and Planning	\$425,000	\$0	\$0	\$425,000	\$0
Section 8	Public - Federal	Rental Assistance	\$75,426,000	\$0	\$0	\$75,426,000	\$301,704,000
HOME match	Public - Local	Acquisition, Homebuyer Assistance, Homeowner Rehab, Multifamily Rental New Construction, Multifamily Rental Rehab, New Construction for Ownership, TBRA	\$523,077	\$0	\$0	\$523,077	\$2,092,308

ESG match	Private, Public - Local	Financial Assistance, Overnight Shelter, Rapid Re-Housing (rental assistance), Rental Assistance, Services, Transitional Housing	\$927,151	\$0	\$0	\$927,151	\$3,708,604
Section 108 Loan	Public - Federal	Housing, Economic Development	TBD	TBD	\$0	TBD	TBD
Community Services Block Grant (CSBG)	Public - Federal	Public Services	\$1,553,782	\$0	\$0	\$1,553,782	\$6,215,128

**Table 1 - Expected Resources – Priority Table**

**Narrative Descriptions of Funding Sources:**

**CoC:** Continuum of Care (CoC) is a HUD program designed to promote communitywide commitment to the goal of ending homelessness. The coordinating agency for the Louisville CoC is the Coalition for the Homeless.

**Lead-Based Paint Hazard Control Grant:** The Lead-Based Paint Hazard Control (LHC) grant program is a competitive HUD grant used for the identification and control of lead-based paint hazards in eligible privately owned housing.

**Department of Energy Weatherization/LIHEAP:** Competitive funding program which provides weatherization improvements, such as insulation and other energy-related home repair, for low income households.

**Choice Neighborhood Planning Grant:** LMHA-administered funds will be used to create a transformation plan for the Russell neighborhood in West Louisville.

**Section 8:** The Section 8/Housing Choice Voucher program is the federal government's major program for assisting very low-income families, the elderly, and the disabled to afford decent, safe, and sanitary housing in the private market.

**HOME Match:** Louisville Metro Government provides cash match as required for HOME funds.

**ESG Match:** ESG subrecipients must provide 100% match, which is often in the form of in-kind rather than cash match. Louisville Metro provides match for administration and rapid re-housing funds where necessary.

**Section 108 Loan:** Section 108 is the loan guarantee component of the Community Development Block Grant (CDBG) Program. The Section 108 loan guarantee program allows local governments to transform a small portion of their CDBG funds into federally guaranteed loans large enough to pursue physical and economic revitalization projects capable of renewing entire neighborhoods. Metro is exploring options for use of the Section 108 loan program in West Louisville.

**CSBG:** Federal funds dispersed by the U.S. Department of Health and Human Services intended to alleviate the causes and conditions of poverty in communities. Metro's CSBG funds are administered by the Department of Community Services.

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

Louisville Metro Government is committed to leveraging federal funds with the intent of maximizing the impact of its programs addressing the Priority Needs listed in section SP-25, which include Affordable Housing, Non-Housing Community Development, Homeless Services, Small Business Development, and Non-Homeless Special Needs.

Local public funds will be used to meet match requirements for ESG and HOME funds where applicable. Each ESG subrecipient is required to provide matching funds equal to its individual ESG allocation. The one-to-one ESG match requirement can be fulfilled using cash contributions, other agency grants, donated supplies to the agency, and so forth. The source of ESG match is required on all fully executed contracts between Louisville Metro Government and the awarded homeless service agency. Matching funds are documented by the Louisville Metro Department of Community Services.

Federal funds such as those awarded to Louisville Metro through the Lead-Based Paint Hazard Control Grant program and Department of Energy Weatherization/LIHEAP provide supplemental resources for home rehabilitation programs, which allows more entitlement funds to be directed toward other housing activities such as the development of new affordable units.

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

Louisville Metro Government is partnering with Seed Capital KY to develop a Metro-owned parcel on the western side of Louisville into the FoodPort, a project identified in the Vision Louisville plan. According to Seed Capital KY's website, the FoodPort project is a food-centric economic and community development engine that will create jobs for West Louisville residents, enhance the built environment and green space of surrounding disinvested neighborhoods, enable existing small businesses to grow, increase farmers' income as they increase their market channels, enable new food businesses to take their first steps, and provide educational opportunities around food and agriculture. The FoodPort concept is unique, and incorporates co-locating existing businesses along the local food supply chain in a collaborative model, leveraging the assets of each to gain scale and efficiency in aggregating and distributing local food, while also allowing each of the businesses to focus on its individual operations,

goals, and objectives. This model offers the potential to realize significant growth in the local food economy by providing infrastructure support to businesses that are poised for growth and already have relationships with regional farmers.

The project represents a potential \$50 million+ investment in West Louisville that will bring 200 permanent jobs, of which nearly two thirds are new, as well as 275 temporary construction jobs. The project site is located at the intersection of the Russell, Shawnee, and Portland neighborhoods, with plans to transform the 24-acre brownfield into a seed-to-waste food chain where food is grown, harvested, processed, sold, eaten, and even disposed into a bio-digester to be converted to methane gas and returned to the energy stream. Along each step of this process, members of the Louisville community have a chance to work, learn, nourish, commune, and invest in their own futures and that of their city.

The FoodPort will be located at 3029 West Muhammad Ali Blvd, formerly the National Tobacco site, within the Russell neighborhood in Kentucky's Third Congressional District (zip code 40212). Dating to the 1890s, the site was used for tobacco warehousing to prepare the product for manufacturing, established at a time when the tobacco industry was growing in Louisville. Louisville is well-situated geographically, with proximity to many local farms in Kentuckiana, as well as regional transportation infrastructure that disperses agricultural products. The site itself is also well-situated to take advantage of its geography, with easy access to the interstate and main thoroughfares of the city.

## AP-20 Annual Goals and Objectives

### Goals Summary Information

	Goal Name	Start Year	End Year	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Expand Homeownership Opportunities	2015	2019	Metrowide	Affordable Housing	CDBG: \$400,000	Homeowner Housing Added: 16 Household Housing Unit
2	Clearance of Vacant or Abandoned Structures	2015	2019	Metrowide	Non-Housing Community Development	CDBG: \$652,600	Buildings Demolished: 60 Buildings
3	Provide Rapid Re-Housing for Diversion	2015	2019	Metrowide	Homeless Services	ESG:  \$267,200	Tenant-Based Rental Assistance / Rapid Rehousing: 70 Households Assisted
4	Increase and Retain Affordable Units	2015	2019	Metrowide	Affordable Housing	CDBG: \$1,000,000  HOME: \$2,370,900	Rental Units Constructed: 100 Household Housing Unit  Rental Units Rehabilitated: 50 Household Housing Unit  Homeowner Housing Added: 10 Household Housing Unit

5	Improve Existing Owner-Occupied Units	2015	2019	Portland NRSA Shawnee NRSA Russell Metrowide	Affordable Housing	CDBG: \$3,443,928	Homeowner Housing Rehabilitated: 200 Household Housing Unit
6	Micro-Enterprise Technical Assistance	2015	2019	Portland NRSA Shawnee NRSA Russell Metrowide	Small Business Development	CDBG: \$169,600	Businesses Assisted: 100 Businesses Assisted
7	Micro-Enterprise Development	2015	2019	Portland NRSA Shawnee NRSA Russell Metrowide	Small Business Development	CDBG: \$250,000	Businesses Assisted: 25 Businesses Assisted
8	Small Business Development	2015	2019	Portland NRSA Shawnee NRSA Russell Metrowide	Small Business Development	CDBG: \$157,472	Businesses Assisted: 3 Businesses Assisted
9	Provide Rental Assistance	2015	2019	Metrowide	Affordable Housing  Homeless Services	HOME: \$400,000	Tenant-Based Rental Assistance / Rapid Rehousing: 50 Households Assisted
10	Provide Homeownership Counseling Services	2015	2019	Portland NRSA  Shawnee NRSA  Russell Metrowide	Affordable Housing	CDBG:  \$80,160	Public Service Activities for Low/Moderate Income Housing Benefit: 1640 Households Assisted

<b>11</b>	Provide Improvements to Public Facilities	2015	2019	Portland NRSA  Shawnee NRSA Russell Metrowide	Non-Housing Community Development	CDBG: \$1,310,000	Public Facility or Infrastructure Activities Other than Low/Moderate Income Housing Benefit:  10000 Persons Assisted
<b>12</b>	Remove Barriers for Persons with Disabilities	2015	2019	Metrowide	Non-Homeless Special Needs	CDBG: \$175,000	Other:  100 Other
<b>13</b>	Provide TBRA to Persons with HIV/AIDS	2015	2019	Metrowide	Non-Homeless Special Needs	HOPWA: \$180,000	Tenant-Based Rental Assistance / Rapid Rehousing: 24 Households Assisted
<b>14</b>	Provide Supportive Services to Persons with HIV/AIDS	2015	2019	Metrowide	Non-Homeless Special Needs	HOPWA: \$276,500	Other:  750 Other
<b>15</b>	Provide STRMU to Persons with HIV/AIDS	2015	2019	Metrowide	Non-Homeless Special Needs	HOPWA: \$64,005	Other:  160 Other
<b>16</b>	Provide Homeless Prevention Services	2015	2019	Metrowide	Homeless Services	ESG: \$45,000  CDBG: \$20,000	Homelessness Prevention: 220 Persons Assisted
<b>17</b>	Provide Street Outreach for Homeless Citizens	2015	2019	Metrowide	Homeless Services	ESG: \$94,100	Other:  200 Other

18	Shelter Operations & Case Management for Homeless Citizens	2015	2019	Metrowide	Homeless Services	CDBG: \$1,525,400  ESG: \$456,300	Public service activities other than Low/Moderate Income Housing Benefit:  15000 Persons Assisted
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Table 2 – Goals Summary

## Goal Descriptions

1	<b>Expand Homeownership Opportunities</b>	
	Description	Louisville Metro plans to expand opportunities for homeownership and deconcentrate poverty through its Shawnee and Portland Homeownership Incentive and Downpayment Assistance Programs.
2	<b>Clearance of Vacant or Abandoned Structures</b>	
	Description	Metro eliminates blight and encourages neighborhood stabilization through selective demolition of vacant or abandoned structures. Lots previously occupied by dilapidated structures can be returned to productive uses.
3	<b>Provide Rapid Re-Housing for Diversion</b>	
	Description	Metro provides rapid re-housing assistance to citizens who are at risk of homelessness or recently homeless to divert them from the shelter system and help them achieve housing stability.
4	<b>Increase and Retain Affordable Units</b>	
	Description	Metro plans to increase the number of affordable rental and owner-occupied units and rehabilitate existing units through its Affordable Housing Development Program and support to CHDOs.
5	<b>Improve Existing Owner-Occupied Units</b>	
	Description	Louisville Metro assists owner-occupants of single family homes through its Emergency and Exterior Repair and Weatherization Assistance programs. Additionally, Metro funds homeowner rehabilitation activities in designated NRSAs.
6	<b>Micro-Enterprise Technical Assistance</b>	
	Description	Louisville Metro helps local micro-enterprises start, sustain, or grow through training, workshops, and technical assistance to income-eligible business owners.
7	<b>Micro-Enterprise Development</b>	
	Description	Metro recognizes that for many low to moderate income entrepreneurs, starting a new business and securing traditional business financing is difficult. Metro provides loans to help create or expand micro-enterprise businesses.
8	<b>Small Business Development</b>	
	Description	Metro will provide loans to small businesses to support economic development efforts.
9	<b>Provide Rental Assistance</b>	
	Description	Metro provides Tenant-Based Rental Assistance to extremely low- and low-income households to prevent homelessness.
10	<b>Provide Homeownership Counseling Services</b>	
	Description	Metro provides homeownership and foreclosure prevention counseling services to assist income-eligible persons in purchasing or retaining owner-occupied units.

11	<b>Provide Improvements to Public Facilities</b>	
	Description	Louisville Metro supports renovations and/or improvements for Metro-owned parks and community centers, nonprofits, and other eligible public facilities and infrastructure.
12	<b>Remove Barriers for Persons with Disabilities</b>	
	Description	Louisville Metro funds a ramp/accessibility program to remove physical barriers that impede independent living for persons with disabilities.
13	<b>Provide TBRA to Persons with HIV/AIDS</b>	
	Description	Metro provides Tenant-Based Rental Assistance and permanent housing placement to income-eligible persons with HIV/AIDS.
14	<b>Provide Supportive Services to Persons with HIV/AIDS</b>	
	Description	Metro utilizes HOPWA funds to provide supportive services for persons with HIV/AIDS and their families.
15	<b>Provide STRMU to Persons with HIV/AIDS</b>	
	Description	Metro provides Short-Term Rent, Mortgage, and Utility assistance and hotel vouchers to income-eligible persons with HIV/AIDS and their families.
16	<b>Provide Homeless Prevention Services</b>	
	Description	Metro provides homeless prevention services, including eviction prevention assistance, to citizens who are at risk of homelessness.
17	<b>Provide Street Outreach for Homeless Citizens</b>	
	Description	Louisville Metro funds street outreach services targeted to youth and medically fragile homeless persons.
18	<b>Shelter Operations &amp; Case Management for Homeless Citizens</b>	
	Description	Metro provides operational support for emergency shelters and case management services for homeless citizens.

## AP-35 Projects

Louisville Metro has identified the following projects for Program Year 2015, which are intended to address the goals described in the previous section.

Project Name
HOME Tenant Based Rental Assistance (TBRA 2015)
Residential Programs Delivery
Homeownership Incentive Program
Ramp and Barrier Removal
Residential Repair
Relocation
Clearance
Microenterprise and Small Business Development
Public Facilities and Improvements
HOME Affordable Housing Development
ESG15 Louisville
CDBG Admin & Planning
HOPWA Housing Assistance and Supportive Services
HOPWA Administration
HOME Administration
Public Services

## AP-50 Geographic Distribution

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

With the exception of funds set aside for NRSA activities, activities that provide direct client services will be available to qualifying individuals and families on a metro-wide basis. Activities that qualify on a low- and moderate-income area basis will be available in the qualifying census tracts.

Louisville Metro intends to provide continued support to the Shawnee (approved by HUD in September 2013) and Portland (approved by HUD in April 2011) NRSAs. The Shawnee and Portland NRSAs were selected based on public input during the 2010-2014 Consolidated Plan process. The proposed Russell NRSA coincides with the award of a Choice Neighborhoods Planning Grant for the neighborhood in January 2015, which will be used to develop a plan for renovating the Beecher Terrace public housing development and transforming the Russell neighborhood and is expected to lead to a Choice Neighborhoods Implementation Grant application during the Consolidated Plan period. The proposed Russell NRSA will not receive funds in Program Year 2015.

All HOPWA funding, with the exception of funds set aside for administration, is distributed to local subrecipients. Potential HOPWA subrecipients submit proposals directly to the Louisville Metro Department of Community Services, where the proposals are reviewed and recommended for funding. Eligible areas of service for HOPWA within the Louisville KY-IN Metropolitan Statistical Area (MSA) include Bullitt, Henry, Jefferson, Meade, Nelson, Oldham, Shelby, Spencer, and Trimble Counties in Kentucky and Clark, Floyd, Harrison, Scott, and Washington Counties in Indiana.

### Geographic Distribution

Target Area	Percentage of Funds
Metrowide	78%
Portland NRSA	5%
Shawnee NRSA	12%
Russell	5%

Table 3 - Geographic Distribution

### Rationale for the priorities for allocating investments geographically:

The majority of funds will be used to support programs metrowide for qualifying LMI census tracts and persons.

Louisville Metro typically allocates \$2 million in CDBG funding per NRSA. The Portland NRSA received its entire allocation in Program Year 2010, while the Shawnee NRSA has received its funding through partial allocations in Program Years 2012, 2013, 2014, and 2015. Louisville Metro intends to propose a Russell NRSA during the Consolidated Planning period, however no NRSA funds are designated for Russell in Program Year 2015. Funds included in the budget that will be dedicated to activities in Portland, Shawnee, and Russell include those dedicated to the Shawnee and Portland Homeownership Incentive

Program, public facilities improvements, agribusiness loans, and Choice Neighborhood Planning Grant match. It should be noted that funds identified as available on a metrowide basis are not excluded from use in the targeted areas and are in fact often utilized in these neighborhoods.

## AP-55 Affordable Housing

### Introduction

Expanding the supply of safe, decent, sanitary and affordable housing is a top goal of Louisville Metro Government, as identified in Louisville Metro's *2015-2019 Consolidated Plan*. Louisville Metro's departments undertake a number of activities aimed at increasing the number of affordable housing units as well as stabilizing the existing housing stock.

In 2012, Louisville Metro created a Six-Year Strategic Plan, highlighting affordable housing as one of its 21 goals as follows:

**Increase and Preserve Affordable Housing Choices throughout Metro Louisville:** Participate in the development and preservation of 5,000 new and/or rehabilitated quality and affordable housing units by FY18 and encourage public-private partnerships to dramatically increase the number of available quality and affordable housing units across the community.

The tables below list the number of households that will be provided with housing assistance in Program Year 2015.

One Year Goals for the Number of Households to be Supported	
Homeless	340
Non-Homeless	376
Special-Needs	284
Total	1,000

Table 4 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	288
The Production of New Units	110
Rehab of Existing Units	250
Acquisition of Existing Units	15
Total	663

Table 5 - One Year Goals for Affordable Housing by Support Type

## AP-60 Public Housing

### Introduction

Under Moving to Work, Louisville Metro Housing Authority prepares and submits an MTW Annual Plan, which outlines the Agency's mission and strategic goals that will guide LMHA's work. LMHA's plan during the next year to address the needs of public housing is to implement the Agency's MTW Annual Plan, including the activities described within the plan. The plan is for the period July 1, 2015 through June 30, 2016.

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

LMHA will continue with its commitment to provide affordable units throughout its public housing stock. Also, LMHA's Housing Choice Voucher program enables low-income families to choose a residence in the private market, further increasing housing opportunities for program participants by covering a portion of the monthly rental obligation through a Housing Assistance Payment (HAP) made directly to the landlord. In 2015, LMHA plans to serve almost 13,000 families through its MTW public housing and MTW HCV programs. This includes about 4,000 households through MTW Public Housing and over 8,400 MTW households through the MTW HCV program. In addition, LMHA serves families with non-MTW vouchers such as HUD-VASH for homeless veterans.

At the core of LMHA's mission lies its responsibility to maintain and manage its public housing developments. The day-to-day operation of the properties is among LMHA's highest priorities. The preservation and continued viability of its current rental housing inventory is central to LMHA's capital investment strategies. The Construction Administration Department continues to aggressively carry out the improvements outlined in the Agency's five-year capital plan, so that sites are in the best possible physical condition, despite their age.

LMHA's commitment to provide affordable housing units throughout its public housing stock during the next year is also demonstrated in a number of other ways. In 2015, LMHA will continue the following initiatives:

- **HUD Housing Choice Voucher Rent Reform Demonstration:** The US Department of Housing and Urban Development (HUD) is conducting a rent reform demonstration program, designed to test and evaluate an alternative rent policy, implemented by several Moving to Work (MTW) public housing agencies (PHAs). LMHA has agreed to participate in the study, and as such, will modify policies and rent calculations for a group of program participants (the Rent Reform Group), and will compare the results to a group of program participants who are assisted under the rent policies used for all other PHA assisted households (the Control Group).

The study will test an alternative rent policy that includes:

- A revised formula to calculate tenant share of rent and utilities – 28% of gross annual income

- A minimum rent payment from tenants to owners of \$50
  - A revised method of determining gross annual income
  - Elimination of deductions and allowances
  - Disregarding asset income of each asset valued below \$25,000
  - A triennial recertification procedure
  - A limited number of interim recertifications per household per year
  - A revised methodology for determining tenant rent to owner
  - A simplified utility allowance schedule
  - A hardship policy to protect tenants from excessive rent burden
- **Choice Neighborhoods Planning Grant for the Russell Neighborhood, including the Beecher Terrace public housing development:** Choice Neighborhoods is a HUD-funded grant program begun in 2010 which replaces the HOPE VI program. There are two types of Choice Neighborhoods grants: Planning and Implementation. LMHA has been awarded a \$425,000 planning grant. Louisville will have two years to complete a Transformation Plan for the Russell Neighborhood (including the Beecher Terrace public housing development which contains 768 apartments) and to submit the completed plan to HUD. The LMHA has hired EJP Consulting Group to serve as the Planning Coordinator for the process.

The goals of the Choice Neighborhood planning grant are to develop a Transformation Plan that will: transform Russell into a neighborhood of opportunity and choice; revitalize Beecher Terrace as part of an overall plan for improving the Russell neighborhood; and attract investments to the Russell neighborhood to improve quality of life for residents. Choice Neighborhood Planning Grant funds cannot be used for demolition, relocation, or replacement housing.

The Transformation Plan will examine options for redevelopment of the Beecher Terrace site. Any future redevelopment would require one-for-one replacement of any units that would be demolished. Displaced residents will be allowed to return either on-site or to off-site replacement housing if they were lease-compliant at the time of departure from the original site and have remained lease-compliant during the relocation period (no work/income requirements permitted). In addition, LMHA must offer wait list preference for returning residents for both on- and off-site replacement units.

- **Sheppard Square HOPE VI Revitalization:** LMHA submitted an application for a FY 2010 HOPE VI grant to revitalize the Sheppard Square public housing development. The development, which was built in 1942, suffered from inherent design deficiencies, as well as numerous operations failures. The application was submitted on November 17, 2010 and LMHA was selected from over 30 agencies as one of eight public housing authorities to receive a FY 2010 HOPE VI grant. LMHA was awarded \$22 million, the maximum HOPE VI grant award, for Sheppard Square. On-site, the new Sheppard Square will consist of public housing, low-income housing tax credit, and market rate units in a variety of housing types including single-family homes, semi-detached and row townhouses, and multi-family apartment buildings. Off-site, the

public housing replacement units will include service enriched units, as well as single-family homes and apartments in mixed-income communities. All new construction will meet Energy Star standards and the Enterprise Communities Green Community criteria. As with Liberty Green and all subsequent revitalization plans that require demolition of existing public housing units, LMHA has committed to one-for-one replacement of the 326 units at Sheppard Square.

LMHA has demolished all existing buildings on the site. In 2015, LMHA will rebuild a mixed-income community on the footprint. An RFP for on-site homeownership units will be issued later this year. In addition, bids for the historic Presbyterian Community Center have been received and redevelopment of the site will commence this year. Emphasis of the off-site acquisition strategy has shifted to purchasing replacement housing units, preferably located in areas of low poverty.

- **Clarksdale (Liberty Green) HOPE VI Revitalization:** In redeveloping the Clarksdale Public Housing Development, LMHA has to date received a total of \$40 million in Federal HUD HOPE VI Revitalization grant funds, obtained over \$200 million in physical development leverage, and partnered with several for-profit and non-profit developers to create more than 1,900 public housing, low-income tax credit, market rate rental, and homeownership units. To date, all of the rental units included in the original Revitalization Plan have been completed. Following the economic downturn, the site plan was revamped to respond to current market conditions, i.e., more market rate rental. A local developer is constructing 173 units in three buildings, with a portion of the units designated for students. One building has been completed and the other two are still in progress. Work will continue in 2015.
- **Redevelopment of the Friary:** LMHA expects to undertake redevelopment of the Friary, a building in east downtown that as configured contains 24 units. LMHA staff is currently negotiating the final details of the winning proposal, which intends to reconfigure the Friary with a total of 24 studio and one-bedroom units. LMHA will receive 6 of the units, under an extended use agreement, at the end of construction/rehab.

The LMHA strategy for improving the living environment of public housing families includes efforts to “be green” in regards to energy costs. Rising energy costs have made utility expenses a growing concern in overall housing affordability as well as a significant portion of LMHA’s operating budget. LMHA also incurs utility costs for units that are privately managed such as Park DuValle and Liberty Green and for those under lease in its Section 8 program. Beyond the budgetary impacts, there are environmental and health benefits to be reaped from our greening efforts, including cleaner air and water.

LMHA will continue to review ways to further enhance energy efficiency and site recycling initiatives. The recycling programs at Lourdes Hall and Avenue Plaza are fully operational; other sites are being considered. Also, Sheppard Square will have its own set of green initiatives, including mandatory recycling and composting (which have already started), rain water retention, bioswales and pervious pavers in the parking lots, photovoltaics, electric vehicle charging stations, a green roof, and four energy efficient/storm resistant houses. LMHA will pursue LEED Neighborhood certification for Sheppard

Square, funded in part by a US Green Building Council grant.

LMHA is addressing the needs of low-income families through its smoke-free initiative. While LMHA, the Louisville Metro Department of Health and Public Wellness, and partners officially closed out the Community Transformation Grant (CTG) in September 2014, LMHA will continue to work on its goal of making 16% of its housing stock smoke-free (approximately 550 units). To date, 106 completed or nearly completed units at Sheppard Square are smoke-free, the remaining 181 on-site Sheppard units will be smoke-free, and 27 units at other sites are smoke-free. LMHA has earmarked other sites to become smoke-free through attrition, including Will Seay Plaza, Lourdes Hall, St. Catherine Court, and St. Martins. Since September 2014, 102 residents at these sites and 256 residents at other sites have requested no-smoking unit designations. Over the course of the CTG grant period, LMHA also distributed grant funds to Section 8 landlords/management companies as financial incentives to create smoke-free units on the private market. LMHA has finalized another agreement with the health department that will provide up to \$10,000 in incentives to other property owners and managers who are interested in making their properties smoke-free. The health department is also making incentives available to LMHA residents who complete the Cooper Clayton smoking cessation classes.

A renewed commitment to safety and security is a fellow component of the strategy for addressing the needs of current LMHA residents and applicants. LMHA's Safety and Investigations Supervisor continues to evaluate security at the high-rises, with the intent to keep crime and incidents in those areas at a minimum. LMHA will continue to make enhancements and improvements based on these recommendations.

LMHA will continue to promote activities including the HCV Homeownership program, the Family Self-Sufficiency program, and MTW Special Referral Voucher programs, which tie supportive services to a housing voucher, to encourage resident self-sufficiency, education, and job training. LMHA will also continue to its MTW rent reform initiatives and work requirements, such as the work requirement at the Agency's HOPE VI Revitalization sites, to promote employment and community service among residents.

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

The Louisville Metro Housing Authority has formed Resident Councils at many of its housing developments to assist and serve as a resource for LMHA and the residents of the community. Resident Councils are charged with the responsibility of promoting programs and activities that improve the educational, recreational, cultural, and social opportunities for the residents of their respective community. The Resident Council Board members are also responsible for managing the affairs and conducting the business of the organization, as well as consulting with and keeping the residents informed.

Homeownership is an important housing option for many low-income families, and it is an affordable and secure way for qualified LMHA families to achieve self-sufficiency. LMHA has one of the strongest Housing Choice Voucher (HCV) Homeownership programs in the country and can boast that 219 families have purchased homes using the program (79 of which were in the Family Self-Sufficiency program).

LMHA had the first Section 8 closing in the nation in November of 1997 and has experienced exponential growth over the years. There has been one default and 31 homebuyers have left the program successfully. Participants challenge their over-representation in poverty statistics and under-representation in indicators of success.

The award winning program offers a comprehensive route to self-sufficiency for low-income families through mortgage assistance, counseling, and maintenance support. The HCV Homeownership option has helped LMHA families make the transition from renting to owning by allowing them to utilize the voucher to pay a portion of their mortgage for up to 15 years. From July 2013 through June 2014, eight clients purchased homes - seven homebuyers from the Section 8 program and one homebuyer who was a Public Housing (Sheppard Square) resident. Average income of these buyers at closing was \$20,771, which is below 50% of the area median family income. Average home sale price was just over \$109,165, with an average interest rate of 2.125%. Four of the eight buyers are elderly, disabled, or handicapped. One of the eight buyers utilized \$11,250 HOME down payment assistance through Louisville Metro Government. Participants continue to buy homes in nearly all areas of Louisville Metro.

In addition to financial assistance, the program provides intensive pre- and post-purchase counseling and requires homebuyer participation in Individual Development Accounts with a two to one match for repairs and maintenance to help families navigate the home-buying/home-owning process and increase their chances of success. LMHA will continue to recruit participants for this program.

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

This section is not applicable to LMHA.

## **AP-65 Homeless and Other Special Needs Activities**

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

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

Louisville has a homeless street outreach team funded by Continuum of Care (CoC) and Emergency Solutions Grant (ESG) and historically operated by Seven Counties Services, in addition to multiple privately-funded and volunteer outreach teams. The Seven Counties team engages homeless persons sleeping outdoors or in places not meant for human habitation. The engagement primarily involves attempting to collect personal information for HMIS, making health referrals to the healthcare clinic for homeless persons (Phoenix Health Center), and encouraging connection to the Common Assessment Team for coordinated assessment and potential housing program referral.

The Coalition for the Homeless began implementation of a single point of entry for homeless shelter in June of 2013, which removes the need for homeless people to wait in line in inclement weather, wait for a lottery to determine if they have a safe place to stay, or wander from place to place to find a bed for the night. Anyone can contact 637-BEDS to make a shelter reservation any day of the year. This process also ensures that shelter is reserved for those in greatest need, creates a way for institutions like hospitals and jails to prevent the release of homeless persons to the streets, and prevents people from becoming homeless in the first place by making referrals to homeless prevention services in the community. Because the system utilizes a scan card system, the length of time for check in has been greatly reduced at shelters and the data on homeless persons served is better than ever in the past.

Additionally, Louisville has a coordinated assessment and referral team called the Common Assessment Team, which assesses each homeless household in Louisville and then determines the most appropriate housing referral based on vulnerability. Since May 2014, the Common Assessment Team has assessed over 1,500 homeless families and individuals.

The Coalition for the Homeless identifies re-tooling crisis response to create collective impact as a goal in its 2016-2020 Blueprint to End Homelessness plan and intends to achieve this goal through short-term objectives such as continuing work with Neighborhood Place and Metro United Way's 2-1-1 social service line to refer individuals and families to homeless prevention services, maintain the Bed One-Stop centralized intake system, maintaining a strong and coordinated outreach team, and working with technical assistance providers to identify gaps and funding priorities in order to move persons more quickly and successfully through the system.

**Addressing the emergency shelter and transitional housing needs of homeless persons:**

The emergency and transitional housing needs homeless persons are assessed through the single point of entry and Coordinated Assessment Team systems described above.

Louisville's 2014 Point-In-Time Count indicates that there are more than 600 homeless persons in emergency shelter and approximately 400 in transitional housing on any given night. In recent years, several transitional housing projects have flipped to permanent supportive housing projects via the annual CoC NOFA process. While this has led to an increase in permanent supportive housing resources, transitional housing is still a practical option for young adults, those in recovery programs, and other subpopulations who agree up front to the additional requirements of transitional housing.

The Coalition for the Homeless identifies increasing access to stable and affordable housing as a goal in its 2016-2020 Blueprint to End Homelessness plan and intends to achieve this goal through short-term objectives such as creating 200 new permanent supportive housing units by 2020, supporting efforts by partners to acquire additional VASH vouchers for homeless veterans, and working with LMHA to create a "move-up" strategy to allow those stabilized in permanent supportive housing for over two years to move to Section 8, freeing up permanent supportive housing for those with the greatest need.

**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:**

Louisville's Common Assessment Team prioritizes all housing program referrals based on HUD's Notice CPD-14-012: "Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing and Recordkeeping Requirements for Documenting Chronic Homeless Status," which establishes an order of priority for permanent supportive housing beds to ensure that persons with the most severe service needs are given first priority, rather than utilizing a first-come-first-served approach. Prioritization also takes into account the local ending veteran homelessness initiative.

Louisville's Common Assessment Team intends to follow the goals laid out in the Federal Strategic Plan to Prevent and End Homelessness ("Opening Doors") to end homelessness for veterans, the chronically homeless, youth, and families in a staged process. The Louisville CoC is currently working to end veteran homelessness by the end of calendar year 2015 and will then shift efforts to focus on ending chronic homelessness.

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

Louisville Metro's Department of Community Services (LMCS) operates eight Neighborhood Place sites. Neighborhood Place serves as a community-based "one stop shop," providing access to LMCS homeless prevention programming such as short term rental assistance and eviction prevention services, as well as to other LMCS services and services from partner agencies such as the Kentucky Department for Community Based Services, Jefferson County Public Schools, and the local Community Mental Health Center. LMCS is currently working to identify potential locations for a new Neighborhood Place site in eastern Jefferson County in order to better serve newly-forming pockets of poverty in the area.

The Association of Community Ministries (ACM) also offers eviction prevention and homeless prevention services, including emergency rent and utility assistance, at 15 sites metrowide serving residents from every zip code. In the past, ACM has received funding for its emergency financial assistance programs through Metro's External Agency Fund (EAF), as well as other grants and private donations. EAF funding is awarded on an annual basis.

Volunteers of America – Kentucky offers an Eviction Prevention Program that stabilizes resident families and individuals living in Louisville Metro Housing Authority properties by preventing evictions through financial assistance, crisis intervention, mediation, and collaborations with other service providers. Recognizing the value of short-term assistance in preventing the long-term cycle of homelessness, the Eviction Prevention Program provides immediate financial assistance and crisis intervention.

Anyone facing potential eviction or homelessness in Louisville Metro can call Metro United Way's 2-1-1 social service line to be directed to appropriate homeless prevention resources, as well as to a variety of other social service resources. In addition to Jefferson County, the 2-1-1 line is available to eight additional Kentucky counties and three Indiana counties. In September 2014, Metro United Way expanded the service to include a mobile app, Kentuckiana 2-1-1, for both iPhone and Android devices.

## **Discussion**

Louisville Metro's Department of Community Services (LMCS) carries out its goals related to homelessness and non-homeless special needs through grants of CDBG, ESG, and HOPWA funds to subrecipients through a competitive annual process. LMCS has finalized its recommendations for Program Year 2015 subrecipients. A list of recommended subrecipients, projects, and funding amounts is included in Appendix A: Proposed 2015 Action Plan Budget and Subrecipients.

## AP-70 HOPWA Goals

<b>One year goals for the number of households to be provided housing through the use of HOPWA for:</b>	
Short-term rent, mortgage, and utility assistance payments	160
Tenant-based rental assistance	24
Units provided in permanent housing facilities developed, leased, or operated with HOPWA funds	0
Units provided in transitional short-term housing facilities developed, leased, or operated with HOPWA funds	0
Total	184

**Table 6 – HOPWA Goals**

## **AP-75 Barriers to Affordable Housing**

### **Introduction:**

Louisville Metro's Consolidated Plan outlines regulatory barriers to affordable housing, including the following:

- Louisville Metro's comprehensive plan, *Cornerstone 2020*, does not include an element that specifically addresses housing. While there are five goals (K1 through K5) related to housing in the Community Form element, with seven underlying objectives, the goals and objectives are broad in nature and do not provide detailed direction on how to modify to the existing policies and regulations that affect affordable housing. Further, the plan does not provide any estimates of current and anticipated affordable housing needs.
- Few incentives have been adopted into Louisville Metro's Land Development Code to address and encourage affordable housing. The most noteworthy existing incentive is the Alternative Development Incentives (ADI) program, which is voluntary and rarely used since its adoption in 2003. Another incentive is the Conservation Subdivision program, which encourages smaller single-family lots; however developers are not required to provide dedicated affordable housing as part of this program.
- A majority of the county is zoned residential and thus provides sufficient land zoned for housing by right, however most of that residential zoning is single-family residential. While single-family residential lots are sometimes developed with affordable housing, affordable housing is often associated with attached housing and multi-family residential housing.

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

Louisville Metro is in the process of carrying out several ad hoc amendments to the Land Development Code that would incentivize fair and affordable housing. In 2012 and 2013, a Louisville Metro Fair & Affordable Housing Sub-Committee met 18 times, resulting in several recommendations to a Land Development Code Main Committee and the Planning Commission. The Planning Commission voted unanimously to approve 11 of the recommendations to Metro Council. If adopted, these incentives will likely come into effect in late 2015.

Proposed amendments include the following:

- Alternative Development Incentives (ADI) – The existing regulations would remain optional; however they would be improved to encourage better utilization (i.e. removing site restrictions, simplifying the Diversity Housing Levels, etc.).

- Mixed Residential Development Incentive (MRDI) – A new optional incentive would be established, designed to encourage developments with a mixture of housing types, styles and pricing. This incentive would allow multi-family residential development to occur in certain single-family zoning districts without requiring a zoning change. A density bonus would also be offered in exchange for a commitment to provide multi-family units and affordable units.
- Affordable Housing Density Bonus (AHDB) – A new optional incentive would be established, in the form of a density bonus offered for commitment to provide affordable units within a development. This option could be applied to developments in zoning districts that allow residential development, single-family or multi-family, as a permitted use.
- Multi-family residential development to be allowed in the OR Office Residential District at a density of 12 units per acre.
- Attached housing to be allowed in the R-5A Multi-Family Residential District.

Additionally, Louisville Metro will initiate the process of creating a new comprehensive plan in 2015 that will replace *Cornerstone 2020* and have a new horizon of 2020 through 2040. It is anticipated that this new plan will be adopted some time in 2018. In the new plan, policies regarding housing will be strengthened. It is also possible that the new plan will include a new housing element, dedicated to providing specific and detailed goals and objectives related to housing, including those related to fair and affordable housing. As part of that process, Louisville Metro staff intends to reach out the public and educate them on the need for a comprehensive plan and its policies. This effort could improve public perception of fair and affordable housing. Following the adoption of the comprehensive plan, Land Development Code amendments will be carried out to further those new goals and objectives.

## **AP-85 Other Actions**

### **Actions planned to address obstacles to meeting underserved needs**

The biggest challenge to meeting the needs of underserved populations in Louisville Metro continues to be a lack of resources. Due to current economic conditions and with the majority of federal funding sources experiencing reductions in recent years, Louisville Metro has chosen to focus on activities that will address the basic tenets of the Consolidated Plan.

Activities such as Emergency Repair, Weatherization, Homeownership Counseling, Affordable Housing Development, and assistance to Community Housing Development Organizations (CHDOs) will assist low-income populations in securing safe, clean, and affordable housing.

The need for affordable housing in Louisville Metro is great. The 2008-2012 American Community Survey (ACS) shows that in Jefferson County 48.2% of all renters and 28.5% of homeowners are cost-burdened by spending more than 30% of their income on housing. Additionally, the National Low Income Housing Coalition's 2013 Report *Out of Reach* reported that 55% of Jefferson County renters - 59,100 people - are unable to afford a two-bedroom apartment at Fair Market rent. The community's great, unmet demand for permanently affordable housing is also seen in the Louisville Metro Housing Authority's wait lists of over 20,000 households. The lack of safe, clean, and affordable housing continues to impact families with children in Louisville. The Kentucky Department of Education reported that 8,318 Jefferson County students were homeless at some point during the 2013-2014 academic year using the definitions set forth in the McKinney-Vento Homeless Education Assistance Act.

Economic Development activities such as the micro-enterprise development and loan program will assist businesses seeking to expand, create jobs that will be available to low-income individuals, and provide assistance, training, and technical support to income-eligible individuals planning to start a business. Creating economic opportunities for low-income individuals and their families remains highly important. Funding for activities such as the Family Economic Success program will provide financial literacy and skills training to low-income individuals that will put them on the path to self-sufficiency.

Louisville Metro residents demonstrate a strong need for improved economic opportunity. The 2008-2012 ACS reports that 26.7% of Jefferson County households have incomes less than \$25,000 per year, well below the \$28,205 income needed to afford a two-bedroom apartment at HUD FY2014 Fair Market Rent (FMR) for Jefferson County, as determined by the Jefferson County housing affordability wage of \$13.56 per hour reported by the National Low Income Housing Coalition in its 2014 *Out of Reach* report. The need for better employment is heightened in some of our neighborhoods. According to the 2008-2012 ACS, 56.6% of households in the Louisville West Census County Division (CCD) earned less than \$25,000 per year, as did 56.1% of households in the Louisville Central CCD. The median household income is \$21,407 in the Louisville West CCD and \$20,777 in the Louisville Central CCD, both over \$25,000 less than Jefferson County's median income of \$46,710.

The demolition program will increase the safety and livability of the community, particularly in low-income areas. Vacant properties and structures pose a threat to neighborhood stability, homeowners'

equity, health, and public safety. The need to remediate the threat of vacant properties is strong. Many vacant structures and lots are concentrated in Louisville's West End neighborhoods.

Particularly vulnerable homeless and special needs populations will be assisted through programs within the department and through financial assistance to nonprofit subrecipients. Homeless individuals and families will be supported through CDBG and ESG funding distributed to nonprofit subrecipients. A ramp construction program will increase the mobility and self-sufficiency of individuals with physical disabilities. HOPWA funding will be distributed to subrecipients to provide supportive services, tenant-based rental assistance, and short-term rent, mortgage or utility assistance to individuals suffering from HIV/AIDS and their families. Direct support to homeless individuals and families in securing housing will be provided through a HOME funded tenant-based rental assistance (TBRA) program. Louisville's Common Assessment Team (funded through the Continuum of Care) will continue to perform coordinated assessments for all homeless persons and households in Louisville.

Louisville Metro is mindful that offering a choice of affordable housing and housing types in neighborhoods across the community is a key component of fair housing. The former LMCSR joined with the Human Relations Commission, Metropolitan Housing Coalition, and the University of Louisville Anne Braden Institute for Social Justice to develop *Making Louisville Home for Us All: A 20-year Action Plan to Further Fair Housing Choice*, released in February 2014. The plan examines the history of housing policies and practices in Louisville, analyzes the state of fair housing choice for protected classes, and identifies short-term (within 3 years), mid-term (4 to 7 years), and long-term (8 to 20 years) action steps for improving fair housing in Louisville Metro that build on those identified in the *2010 Analysis of Impediments to Fair Housing Choice in Louisville Metro, KY*. Louisville Metro will be responsible for instituting a number of initiatives under the plan that will improve fair housing opportunities.

### **Actions planned to foster and maintain affordable housing:**

#### **Affordable Housing Development Program**

The Affordable Housing Development Program provides the minimum financial assistance (gap financing) to a project from a qualified developer which results in owner-occupied or rental units affordable to households with incomes at or below 80% of AMI. Assistance may be provided for acquisition, new construction, substantial rehabilitation, or adaptive reuse. The Affordable Housing Development Program does not provide subsidies to refinance existing debt or inject funds into projects that are currently operating within an existing Period of Affordability. The purpose of the Affordable Housing Development Program is to offer housing choices to a range of homebuyers and renters, by creating "quality of place" neighborhoods, with a diverse blend of affordable housing types, supported by public facilities and other amenities.

The program goals are to offer housing choices to a range of homebuyers and renters by creating "quality of place" neighborhoods, with a diverse blend of affordable housing types, supported by public facilities and other amenities. Develop Louisville will prioritize projects that speak to Community Impact, e.g., projects that leverage existing neighborhood development activity in a way that provides for a visible impact. Develop Louisville is particularly interested in projects that will contribute to

permanent revitalization of an area, repurpose vacant and abandoned real estate and/or redevelop property currently owned by Louisville Metro Government, the Urban Renewal Commission, or the Landbank Authority. Developer capacity will be evaluated, with a review prioritized on past performance, particularly on projects successfully developed of a similar size and complexity. Project characteristics, market assessment, project financial structure, and readiness to proceed will also be evaluated in proposals reviews. Developers must be in good standing with the Secretary of State and Louisville Metro Government and must be registered, along with sub-contractors, with the federal System Award Management (“SAM”).

The former LMCSR Community Revitalization Division (now part of Develop Louisville’s Office of Housing and Community Development) created, in consultation with Capital Access, Inc., the “Affordable Housing Development Program & Application Guidelines” that were used in the 2013 NOFA and modified for the 2014 NOFA. This document serves to familiarize developer(s), Metro Council, and other internal and external stakeholders with Metro’s housing products and the application process. These guidelines provide underwriting guidance; introduces the rental, lease-purchase, and homeownership production opportunities; explains program funding rules and requirements; and provides specific instructions on how to apply for funding. Funding for the Affordable Housing Development Program in Program Year 2015 will be distributed via a competitive application process utilizing these guidelines as funding is available.

Affordable Housing Development Program Funding Priorities (not in rank order):

- Projects that rehabilitate existing structures, including historic structures.
- Projects that rehabilitate or redevelop vacant and/or abandoned property and/or property currently owned by Louisville Metro or Metro affiliated entities.
- Projects that build on existing and emerging neighborhood anchors (such as a school, church, full grocery store, hospital, park, or public transportation) route within .25 miles; other LMG-assisted efforts, such as a geographic focus on Priority Project Areas (PPA) as specified in the *RKG Vacant and Abandoned Property Neighborhood Revitalization Study*.
- Projects that increase affordable housing for low- and moderate-income households in census tracts that are not predominantly low-income, therefore promoting mixed-income neighborhoods.
- Projects that provide permanent housing for persons who are homeless, where the applicant has a formal relationship with a service provider that can and will provide supportive services.
- Projects that leverage private funding and qualify as HOME Match to count toward Metro HOME Match Requirements.
- Projects owned, developed and/or sponsored by a certified CHDO; and
- Projects that do not permanently displace existing residents.

### **Community Housing Development Corporation (CHDO) Program**

A Community Housing Development Organization (CHDO) is a private nonprofit, community-based service organization that has achieved a special designation as a developer of affordable housing.

Louisville Metro Government must reserve no less than 15 percent of HOME funds for investment in housing to be developed, sponsored, or owned by community housing development organizations. The CHDO must be the developer, owner, and/or sponsor of the HOME-assisted housing in order to access the CHDO set-aside. Develop Louisville will solicit CHDOs to submit projects as part of the HOME Affordable Housing Development Program, and through additional methods if necessary to meet the set-aside requirements.

Louisville Metro Government supports CHDOs by providing the following:

- Access to operating support
- Access to training and technical assistance in housing development and management
- Access to construction financing
- Access to gap financing
- The opportunity to earn reasonable developer fees
- Access to retention of CHDO proceeds

Louisville Metro currently provides support to two CHDOs, River City Housing, Inc. and REBOUND, Inc.

### **Emergency and Exterior Repair Program**

The Emergency and Exterior Repair program assists owner-occupants of single family homes to make emergency, health, and safety and code violations repairs to their home. The homeowner must be income eligible and have lived in the home for at least one year. Rental units are not eligible. The Emergency and Exterior Repair Program is available metrowide. Specific repairs are eligible for this program. They are:

- Electrical – Conversion of old fuse boxes to breaker systems; repair/replacement of electrical components considered hazardous by the Fire department or Metro Louisville Electrical Inspectors.
- Heating Systems and Air Conditioning – Replace or repair non-functioning heating systems or duct work if necessary. Install or replace air conditioning systems upon written documentation from a physician confirming a medical necessity.
- Plumbing – Replacement of nonfunctioning hot water heaters, repair/replacement of gas or water supply lines from utility connection to the house; and sewer lines from MSD connection from the street to the house.
- Exterior repairs – Windows, doors, steps/railings, painting/siding, roofing, gutters, spouts, etc.

### **Metrowide Weatherization Supplement**

This program, utilized to supplement funds provided by the U.S. Department of Energy through Community Action Kentucky, is designed to provide assistance to homeowners needing insulation, weather-stripping and repair and/or replacement of energy systems in the form of a grant. These repairs/replacements include, but are not limited to: furnaces, water heater, duct work, and carbon dioxide and smoke detectors.

## **NRSA Homeowner Rehabilitation Activities**

Develop Louisville plans to accomplish Shawnee neighborhood improvement through homeowner rehabilitation that will improve the livability and quality of homes through various CDBG-eligible home repairs. An average of \$15,000 will be available per qualified household with a maximum of \$24,999 per household. Improvements may include repair or replacement of windows, front and back entry doors, concrete, roofs, paint, vinyl siding, stairs, shutters, security windows and doors, and gutters. Where needed, lead safe work will be done and code violations will be addressed. Metro will take a targeted approach to the NRSA homeowner rehabilitation program by prioritizing major street corridors as investment areas.

### **Actions planned to reduce lead-based paint hazards**

The Lead Safe Louisville program is currently operating under a \$2.4 million Lead-Based Paint Hazard Control Program grant, effective July 1, 2013 and expiring June 30, 2016. Lead Safe Louisville intends to reach the following goals by June 2016:

- 140 units inspected
- 130 units completed
- 30 outreach events/activities (2,500 people reached)
- 90 workers trained

As of February 2015, the Lead Safe Louisville program had made substantial progress toward the grant goals, with 83 units inspected, 20 units completed, and 86 people trained, and had surpassed its outreach goals with 36 outreach events completed and over 5,000 people reached.

### **Actions planned to reduce the number of poverty-level families**

Louisville Metro Department of Community Services (LMCS) maintains a comprehensive slate of anti-poverty programs meant to address a continuum of needs from crisis to self-sufficiency. LMCS will continue to operate the following in Program Year 2015:

- **College Scholarship** — provides scholarships to low-income college students to remove educational barriers to self-sufficiency.
- **Financial Empowerment Services** — provides financial education classes, trains frontline staff, and coordinates financial empowerment initiatives and events for Louisville Metro.
- **Financial Assistance** — provides financial assistance for housing and utility payments coupled with case management services to households with an employment history.
- **Foster Grandparent Program** — offers seniors with limited income the opportunity to serve as mentors to children with “exceptional or special needs.” Foster Grandparents lend their time, skill, and life experiences to assist children in reaching their potential academically, behaviorally, and developmentally. In return for volunteering, Foster Grandparents receive a small tax-free stipend.

- **Homelessness and Housing Services** — using multiple federal HUD grants, provides the homeless and disabled with on-going Permanent Supportive Housing. Program participants receive on-going supportive service assistance as a stipulation of LMCS’s continued rental assistance provision. Case managers work with participants to set annual service and financial goals, which can lead to self-sufficiency.
- **Job Development and Workforce Training** — provides scholarships to low-income job seekers to obtain specialized skills (such as CDL, welding, barbering, etc.) needed for living-wage employment.
- **Low Income Home Energy Assistance Program (LIHEAP)** — provides financial assistance to prevent utility disconnection during winter months for low-income residents.
- **Microbusiness Program** — provides low and moderate income business owners supports with starting and growing a small business, including training, technical assistance, and low-interest loans.
- **Preschool Scholarship** — provides low-income families scholarships to send preschool-aged children to an accredited preschool to increase kindergarten readiness.
- **Senior Nutrition** — Operates congregate meal sites providing lunch, educational, and recreational activities throughout the city. Senior Nutrition also administers the Meals on Wheels program, providing nutritious meals to home-bound seniors throughout the city.
- **Supportive Services** — provides clients enrolled in all case-managed department programs assistance with removing common barriers to self-sufficiency goals, including childcare, transportation, housing, and expungement financial assistance.

LMCS also operates eight Neighborhood Place sites. Neighborhood Place serves as a community-based “one stop shop,” providing access to LMCS programming as well as to services from partner agencies such as the Kentucky Department for Community Based Services, Jefferson County Public Schools, and the local Community Mental Health Center under one roof for citizens. LMCS is identifying potential locations for a new Neighborhood Place site in eastern Jefferson County to better serve newly-forming pockets of poverty in the area. Additionally, LMCS maintains partnerships with a large number of nonprofit service providers in the areas of employment; education; financial literacy, advocacy, and empowerment; housing and homelessness prevention; emergency services; nutrition; community and civic participation; long-term self-sufficiency programs; and emergency health services. These partnerships make it possible to provide the best service possible for low-income individuals seeking assistance.

**Actions planned to develop institutional structure:**

Louisville Metro will continue to work with nonprofit partners in implementing the goals of its Consolidated Plan and annual Action Plans.

Louisville Metro will continue to collaborate with Louisville Metro Housing Authority in targeted redevelopment areas. Metro has supported LMHA’s HOPE VI redevelopment efforts and will continue to support LMHA’s work in the Russell neighborhood through the Choice Neighborhoods Planning Grant process. Develop Louisville staff is involved on the coordinating committee for the Choice

Neighborhoods project and a staff member from the Office of Housing and Community Development serves as co-lead for the Housing Task Force. The Choice project will result in a Transformation Plan for the Russell neighborhood, including the Beecher Terrace public housing development, and is expected to lead to an application for a Choice Neighborhoods Implementation grant during Program Year 2016.

Develop Louisville and Department of Community Services staff will attend professional development events and complete trainings as available to ensure continued compliance with federal regulations and knowledge of innovative housing, community development, homelessness, and anti-poverty programs.

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

Many of Louisville's service agencies work collaboratively to address core issues surrounding poverty including financial security, education, job training, employment opportunities, safe and affordable housing, and access to medical and mental health services. As many service providers are struggling with dwindling funding, collaboration and collective impact models have and will likely continue to become increasingly important to meeting the needs of Louisville's low to moderate income residents. Louisville Metro's Department of Community Services (LMCS) serves as the lead coordination agency for non-profit organization collaboration as it relates to local funding resources for homeless prevention, poverty reduction, and related services.

LMCS' extensive coordination and linkages with government and other social programs ensure the effective delivery and reduced risk of duplication of services. LMCS collaborates with more than 100 agencies and/or forums, including Metro departments, state agencies, service providers, faith-based organizations, and others. Going forward, LMCS plans to evaluate its linkages, focusing on creating quality, engaged relationships and identifying and eliminating gaps in order to better serve the low-income community.

LMCS provides nearly \$3 million annually to local non-profits for homeless prevention, emergency shelter, street outreach, and case management services through ESG, HOPWA, CDBG, and CoC funds. LMCS awards additional non-federal funds to nonprofit social service providers through Metro's External Agency Fund.

LMCS will continue to be heavily involved in the Louisville Continuum of Care, which is coordinated through the Coalition for the Homeless. LMCS is represented on the CoC advisory board, at monthly CoC meetings, and holds monthly coordination meetings with the Coalition.

LMCS also houses the Louisville Metro Community Action Partnership (LMCAP). The Executive Director of Louisville Metro Housing Authority serves on the LMCAP board of directors as a permanent member due to the significant role LMHA plays in the lives of many LMCAP clients, which allows better coordination of efforts between LMCAP and LMHA.

LMHA's position on the LMCAP board of directors also proves beneficial in relation to self-sufficiency programs. LMCS' goal is to be a "one-stop shop" for addressing multiple barriers to self-sufficiency by

assessing a family or individual's situation as a whole and linking them to departmental and community services and resources. LMHA has a self-sufficiency program which provides intensive case management services to residents living in public or subsidized housing to help them accomplish long-term goals and develop job skills, parenting skills, and knowledge about income management and homeownership. LMCS leverages LMHA's position on the LMCAP board of directors as a resource for knowledge, experience, and best practices for self-sufficiency services. LMCS provides housing supports to agency clients engaged in case-managed programs as necessary to minimize this burden on households working towards self-sufficiency.

## AP-90 Program Specific Requirements

Louisville Metro has prepared program specific requirements for the use of CDBG program income, HOME resale and recapture, and ESG performance standards.

### Community Development Block Grant Program (CDBG)

Projects planned with all CDBG funds expected to be available during the year are identified in section AP-35. The following identifies program income that is available for use that is included in projects to be carried out.

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

Louisville Metro policy is to use all program income without any carryforward. If the amount of program income received in the last month of the program year exceeds the entitlement expenditures for that month, then funds will carry forward, however there is a limited possibility of this happening.

<b>Other CDBG Requirements</b>	
The amount of urgent need activities	0
The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income	76%

**HOME Investment Partnership Program (HOME)**

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

Louisville Metro uses no other forms of investment beyond those identified in Section 92.205. Under 92.205, a participating jurisdiction may invest HOME funds as equity investments, interest-bearing loans or advances, non-interest-bearing loans or advances, interest subsidies consistent with the purposes of the HOME program, deferred payment loans, grants, or other forms of assistance that HUD determines to be consistent with the purposes of the program. Each participating jurisdiction has the right to establish the terms of assistance, subject to the requirements of this part.

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

**Guideline for Resale or Recapture**

**Period of Affordability**

For homebuyers and rental projects assisted with HOME funds the length of the affordability period depends on the amount of the HOME investment in the property and the nature of the activity funded. The table below provides the affordability periods:

<b>HOME Investment per Unit</b>	<b>Length of the Affordability Period</b>
Less than \$15,000	5 years
\$15,001 - \$40,000	10 years
More than \$40,000	15 years
New Construction of Rental Projects	20 years

The Final Rule (September 1996) eliminated the requirement that when HOME funds are used in conjunction with Federal Housing Administration (FHA) insurance, the affordability period is the term of the FHA-insured mortgage.

**Sale Prior to Completion of the Period of Affordability**

If the homeowner chooses to sell their property during the Period of Affordability, the property is subject to recapture provisions (as described in the following section) in compliance with HOME Regulations at 92.254

**Resale/Recapture Provisions 92.254 (a)(5)**

***Definitions***

Resale: Under the resale provision, the period of affordability is based on the total HOME subsidy in the project. Under this provision, an assisted homebuyer is obligated to sell his/her property only to another HOME eligible buyer at a price that is deemed by the by Louisville Metro Government to be fair to both parties.

Recapture: Under the recapture provision, the period of affordability is based on the direct HOME subsidy to the homebuyer only. Under this provision, the homeowner repays all or some of the HOME subsidy and is able to sell his/her home to any buyer at any price.

**Louisville Metro Government does not use the resale provision for any HOME-assisted properties.** Louisville Metro Government places restrictions on all HOME-assisted homebuyer properties by electing to use the recapture provision for all of its Homebuyer Assistance Programs in an effort to help preserve affordable housing.

The recapture provision used by Louisville Metro Government is *Reduction During Affordability Period*. Louisville Metro Government will require the direct HOME subsidy to be repaid if the client sells the home, voluntarily or involuntarily, before the period of affordability expires. This recapture provision will include a ten percent forgiveness clause for each year the homebuyer lives in the home, with a ten-year period of affordability if the direct HOME assistance does not exceed \$40,000 per unit. If the direct HOME assistance exceeds \$40,000 per unit, the period of affordability is 15 years.

Example: Mr. John Doe purchases a home for \$100,000 and receives \$8,000 in HOME funded homebuyer assistance funds from Louisville Metro in January 2012. This \$8,000 loan is subject to recapture should Mr. Doe sell the property during the five year period of affordability. At the end of year three, December 2013, Mr. Doe sells the property. As a result, thirty percent, \$2,400 is forgiven resulting in a loan balance of \$5,600 to be repaid from the net proceeds of the sale.

$$\frac{\text{Number of years homebuyer occupied the home}}{\text{Period of affordability}} \times \text{Total direct HOME subsidy} = \text{Recapture Amount}$$

If the net proceeds of the sale are not enough to repay the direct HOME subsidy, the amount recaptured will be equal to the net proceeds available.

“Net Proceeds” are defined as the sale price (whether from a voluntary or involuntary sale) minus the repayment of any superior loans (other than HOME Funds) and any closing costs.

Net proceeds calculation example in year five of period of affordability with 10% annual forgiveness:

Direct HOME subsidy	\$30,000
Five year pro rata reduction	<u>-\$15,000 (\$30,000 X .10 X five years)</u>
	\$15,000
<u>Net Proceeds</u>	
Sales proceeds	\$150,000
Superior non-HOME debt	-\$130,000
Closing costs	<u>-\$5,000</u>
	<b>\$15,000</b>

Homebuyer investment outside of closing costs shall not be subtracted from net proceeds.

Louisville Metro Government shall impose recapture provisions through a HOME written agreement, as a separate legal document from any loan instrument. The HOME written agreement with the homebuyer shall make the period of affordability, principal residency requirements, and terms and conditions of the recapture requirements clear and detailed. The HOME note will also be used to impose the recapture requirements.

Louisville Metro Government shall perform ongoing monitoring of the principal residency requirement during the period of affordability.

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

See above.

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

Home funds will not be used to refinance existing debt secured by multifamily housing that is being rehabilitated with HOME funds.

### **Emergency Solutions Grant (ESG)**

**Include written standards for providing ESG assistance.**

#### *Standard Policies and Procedures for HMIS participation*

The Coalition for the Homeless is Louisville Metro's HMIS lead and is therefore responsible for reviewing, revising and approving all policies and plans for HMIS. All ESG subrecipients are required to participate in HMIS and adhere to the policies and procedures established by the HMIS lead. Legal Services and programs for victims of domestic violence are exempted from HMIS participation, but must be able to submit comparable reports.

HMIS is the primary reporting mechanism for ESG and reports will be submitted to metrocompliance@louisvilleky.gov on a regular basis, as required by the ESG program manager, to ensure data quality.

When implementing HMIS procedures, ESG subrecipients must not violate the Health Insurance Portability and Accountability Act (HIPAA). Victim service providers and those providing legal services are exempted from HMIS if they are legally prohibited from participating in the system, but they must use a comparable database and provide reports/data as requested by Louisville Metro Government or the Coalition for the Homeless.

### *Standard Policies and Procedures for evaluating persons or families eligible for assistance*

In conjunction with Emergency Solutions Grant regulations at 24 CFR 576.400(d) homeless individuals and families must enter the homeless service provider system through the Single Point of Entry (SPE) established by the Coalition for the Homeless. The SPE is called the “Bed One-Stop.” Individuals and families who are not homeless but are seeking assistance are diverted to more appropriate community resources, such as Neighborhood Place and Metro United Way.

All persons seeking homeless shelter services should contact the Bed One-Stop at the Coalition for the Homeless for assessment and referral. This assessment begins with intake by phone or at the Coalition Bed One-Stop office. Intake staff will collect the HMIS universal data elements necessary to enter the client into the HMIS system and to make a referral to emergency shelter. Once in shelter, each person will be assessed by the Common Assessment Team staffed by Family Health Centers to help make appropriate referrals to the best options including permanent housing, transitional housing, and rapid re-housing

The types of ESG assistance available will fall into 4 categories: prevention, rapid re-housing, emergency shelter and homeless services. The intake staff will also evaluate ESG eligibility and a participant’s eligibility will be confirmed during the common assessment. The common assessment is an in-depth assessment of the client’s needs. An individual plan for that client will then be developed that includes a housing goal and an income goal. The plan will also include referrals to mainstream resources, such as Social Security Disability, food stamps, Section 8, or services for veterans. Program participants will then be referred to the most appropriate available program. Their individual plan will go with them. At the end of each common assessment, a checklist will be completed that will determine which programs may be appropriate for that participant. The agency staff will then go over the program options with the client to address questions, concerns and preferences. The staff will check the capacity of the best program for that client. If the first program choice is full and will be at capacity for more than 30 days, the agency staff will direct the client to the next best program.

The new Louisville Common Assessment Team (funded through the Louisville Continuum of Care) began performing coordinated assessments for all homeless persons and households in Louisville, KY in the spring of 2014. The actual Common Assessment survey tool is incorporated from the national 100,000 Homes survey tool [the Vulnerability Index/Service Prioritization Decision Assistance Tool (VI-SPDAT)]and will be used to prioritize those using Louisville’s homeless system by various vulnerabilities. The Common Assessment Team also maintains and refers from one community referral list for all HUD COC funded transitional and permanent supportive housing options in Louisville, KY. ESG program referrals have also been coordinated through the Common Assessment Team since May 2014. All referrals are made based on vulnerability ranking as determined by the VI-SPDAT.

### *Policies and procedures for coordination among providers*

Coordination among providers will be attained through the Continuum of Care, the common assessment process, and our community’s White Flag program. The common assessment process allows providers to refer clients to other providers as appropriate. All ESG providers are required to be active

participants in our community's Continuum of Care, which will serve as a vehicle to discuss system-wide issues and concerns. Our community's White Flag program is the-coordinated response to inclement weather that makes it unsafe for people to be on the streets. ESG subrecipients are also able to participate in the ESG Interagency meetings which will be held as needed.

*Policies and procedures for determining and prioritizing who will receive homeless prevention or rapid re-housing*

Program placement will be based on need, eligibility, capacity of the programs, and the appropriateness of programs for participants. Program participants who are eligible for Shelter Plus Care or other subsidized permanent housing programs will be referred to those programs first. Program participants who are at-risk of homelessness but who will lose their housing before a prevention program can be of assistance will typically be referred to a rapid re-housing program. The placement of other participants in a rapid re-housing or prevention program will be determined during the in-depth assessment process and the development of an individualized plan. Participants who seem to be able to achieve housing stability with a short period of assistance will be prioritized for rapid re-housing programs.

ESG prevention assistance is currently limited to one program: Legal Aid Society's eviction prevention program. The Legal Aid Eviction Prevention program provides legal counseling to help participants avoid eviction. Any individual or family who is eligible for prevention assistance and facing eviction can receive legal counseling through this program. The amount and type of services received is determined on a case-by-case basis.

Louisville's Common Assessment Team (funded through the Louisville Continuum of Care) began performing coordinated assessments for all homeless persons and households in the jurisdiction in May 2014. The Common Assessment Team will also maintain and refer from one community referral list for all permanent supportive housing options in Louisville, KY. The Common Assessment Team makes all referrals to the ESG Rapid Re-Housing Program. All emergency shelter referrals are made by Bed One-Stop.

*Standards for determining the participant share of rent and utilities*

The participant share of rent and utilities can be determined in one of two ways, either through a "shallow subsidy" model or a "lump sum" model. Louisville Metro's Community Services and Revitalization department intends to do a "lump sum" payment standard for ESG direct client assistance. The payment standard will be based on household size (i.e. single-person household will receive up to \$500 in monthly ESG assistance, two-person household will receive up to \$550, etc.). Louisville HPRP had considerable success administering a lump sum payment standard for HPRP. The monthly payment will be for rent, but utility payments could be made on a case-by-case basis (provided that the lump sum assistance amount is not exceeded for the household size).

*Standards for determining the length and level of assistance*

Prevention assistance will be provided to eligible program participants in the amount necessary to stabilize their housing, as determined by the assessment process. The standards used to determine the amount to be provided will include: the level of available social supports (i.e. whether or not the person being assessed has exhausted supports from family, friends, churches or other potential supports) and the documentation of eligibility and need (i.e. the documentation of income and the threat to housing stability.)

Emergency Shelter will be provided to program participants who are homeless, as defined by HUD in 24 CFR 576.2.1. Emergency Shelter will be provided for no more than 180 days, with the expectation that program participants will have moved on to a housing solution. The exception to the 180 day length of stay will be made for those program participants who refuse other services in writing before they exceed 180 days in an emergency shelter in a program year. An exception can also be made if an individual plan calls for permanent housing or transitional housing, and those programs are at capacity and unable to be utilized for immediate housing placement. Essential Services will be available to any program participant utilizing Emergency Shelter. A case manager will provide an in-depth assessment and individualized plan for all program participants within the first 14 days of a participant's stay in the shelter. Additional case management will be provided on an as needed basis and no-less than monthly for program participants in emergency shelter until they are moved to a program providing them a housing solution.

Rapid re-housing rental assistance will be provided to program participants who are prioritized through Louisville's coordinated assessment team ("Common Assessment Team"). Based on current national perspective, rapid re-housing seems to work best for homeless families and others who need shorter-term interventions. The goal is for rapid re-housing program participants to achieve housing stability in a relatively short amount of time. The current ESG rapid re-housing program is set-up as a flat 12 months of assistance, with the payment standard being the size of the program participants' household. There is a declining payment standard starting with the tenth month of assistance. The ESG rental assistance drops \$50 in the tenth month, another \$50 in the eleventh month, and then another \$50 in the twelfth month of assistance. Twelve months has been set for the program due to local landlord preferences. Many local landlords are hesitant to agree to program requirements if less than a standard 12-month lease is provided. Case management services are provided at least monthly for all ESG and CoC rapid re-housing program participants. In addition, housing placement services are provided on the front end of the program to ensure that qualifying program participants secure housing as soon as possible.

All ESG subrecipients will have a written termination procedure with the following minimum standards: written notice to the program participant containing a clear statement of the reasons for termination; a review of the decision, in which the program participant is given the opportunity to present written or oral objections to a person who is not the person who initiated the termination or a subordinate of that person; and prompt written notice of the final decision to the program participant. The termination of a client will not bar the program participant from receiving further assistance at a later date.

*Standards for determining the type, amount and duration of housing stabilization services, including limits.*

Housing stabilization services will be provided as needed to program participants receiving prevention and rapid re-housing assistance. Each ESG participant receiving housing stabilization services will have a unique and individualized case plan. Housing stability case management will be provided once a month to program participants. Except for housing case management, no participant may receive more than 24 months of assistance over 3 years.

#### *Standards for Street Outreach*

ESG subrecipients providing street outreach will work with service providers and other community networks to identify, support, and stabilize the unique needs of those who are living on the street. Street Outreach Teams will collect basic information in the attempt to add information into HMIS. Those who want to engage further will be screened through the coordinated assessment process. Appropriate referrals and resources will be identified based on this assessment.

Those living on the streets may be served by one of several street outreach teams currently active within the Louisville Continuum of Care (CoC). The Seven Counties Mental Health Outreach team is funded through the Louisville CoC and is the primary street outreach team for homeless adults with mental health concerns in Louisville. YMCA Safe Place Services is funded partially with Street Outreach Runaway and Homeless Youth funding through the Department of Health and Human Services (DHHS) and focuses on at-risk populations of 12 to 22 year olds, with primary education efforts to 12 to 17 year olds and street outreach and case management services to 18 to 22 year olds. They perform street outreach 5 days/nights a week in areas around Louisville, KY.

Seven Counties Mental Health Outreach leads the annual homeless Street Count each January and has also been instrumental with the Rx: Housing initiative (100,000 Homes campaign). Homeless street outreach is also performed in Louisville by the Wayside Christian Mission Samaritan Patrol, the River City Love Squad, and the Healing Place CAP Van outreach effort. These additional outreach teams do not receive Continuum of Care funding and operate on a more limited basis, but do perform consistent homeless street outreach efforts throughout the year.

#### *Standards for Emergency Shelters*

ESG Program Participants will be admitted to the shelter system through Bed One-Stop (Louisville's Single-Point of Entry team maintained by the Coalition for the Homeless), where the capacity of each shelter, client preference and client eligibility will be assessed on a limited basis prior to shelter bed referral. Bed One-Stop will refer clients to a shelter with available beds and divert persons who are not eligible. If all participating shelters are at capacity the SPE will work with eligible participants to access alternate resources until they can access a bed.

ESG regulations at 24 CFR 576.102(b) prohibits involuntary family separation. As such the age, of a child under age 18, must not be used as a basis for denying any families' admission to a shelter that serves

families with children under 18. For example, a shelter that serves families may not deny services to a family due to the presence of a teenage child of either gender.

Emergency shelters will discharge participants once participants have been referred and accepted into another program or have accessed permanent housing. Emergency shelters will follow the same termination policy outlined in the Standards for Determining the Length and Level of Assistance, if warranted.

All emergency shelters in Louisville are licensed through Louisville Metro Government's Land Development Code. Each shelter is subject to annual inspections for health and safety. Emergency Day Shelters are not subject to the licensing requirement and will be subject to an annual habitability inspection as part of their monitoring by Louisville Metro Government. In addition, all of Louisville's emergency shelters undergo the Quality Assurance Standard (QAS) process administered by the Coalition for the Homeless. The QAS process reviews programmatic, policy and professional standards. Failure to comply with the QAS process and standards is reported by the Coalition for the Homeless to Louisville Metro Government. A lack of compliance will elevate a subrecipient's risk assessment status (for program monitoring) and is a factor in future ESG funding decisions.

The needs of special populations will be addressed by identifying program participants (through the new common assessment process) who are affected by HIV/AIDS, mental health issues, domestic violence, sexual assault or other issues that require additional services besides those offered to the general population and referring those participants to appropriate services. The new VI-SPDAT coordinated assessment tool identifies participants with special needs during the assessment process. The new CAT will be trained on proper referral for those that identify with special needs. Additional HUD housing program options (i.e. non-CoC funded housing) are included as housing referral options for the new coordinated assessment system in Louisville (i.e. HOPWA, HOME TBRA, etc.). Emergency shelter staff will assist the Common Assessment Team in conducting VI-SPDATs over the course of the program year.

In addition to the tools provided through the common assessment and referral process, training will be provided to help deal with the sensitive issues of these vulnerable populations. The Center for Women and Families, House of Ruth, Wellspring, etc. may be involved in annual training efforts with Louisville's Continuum of Care. The ESG program manager will work to coordinate other trainings related to serving vulnerable populations.

#### *Homeless Participation Policy*

The Homeless Consumer Participation Task Force formed in June 2012 to address and encourage the participation of homeless and formerly homeless persons in the homeless services system. The Task Force was guided by the ESG written standards submitted as part of the second amendment to the 2011 Action Plan. This group organizes Consumer Participation research activities that serve to engage those who are homeless or who are formerly homeless. The Task Force is made up of mostly emergency shelter staff members who do outreach to potential group members and run the meetings. Formerly homeless individuals participate in the Task Force as well. The purpose of the Client Participation group is to engage those served by the homeless system, inform them of policy issues, and seek their input on

these issues. A primary activity of the Task Force is engaging consumers through the annual Project Stand Down/Homeless Connect event to get feedback on needs, concerns, and experiences with homeless services in Louisville. At the 2014 Stand Down University of Louisville social work students interviewed over 74 consumers on behalf of the Task Force. The Task Force also engages in research and outreach to targeted subpopulations. For example, the winter and spring 2015 project was to conduct interviews with transgender persons who are, or have, used the homeless services system. The goal was to learn about consumer experiences and to gauge both consumers' and shelter staffs' knowledge of the rights and responsibilities under the Equal Access to Housing final rule and HUD Notice 15-02, Appropriate Placement for Transgender Persons in Single-Sex Emergency Shelters and Other Facilities.

Insight and information gained from Task Force activities are sent to each participating agency's board and to the board of the Coalition for the Homeless, and shared with the Continuum of Care. When appropriate, the Coalition for the Homeless and Louisville Metro will engage agencies in a wider conversation about how to address information that arises from the client participation group, including whether or not to change policies and procedures that all participating agencies are held to. ESG agencies who are actively engaged in this group will be able to meet the ESG rules and regulations requirement for participation from the homeless and/or formerly homeless persons. Agencies who don't participate in this are expected to have a homeless or formerly homeless person on their respective board of directors, to perform regular client surveys that affect policies and procedures, to hold regular client participation meetings, or some combination of these activities. All ESG agencies should have a written Homeless Participation Policy and Louisville Metro monitors for this.

#### *Participation in HMIS and Performance Standards to Evaluate ESG activities*

In FY13, a common set of outcomes for ESG were developed in collaboration with the HMIS lead agency and CoC coordinator that will be measured through HMIS:

<b>ESG Program Year 2015 Outcomes and Benchmarks</b>	
1.	25% of those leaving emergency shelter will move into permanent housing.
2.	The average length of stay in emergency shelter will be 30 days or less.
3.	25% of those leaving emergency shelter will leave with cash income.
4.	10% of those leaving emergency shelter will have employment.
5.	50% of those leaving emergency shelter will leave with non-cash benefits.
6.	85% of those leaving emergency shelter will have a known destination in HMIS.
7.	75% of those who receive prevention assistance will remain housed after 6 months.
8.	75% of those who receive street outreach assistance will move into shelter of some kind (emergency or permanent.)

Louisville Metro Government requires that all ESG subrecipients participate in HMIS (except for those providing legal services, services to the victims of domestic violence or sexual assault and those serving HIV/AIDS affected participants); as applicable under ESG rules and regulations. Subrecipients serving these populations are required to use an equivocal system to provide the necessary summary reports to Louisville Metro Government. This requirement will be included in each subrecipient’s grant agreement and will be enforced through program monitoring.

Also, ESG Performance standards will be measured through HMIS. The standards that will be measured to evaluate ESG activities include: service provider’s ability to move persons from emergency/transitional/unstable housing to permanent housing; service provider’s ability to assist clients in increasing income from entry into the homeless provider system to exit; service provider’s ability to reduce the recidivism rate within the homeless provider system; and a service provider’s ability to reduce the length of people’s stay within the homeless provider system; as well as occupancy rates (average of four Point In Time counts) for overnight shelters and service delivery rates (how often/how much case management is being provided) for service providers.

*Process for Making Subawards*

Louisville Metro Government’s process for making subawards is a competitive application process. Each year, Louisville Metro Government announces to past ESG subrecipients and the larger CoC body that applications are being accepted. A panel scores and ranks applications in order to make a funding recommendation to the Mayor. The panel’s recommendation goes to Louisville Metro Council for review and approval, as part of the city’s larger budget process. Once the budget is passed in full, ESG subawards are made.

*Consultation with Continuum of Care*

The policies described above were developed in conjunction with the CoC in 2012 in response to HEARTH Act changes to CoC activities and governance. The Louisville Metro Government ESG program manager consults and collaborates with the CoC through meetings, presentations and conversations as needed. The Louisville Metro Government ESG program manager is a CoC representative and also serves on the CoC advisory board. Through these roles, the ESG program manager is able to consult

with the CoC about program goals, operations, and standards. ESG changes, updates and issues are regularly discussed at CoC meetings. All ESG subrecipients are members of the CoC.

Additionally, in March 2014, the CoC appointed a Board of Directors. Louisville Metro Department of Community Services is represented on the CoC Board of Directors by Joseph Hamilton, Jr. Social Service Program Supervisor II.

<b>Louisville Continuum of Care Board of Directors</b>	
<b>Name</b>	<b>Organization or Affiliation</b>
Kathy Beach	Main Source Bank
Mark Bolton	Louisville Metro Department of Corrections
Giselle Danger-Mercaderes	Jefferson County Public Schools
Kim Frierson	YMCA Safe Place
Joseph Hamilton, Jr.	Louisville Metro Department of Community Services
Ramona Johnson	Bridgehaven
Wade Jordahl	Humana
Dan Lane	St. Matthews Area Ministries
Kenny Lanham	Lanham Associates
Rosemary Luckett	Kentucky Housing Corporation
Michelle Neuhauser	Wellspring
Lisa Osanka	Louisville Metro Housing Authority
Stewart Pope	Legal Aid Society
Maria Price	St. John Center for Homeless Men
Rona Roberts	University of Louisville Department of Psychiatry
Donna Trabue,	Volunteers of America-Kentucky

To address the needs of special populations in the written standards, Louisville Metro Government consults and collaborates with agencies who serve those with mental illness, the chronically homeless, victims of domestic violence and sexual assault, transgender persons, and those who are affected by HIV/AIDS to provide input under the ESG Written Standards on how to best serve these vulnerable groups.

Louisville Metro Government maintains regular consultation with the CoC about program goals, operations, and standards, including common assessment implementation, single point of entry, and homeless participation.

**If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.**

Louisville Metro's Common Assessment Team is described in the written standards under "Policies and Procedures for Determining and Prioritizing Who Will Receive Homeless Prevention or Rapid Re-Housing."

**Identify the process for making sub-awards and describe how the ESG allocation is available to private nonprofit organizations (including community and faith-based organizations).**

The process for making ESG subawards is described in the written standards under "Process for Making Subawards."

**If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.**

Homeless participation is addressed in the written standards under "Homeless Participation Policy."

**Describe performance standards for evaluating ESG.**

Performance standards for evaluating ESG are described in the written standards under "Participation in HMIS and Performance Standards to Evaluate ESG Activities."

# **Appendix A: Proposed 2015 Action Plan Budget and Subrecipients**

**COMMUNITY DEVELOPMENT BLOCK GRANT - 2015 ACTION PLAN BUDGET**

ACTIVITY	BUDGETED AMOUNT	CATEGORY TOTALS
<b>HOUSING</b>		
Residential Programs Delivery	798,000	
Shawnee Portland Homeownership Incentive Program	400,000	
Ramp and Barrier Removal	175,000	
Shawnee Neighborhood Revitalization Strategy Area	800,000	
Affordable Housing Homeowner Unit Preservation	1,845,928	
Affordable Housing Rental Rehabilitation	1,000,000	
<b>Total Housing</b>		<b>5,018,928</b>
<b>RELOCATION</b>		
Relocation	20,000	
<b>Total Relocation</b>		<b>20,000</b>
<b>CLEARANCE</b>		
Vacant Properties Demolition	702,500	
<b>Total Clearance</b>		<b>702,500</b>
<b>PUBLIC SERVICE</b>		
Homeless Services	1,180,100	
Homeownership Counseling	80,100	
Family Economic Success Program	345,300	
<b>Total Public Service</b>		<b>1,605,500</b>
<b>PUBLIC FACILITIES AND IMPROVEMENTS</b>		
Louisville Central Community Center	500,000	
Oak Street Streetscape	300,000	
Huston Quin Park Improvements	510,000	
		<b>1,310,000</b>
<b>ECONOMIC DEVELOPMENT</b>		
Agribusiness Loans	157,472	
CS Economic Development Activities	419,600	
<b>Total Economic Development</b>		<b>577,072</b>
<b>ADMINISTRATION AND PLANNING</b>		
Urban Design/Landmarks	189,400	
CS/DL Department Services	1,355,200	
Human Relations - Fair Housing	70,000	
Urban League - Fair Housing	23,000	
Choice Planning Grant Match	100,000	
Coalition for the Homeless	80,000	
Indirect Cost	250,000	
<b>Total Administration and Planning</b>		<b>2,067,600</b>
<b>TOTAL CDBG 2015 ACTION PLAN BUDGET</b>		<b>11,301,600</b>

<u>2015 ACTION PLAN CDBG FUNDS</u>		<b>ROUNDED</b>
2015 Entitlement Funds	10,303,957	10,304,000
Funds Recommended for Re-Appropriation	47,200	47,200
FY16 Estimated Program Income	400,000	400,000
Prior Year Carryforward	16,606	16,600
FY15 CDBG Operating Carryforward Funds	533,846	533,800
<b>TOTAL 2015 ACTION PLAN CDBG FUNDS</b>	<b>11,301,608</b>	<b>11,301,600</b>

**CDBG 2014 ACTION PLAN BUDGET - CAP CALCULATIONS**

<u>Action Plan Category</u>	<u>Amount</u>	<u>% of Total*</u>
Public Service	\$ 1,605,500.00	15.00%
Administration & Planning	\$ 2,067,600.00	19.32%
<b>Total CDBG 2013 ACTION PLAN BUDGET*</b>	<b>\$ 10,703,957.00</b>	

\*The CDBG 2014 Action Plan budget of \$11,301,608 is comprised up of \$10,303,957 of entitlement funds, estimated program income of \$400,000 and a carryforward and reallocation net amount of \$597,651. The PS and Admin Caps are calculated based on entitlement and program income funds only.

15% Public Service Limit	\$ 1,605,593.55	Available	\$ 93.55
20% Admin & Planning Limit	\$ 2,140,791.40	Available	\$ 73,191.40

## COMMUNITY DEVELOPMENT BLOCK GRANT 2015 SUBRECIPIENT AGENCIES

<b>Subrecipient Agency</b>	<b>Program</b>	<b>Amount</b>
Bridgehaven, Inc.	Steps to Recovery	\$ 8,700
Center for Women and Families, The	Economic Success Program (ESP)	\$ 35,800
Center for Women and Families, The	Crisis Response Program	\$ 42,500
Family & Children First, Inc. dba Family & Childrens Place, Inc	SPC Case Management	\$ 230,000
Family Health Centers	SPC Case Management	\$ 34,300
Family Health Centers, Inc.	Phoenix Health Center Case Management	\$ 74,900
Family Scholar House, Inc.	At-Risk Family Services	\$ 53,800
Father Maloney's Boys' Haven, Inc. DBA Boys & Girls Haven	Independence Readiness Program	\$ 28,400
GuardiaCare Services, Inc.	Payee Program	\$ 40,200
Jeff Street Baptist Community at Liberty, Inc.	Hospitality Program	\$ 18,600
Kentucky Refugee Ministries, Inc.	Refugee Housing Coordination	\$ 38,400
Legal Aid Society	Tenants Assistance Program (TAP)	\$ 19,000
Legal Aid society	Housing counseling	\$ 26,700
Louisville Urban League	Housing counseling	\$ 53,400
Salvation Army	Emergency Shelter for Homeless Families	\$ 42,500
Seven Counties	SPC Case Management	\$ 49,000
Society of St. Vincent de Paul, Council of Louisville, Inc.	Mental Health/Substance Abuse Stabilization and Self-Sufficiency	\$ 25,300
St. John Center, Inc.	Emergency Shelter Social Services	\$ 115,600
Volunteers of America of Kentucky, Inc.	Family Emergency Shelter	\$ 35,100
Wellspring, Inc. dba Schizophrenia Foundation, KY, Inc.	Journey House PSH	\$ 20,600
Wellspring, Inc. dba Schizophrenia Foundation, KY, Inc.	Block & Gaines Crisis Stabilization Units	\$ 8,400
Wellspring, Inc. dba Schizophrenia Foundation, KY, Inc.	Murray-Baxter Permanent Supportive Housing	\$ 7,100
YMCA of Greater Louisville - Safe Place Services, The	YMCA Shelter House and Family Mediation Services	\$ 40,000
<b>Total CDBG Public Service Subrecipients</b>		<b>\$ 1,048,300</b>

<b>HOME INVESTMENT PARTNERSHIP PROGRAM - 2015 ACTION PLAN BUDGET</b>		
<b>ACTIVITY</b>	<b>BUDGETED AMOUNT</b>	
Community Housing Development Organization (CHDO)	\$	348,718
Affordable Housing Development	\$	2,022,182
Tenant Based Rental Assistance	\$	400,000
HOME Administration	\$	262,400
<b>Total HOME 2015 ACTION PLAN BUDGET</b>	<b>\$</b>	<b>3,033,300</b>

<b>2015 ACTION PLAN HOME FUNDS</b>			<b>ROUNDED</b>
2015 Entitlement Funds	\$	2,324,788	\$ 2,324,800
Funds Recommended for Re-Appropriation	\$	-	\$ -
FY16 Estimated Program Income	\$	300,000	\$ 300,000
FY15 HOME Operating Carryforward Funds	\$	679,794	\$ 679,800
Less FY15 TBRA Commitments	\$	(271,287)	\$ (271,300)
<b>TOTAL 2015 ACTION PLAN HOME FUNDS</b>	<b>\$</b>	<b>3,033,295</b>	<b>\$ 3,033,300</b>

## 2015 ACTION PLAN

<b>HOME 2015 ACTION PLAN BUDGET - CAP CALCULATIONS</b>		
<u>Action Plan Category</u>	<u>Amount</u>	<u>% of Total*</u>
Administration & Planning	<u>\$ 262,400.00</u>	<u>10.00%</u>
<b>Total HOME 2015 ACTION PLAN BUDGET*</b>	<b><u>\$ 2,624,788.00</u></b>	
<p>*The HOME 2015 Action Plan budget of \$3,033,295 is comprised up of \$2,324,788 of entitlement funds, estimated program income of \$300,000 and a net carryforward of \$408,507. The Admin Cap is calculated based on entitlement and program income funds only.</p>		
	10% Limit =	\$262,479 Available
		\$78.80

<b>EMERGENCY SOLUTIONS GRANT - 2015 ACTION PLAN BUDGET</b>		
<b>ACTIVITY</b>	<b>BUDGETED AMOUNT</b>	
Emergency Shelter	\$	456,300
Prevention	\$	45,000
Street Outreach	\$	94,100
HMIS	\$	-
Rapid Re-Housing	\$	267,200
ESG Administration (7.5%)	\$	64,500
<b>Total ESG 2015 ACTION PLAN BUDGET</b>	<b>\$</b>	<b>927,100</b>

**ESG 2015 ACTION PLAN BUDGET - CAP CALCULATIONS**

<u>Action Plan Category</u>	<u>Amount</u>	<u>% of Total*</u>
Administration & Planning (7.5%)	\$ <u>64,500</u>	<u>6.96%</u>
<b>Total ESG 2015 ACTION PLAN BUDGET</b>	<b>\$ <u>927,151</u></b>	
	<b>7.5% Limit \$ 69,536</b>	
	<b>Available \$ 5,036</b>	

## EMERGENCY SOLUTIONS GRANT 2015 SUBRECIPIENT AGENCIES

<b>Subrecipient Agency</b>	<b>Category</b>	<b>Amount</b>
Coalition for the Homeless - White Flag	Emergency Shelter	\$ 32,100
Family & Children First, Inc.	Rapid Re-Housing	\$ 48,000
Family Health Centers, Inc.	Street Outreach	\$ 57,100
House of Ruth, Inc.	Emergency Shelter	\$ 16,600
Jeff St Baptist at Liberty	Emergency Shelter	\$ 15,000
Legal Aid Society	Prevention	\$ 45,000
Salvation Army	Emergency Shelter	\$ 81,015
Society of St. Vincent de Paul, Council of Louisville, Inc.	Emergency Shelter	\$ 70,600
St. John Center, Inc.	Emergency Shelter	\$ 104,900
Volunteers of America of Kentucky, Inc.	Emergency Shelter	\$ 100,000
Wayside Christian Mission	Emergency Shelter	\$ 16,900
Wayside Christian Mission	Emergency Shelter	\$ 19,200
YMCA Safe Place Services	Street Outreach	\$ 37,000
<b><i>Total ESG Subrecipients</i></b>		<b><i>\$ 643,415</i></b>

## 2015 ACTION PLAN

<b>HOUSING OPPORTUNITIES FOR PERSONS WITH AIDS - 2015 ACTION PLAN BUDGET</b>		
<b>ACTIVITY</b>	<b>BUDGETED AMOUNT</b>	
Housing Assistance and Supportive Services	\$	559,500
HOPWA Administration (3%)	\$	17,100
<b>Total HOPWA 2015 ACTION PLAN BUDGET</b>	<b>\$</b>	<b>576,600</b>

## 2015 ACTION PLAN

<b>HOPWA 2015 ACTION PLAN BUDGET - CAP CALCULATIONS</b>			
<u>Action Plan Category</u>	<u>Amount</u>	<u>% of Total*</u>	<u>Calculation</u>
Administration & Planning	\$ <u>17,100</u>	<u>2.97%</u>	=\$17,100/\$572,250
<b>Total HOPWA 2015 ACTION PLAN BUDGET</b>	<b>\$ <u>576,546</u></b>		
	<b>3% Limit \$</b>	<b>17,296</b>	
	<b>Available \$</b>	<b>196</b>	

**HOUSING OPPORTUNITIES FOR PERSONS WITH AIDS GRANT  
2015 SUBRECIPIENT AGENCIES**

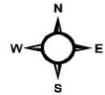
<b>Subrecipient Agency</b>	<b>Amount</b>
House of Ruth	\$ 346,100
Hoosier Hills AIDS Coalition	\$ 42,600
Volunteers of America	\$ 84,500
AIDS Interfaith Ministries	\$ 50,300
Legal Aid Society	\$ 36,000
<hr/>	
<b><i>Total HOPWA</i></b>	<b><i>\$ 559,500</i></b>

## Appendix B: Maps

# Portland NRSA Boundary



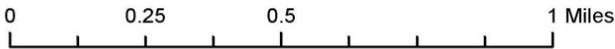
**Legend**  
Portland NRSA Boundary



4 of 22



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Housing and Family Services  
Karl Keeling  
January 6, 2011  
<portlandnrsuboundary>

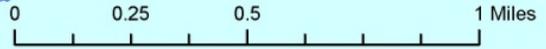


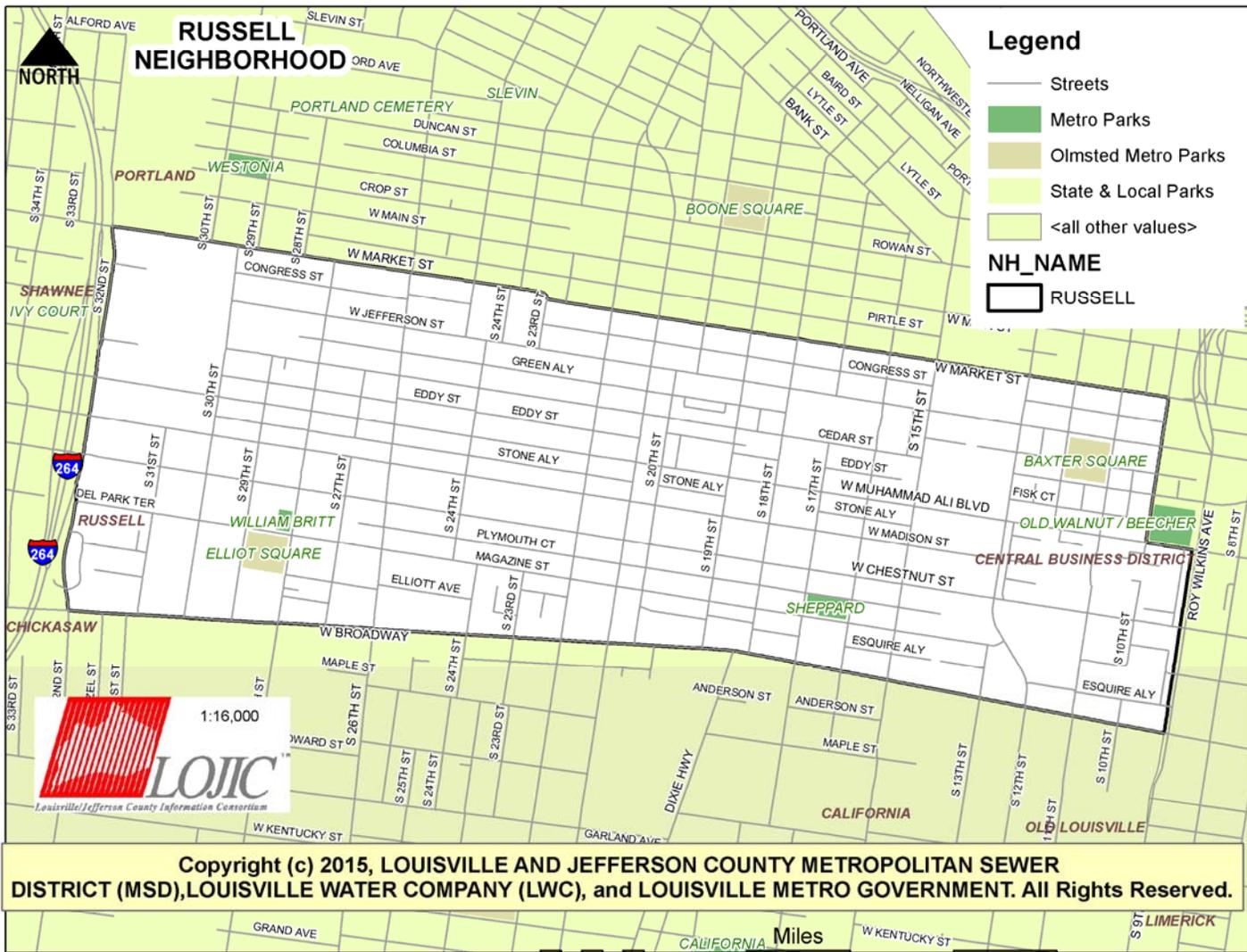
# NRSA - Shawnee



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Louisville Metro Government  
Community Services and Revitalization  
Al F. Humphries III  
4-6-12  
<Shawnee>





# 2013 Estimated Percent of Population at or Below Poverty Level by Household

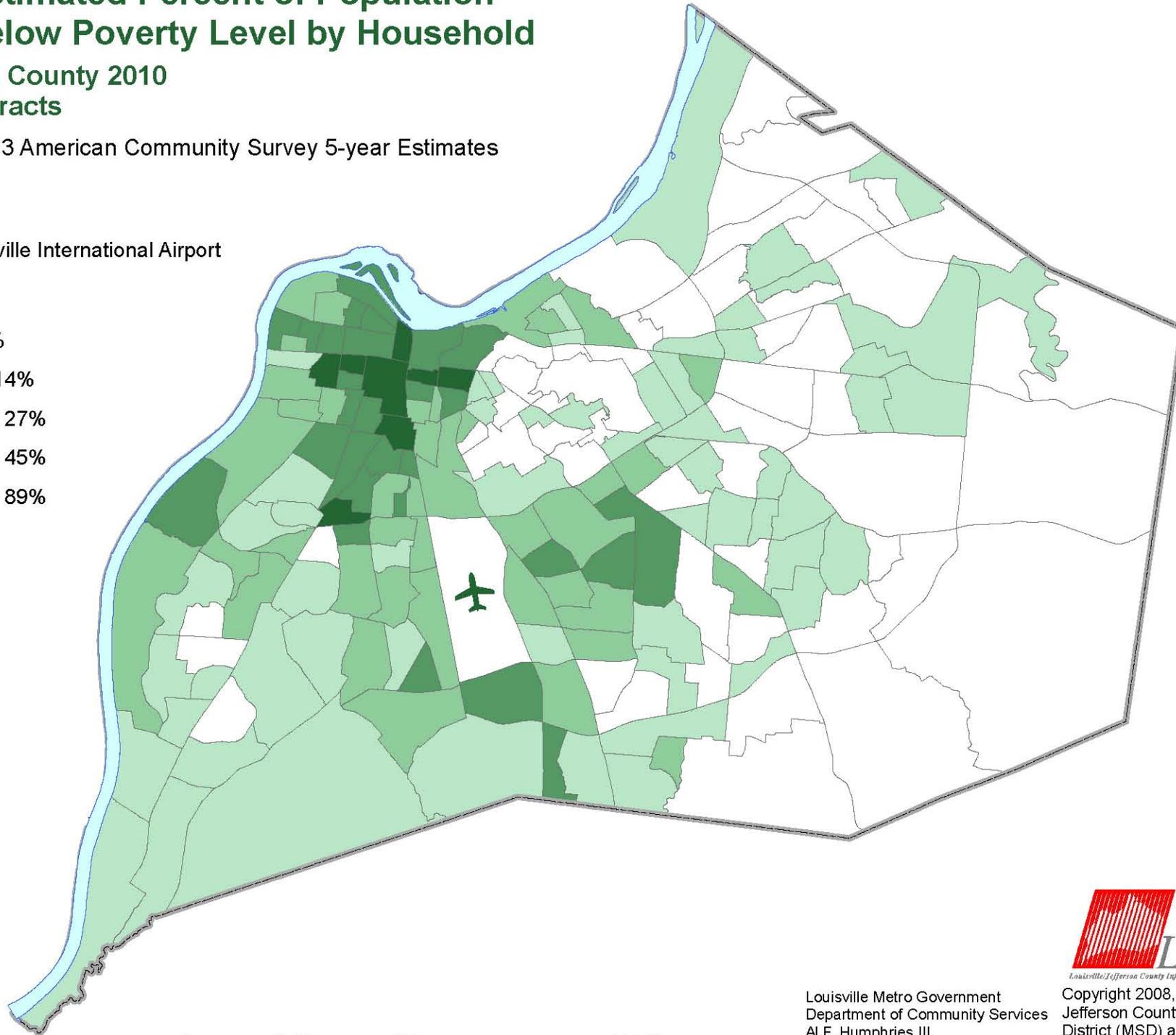
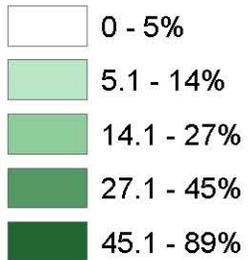
Jefferson County 2010  
Census Tracts

Source: 2013 American Community Survey 5-year Estimates

## Legend

 Louisville International Airport

## Percent



Louisville Metro Government  
Department of Community Services  
Al F. Humphries III  
3-30-2015  
<Percentage\_Families\_in\_Poverty>



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# 2013 Estimated Median Household Income

Jefferson County 2010 Census Tracts

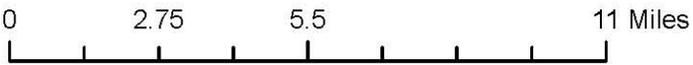
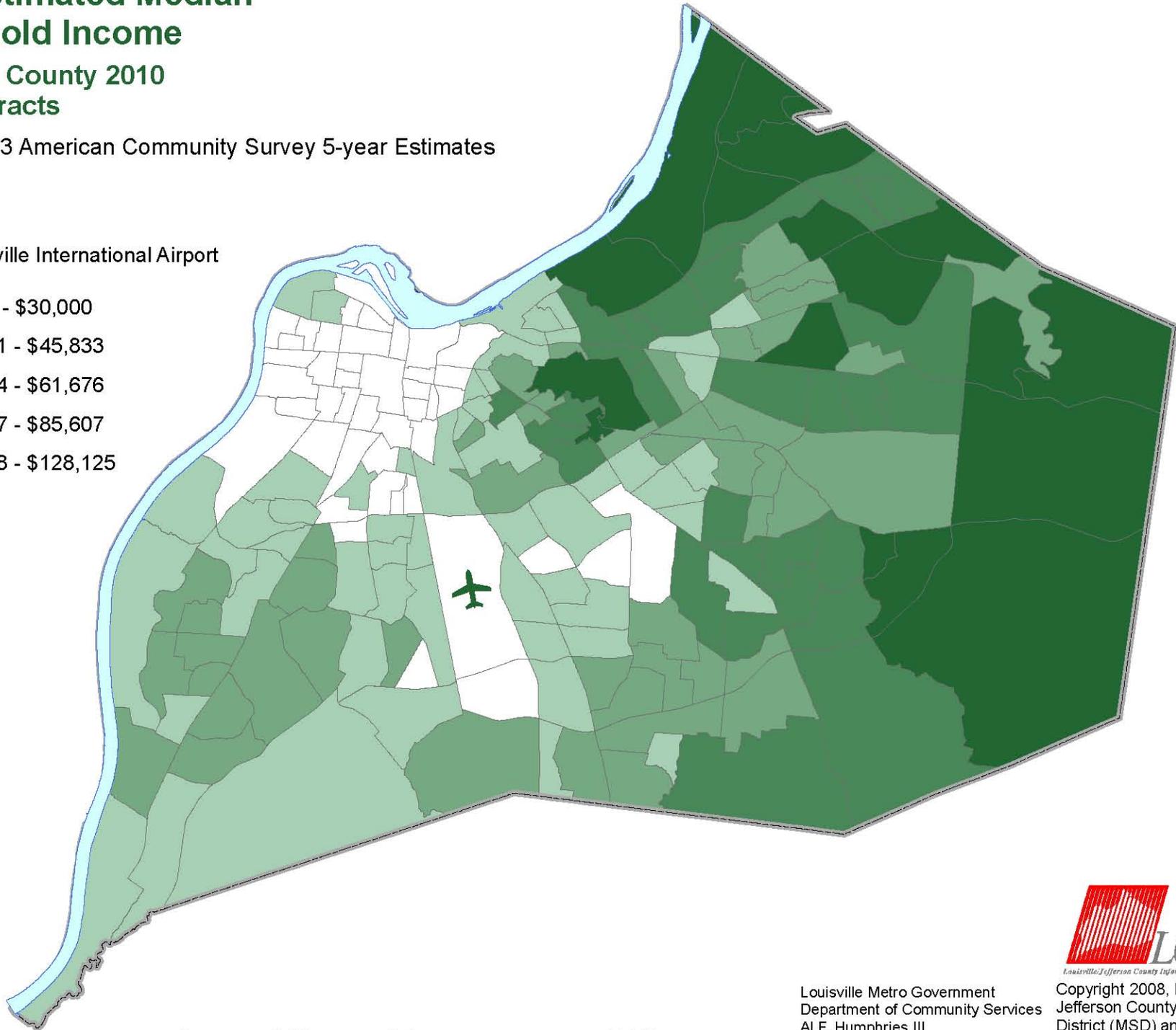
Source: 2013 American Community Survey 5-year Estimates

## Legend



Louisville International Airport

- 8,637 - \$30,000
- 30,001 - \$45,833
- 45,834 - \$61,676
- 61,677 - \$85,607
- 85,608 - \$128,125



Louisville Metro Government  
Department of Community Services  
Al F. Humphries III  
3-30-2015  
<MedianHousehold\_Income>



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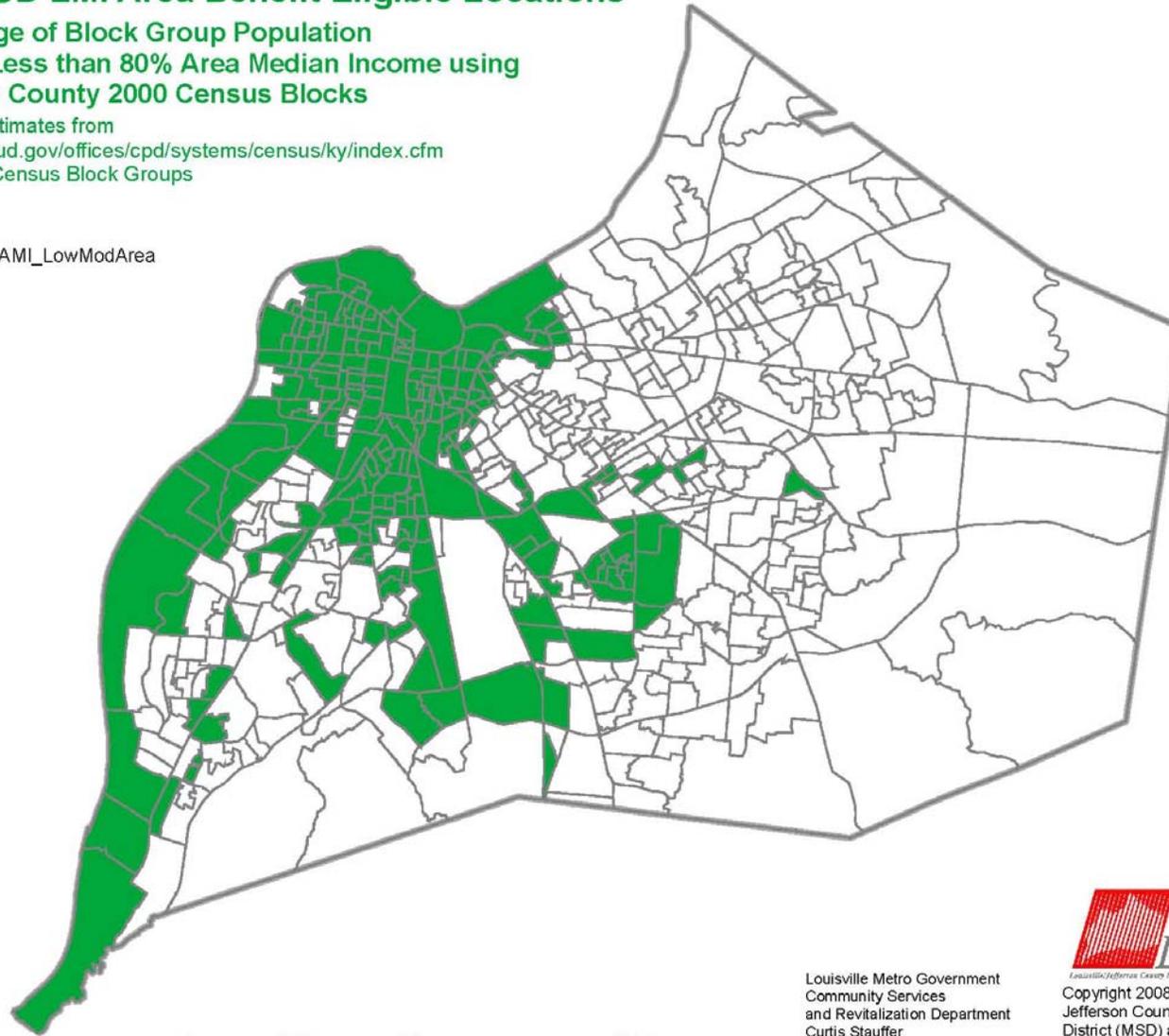
## 2013 HUD LMI Area Benefit Eligible Locations

Percentage of Block Group Population  
Earning Less than 80% Area Median Income using  
Jefferson County 2000 Census Blocks

2013 LMI Estimates from  
<http://www.hud.gov/offices/cpd/systems/census/ky/index.cfm>  
using 2000 Census Block Groups

### Legend

 HUD\_AMI\_LowModArea



Louisville Metro Government  
Community Services  
and Revitalization Department  
Curtis Stauffer  
Re-created 3-05-2014  
<HUD\_LMI\_Area>



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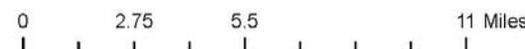
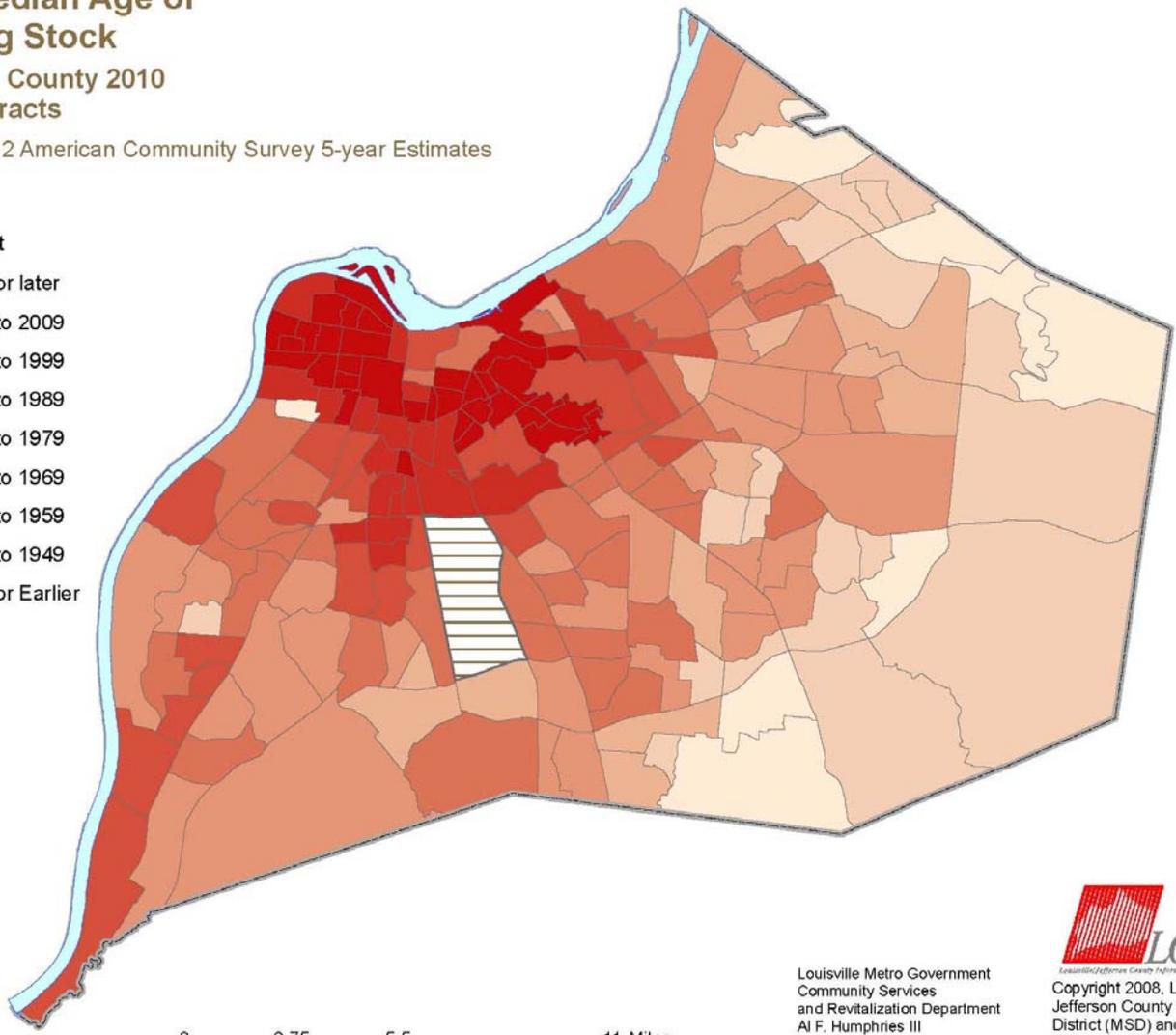
# 2012 Median Age of Housing Stock

Jefferson County 2010 Census Tracts

Source: 2012 American Community Survey 5-year Estimates

## Legend

-  Airport
-  2010 or later
-  2000 to 2009
-  1990 to 1999
-  1980 to 1989
-  1970 to 1979
-  1960 to 1969
-  1950 to 1959
-  1940 to 1949
-  1939 or Earlier



Louisville Metro Government  
Community Services  
and Revitalization Department  
Al F. Humphries III  
3-04-2014  
<MedianAgeHousingStock>



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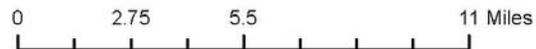
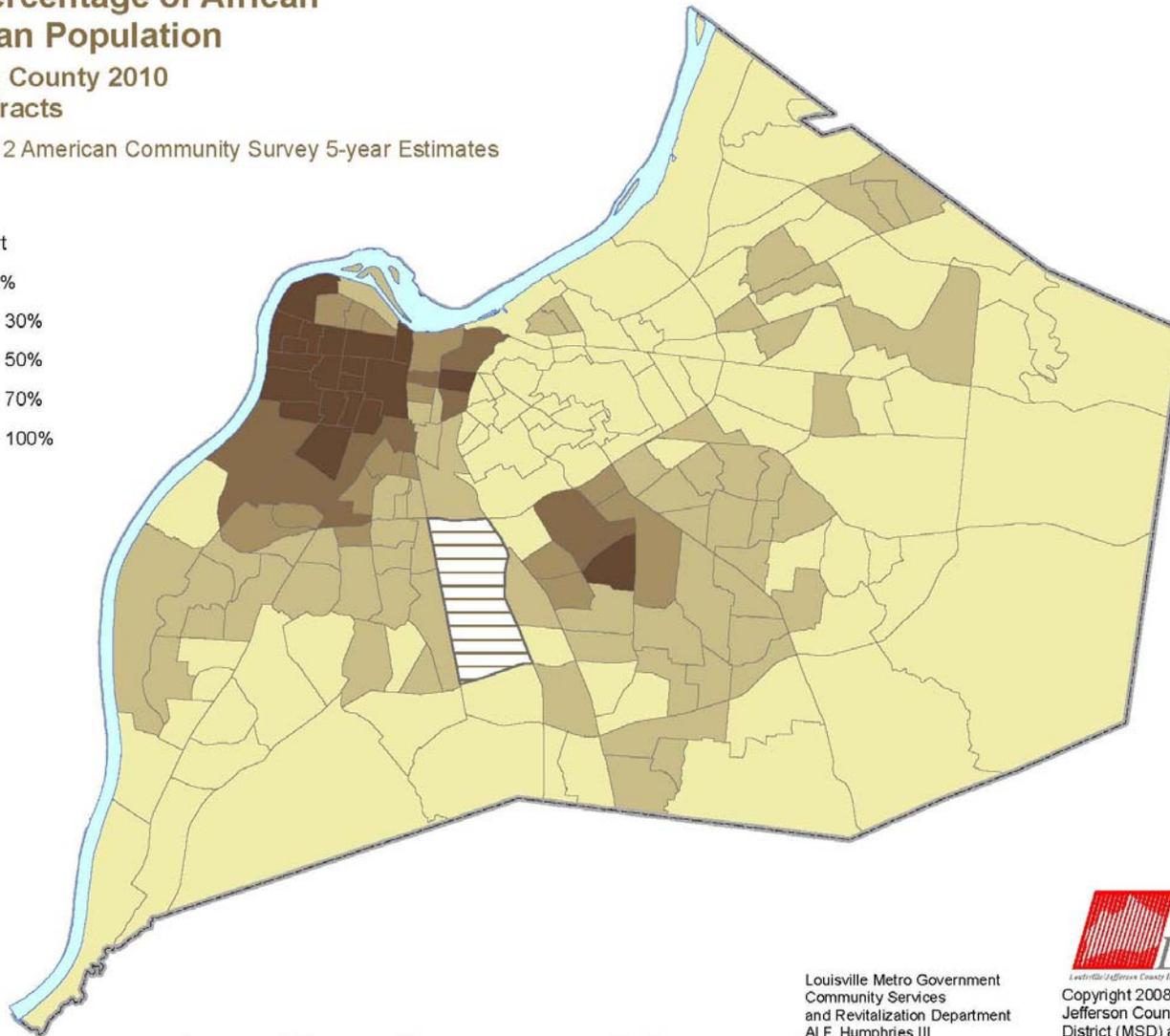
# 2012 Percentage of African American Population

Jefferson County 2010  
Census Tracts

Source: 2012 American Community Survey 5-year Estimates

## Legend

-  Airport
-  0 - 10%
-  10.1 - 30%
-  30.1 - 50%
-  50.1 - 70%
-  70.1 - 100%



Louisville Metro Government  
Community Services  
and Revitalization Department  
Al F. Humphries III  
3-04-2014  
<PercentageAfricanAmerican>



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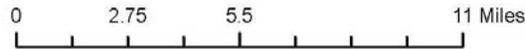
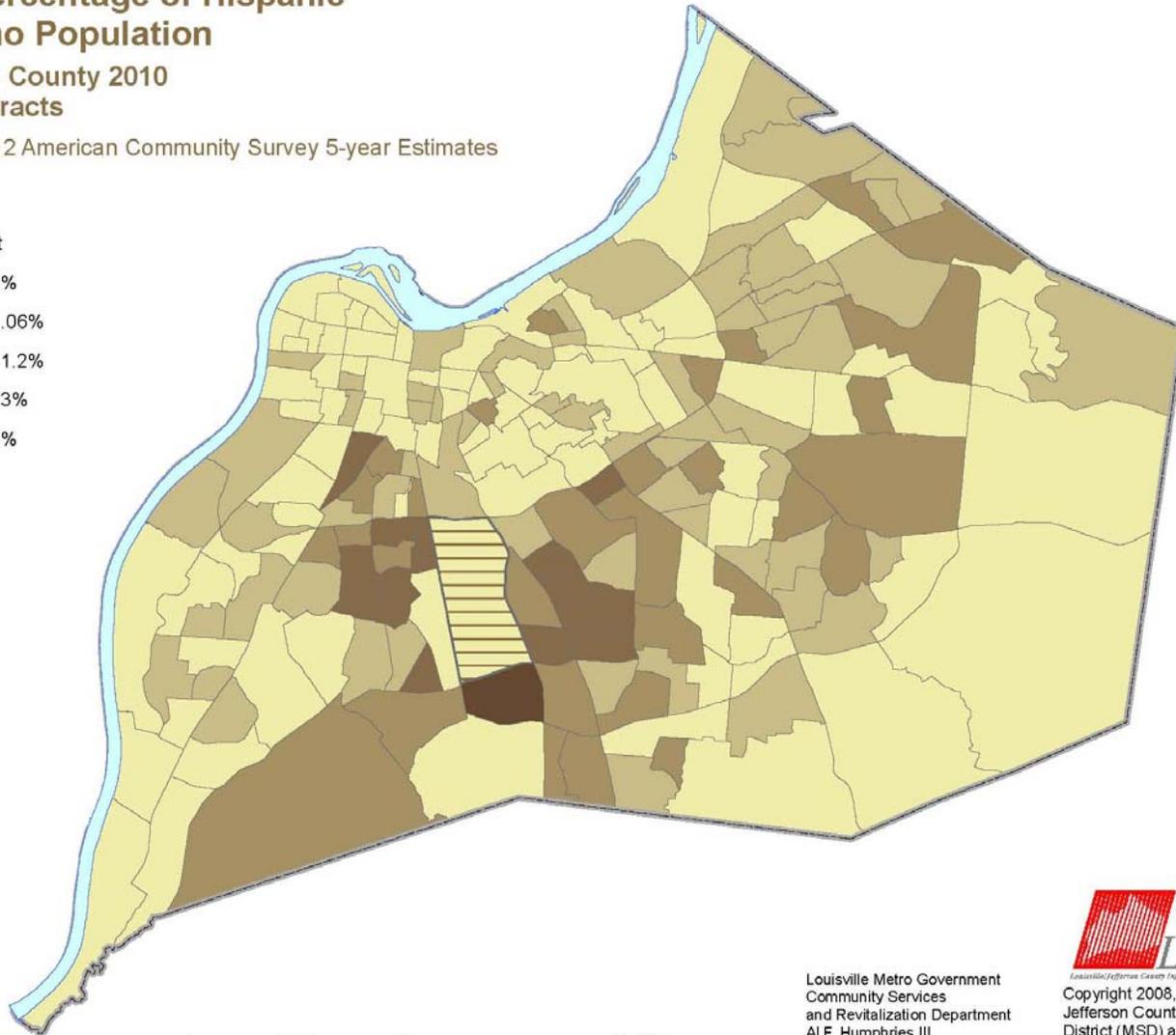
# 2012 Percentage of Hispanic or Latino Population

Jefferson County 2010 Census Tracts

Source: 2012 American Community Survey 5-year Estimates

## Legend

-  Airport
-  0 - .02%
-  .021 - .06%
-  .061 - 1.2%
-  1.21 - 3%
-  3.1 - 6%



Louisville Metro Government  
Community Services  
and Revitalization Department  
Al F. Humphries III  
3-04-2014  
<PercentageHispanicLatino>



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# **Appendix C: Citizen Participation and Comments Received**

PUBLIC HEARING NOTICE  
FOR CITIZEN PARTICIPATION  
IN DEVELOPING THE 2015-  
2019 CONSOLIDATED PLAN  
AND 2015 ACTION PLAN

Louisville Metro Government will hold a public hearing Monday, March 2, 2015 at 6:00 p.m. The public hearing will be held at Northwest Neighborhood Place at The Academy @ Shawnee, 4018 West Market Street, 40212. The focus of the hearing is the use of U.S. Department of Housing and Urban Development entitlement funds for the next five years. The purpose of HUD funds is to provide decent, affordable housing, ensure suitable living environments, and expand economic opportunities. For further information or to ensure reasonable accommodations are made for persons with disabilities or persons who are Limited English Proficient, please call Sandy Bottoms at (502) 574-8298.

THE COURIER-JOURNAL - A GANNETT COMPANY

STATE OF KENTUCKY

County of Jefferson

Affidavit of Publication

I, *Christine Manning*, of **COURIER-JOURNAL**, Inbound Special Services Representative, general circulation printed and published at 525 West Broadway, Louisville, Kentucky, do solemnly swear that from my own personal knowledge, and reference to the files of said publication, the advertisement of: Hearing Notice

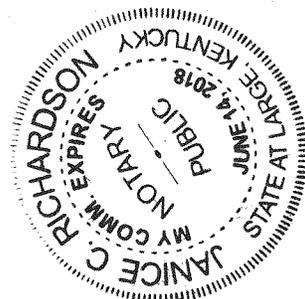
Title:	Public Hearing Notice	
Run Date(s):	2/18/2015	NEWSPAPER PRINT
Run Date(s):	2/18 - 2/24/2015	ONLINE

*Christine Manning, Inbound Special Services Representative*

Signature of person making proof

Subscribed and sworn to before me this 20th day of February 2015

*Janice C. Richardson, Notary Public*



## **Summary of Public Comments**

**Develop Louisville, Office of Housing and Community Development Public Hearing**

**March 2, 2015, 6:00 PM**

**Northwest Neighborhood Place / The Academy @ Shawnee, 4018 West Market Street**

**Office of Housing and Community Development Director Virginia Peck** gave a presentation outlining:

- The goals of Louisville Metro Government, Develop Louisville, and the Office of Housing and Community Development
- The background, purpose, and process of the Consolidated Plan, Action Plan, and CAPER
- The funding sources covered by the Consolidated Plan, Action Plan, and CAPER
- Louisville Metro Government's citizen engagement efforts for the 2015-2019 Consolidated Plan and 2015 Action Plan
- The timeline for developing the 2015-2019 Consolidated Plan and 2015 Action Plan

Ms. Peck invited questions from attendees.

**Cathy Hinko, Metropolitan Housing Coalition**, noted that the Analysis of Impediments to Fair Housing Choice will also be out for public comment along with the Consolidated Plan and Action Plan.

**Attendee #1** inquired about the definition of community development and how job creation fits into this process.

Ms. Peck responded that community development means taking a comprehensive approach – it may be sidewalks, a community center, or public services – along with housing. Economic Development and community development are interrelated. Healthy neighborhoods and healthy environments make a community more appealing for potential economic development – companies considering coming to Louisville want to know that employees will be safe, have places to live, have access to public transportation, etc.

**Attendee #2** expressed concern about referring to economic development as companies moving in as opposed to growing businesses within the community.

Ms. Peck agreed that business growth within the community is important as well. Louisville Metro works with local contractors to do weatherization, lead removal, etc. and this certainly has an economic impact.

**Louisville Metro Government Response:** *Louisville Metro agrees that growing businesses within the community is important and has identified Small Business Development as a high priority need in its Consolidated Plan. Additionally, Metro has designated funding for micro-enterprise development, small business development, and micro-enterprise technical assistance in its 2015 Action Plan budget.*

**Jim Mims, Director of Develop Louisville**, addressed attendees. Mr. Mims stated that housing, and especially affordable housing, is vitally important to the community. Metro wants to see affordable housing in East Louisville as well as market rate housing in West Louisville to encourage income diversity in neighborhoods. Metro is attempting this through its Urban Homesteading project, which uses financial incentives to encourage people who would consider buying homes to consider Shawnee along with other up-and-coming neighborhoods. Metro wants to see abandoned properties acquired and utilized for the benefit of the surrounding neighborhoods. Metro wants to see catalytic projects like the Choice Neighborhoods Planning Grant project and FoodPort development that will help connect areas west of Ninth Street to each other and to the rest of the city.

Attendee #1 suggested referring to the Innovation District model (identified in a Brookings Institution report) that takes a holistic approach to community and economic development.

Mr. Mims and Ms. Hinko brought up Metro's impending Comprehensive Plan update and Metro's desire to include elements of Vision Louisville, Sustain Louisville, Move Louisville, the Consolidated Plan, and other relevant planning processes in the Comprehensive Plan in order to ensure that Metro takes a cohesive approach to shaping the community's future.

Attendee #1 stated that in the past there was a focus on building infill housing, but today many of those homes now sit vacant even though they are only 10 to 15 years old. Building housing alone isn't enough – bringing jobs to the neighborhood is important so that people can afford housing and utility costs. While FoodPort is definitely a start, one project won't solve the problem when there are thousands of unemployed people in the neighborhood.

Ms. Hinko noted that children who experience housing instability often perform poorly in school compared to children with stable housing. Stable, affordable housing is a vital piece of the puzzle when it comes to jobs.

**Attendee #3** agreed that housing without economic development is not enough and stated that the Center for African American Heritage, Louisville Central Community Center, and proposed projects like YMCA, FoodPort, and Walmart are regional draws. Attendee suggested that connecting those resources using infrastructure improvements could be a way to stretch dollars further and see concentrated results.

Ms. Peck called forward those attendees who had signed up to speak.

The first person to speak was Cathy Hinko with Metropolitan Housing Coalition. Ms. Hinko's verbal comments are summarized below. Written comments were submitted after the meeting.

- Existing plans such as Move Louisville, Vision Louisville, Sustain Louisville, 20-Year Action Plan to Further Fair Housing should guide the Consolidated Plan. Integrating all these plans will help pave the way for a synthesis of plans in reality.

- Suggested changes from what has appeared in past plans:
  - CDBG funds shouldn't be spent on basic government services such as property inspections. These programs should be funded by taxes. Using CDBG funds implies that Metro would not provide those services in low and moderate income areas were CDBG funds unavailable.
  - Funds are limited and should be spent on bricks and mortar projects, not tenant-based rental assistance, case management, scholarships other those for preschool, etc.
- Five suggested priority areas (in no particular order):
  - Fair housing in areas that have by law or by practice excluded people in protected classes
  - Create real estate value in areas with concentrations of people in protected classes
  - Reuse of abandoned properties
  - Creating the ability to have more affluence in low income households
  - End homelessness
- Recommendations for this plan:
  - Provide incentives for developing affordable housing in areas where there is not already a high concentration of low-income people
  - Create a loan pool for home repairs and improvements for homeowners who may not be eligible for traditional loans
  - Focus funding for facility improvements on Metro-owned facilities
  - Experiment with recommendations from RKG/Vacant and Abandoned Properties report and fund land bank if applicable state legislation passes
  - Prioritize home energy efficiency improvements in older and poorer neighborhoods
  - Funds should be used to make housing permanently affordable wherever possible
  - Don't make forgivable loans to businesses
  - Devote some funds to education and changing attitudes toward affordable housing

*Please see Ms. Hinko's written comments dated March 3, 2015 for Metro's response.*

**Attendee #2** noted that it would be helpful if Metro provided a list of plans in a central location online.

The second speaker was **Tom Moffett, Kentucky Alliance Against Racist and Political Repression**. Mr. Moffett stressed the importance of rehabilitating existing homes and noted that this may be a particular issue for elderly homeowners. Mr. Moffett noted the impact of vacant properties on neighboring property values. Mr. Moffett suggests a loan program for people interested in purchasing and rehabilitating existing homes, perhaps in targeted areas like Shawnee or Smoketown.

**Louisville Metro Government Response:** *Metro agrees that rehabilitation of existing homes is important. Metro has included funding for rehabilitation of owner-occupied units in its final 2015 Action Plan budget and will continue to support its emergency and exterior repair, weatherization, and NRSA rehabilitation programs for income-eligible homeowners. Metro's new Shawnee and Portland Homeownership*

*Incentive Program is included in the final 2015 Action Plan budget and offers repair funding to individuals purchasing homes in targeted areas of Shawnee and Portland.*

The third speaker was **David Fannin of New Directions Housing Corporation**. Mr. Fannin recommends placing emphasis on rehabilitation of existing owner-occupied housing, which will allow people who want to stay in their homes to do so. Mr. Fannin also submitted written comments to this effect.

*Please see Mr. Fannin's written comments dated April 16, 2015 for Louisville Metro's response.*

The fourth speaker was **Judy Schroeder, a Portland neighborhood resident**. Ms. Schroeder spoke about the need for investment in West Louisville to stabilize neighborhoods and support resident owners. The recent investment in Portland and new possibilities for private investment are good for the neighborhood but have resulted in landlords who are attempting to capitalize on new investments by raising rents so that longtime renters are in danger of being priced out. There is a need for equilibrium – healthy neighborhoods have housing at all price points, both owners and renters, and are accessible for all income levels.

Ms. Schroeder recommends:

- Protecting value by supporting coherent zoning, design standards, code enforcement, and selective demolition
- Making visible, concentrated corridor investments – Market Street, Main Street, Portland Avenue, and Bank Street – to welcome people from the rest of the city
- Avoiding demolition without a plan for repurposing parcels
- Supporting energy efficient home rehabilitation
- Expanding urban homesteading options to include current neighborhood residents as well as potential residents
- Potentially developing a loan pool for helping people afford property taxes

***Louisville Metro Government Response:*** *Metro appreciates Ms. Schroeder's insightful comments. Metro has utilized a corridor approach in its Shawnee NRSA rehabilitation program which is intended to facilitate concentrated and visible improvements. Metro plans to continue its rehabilitation programs, including emergency and exterior repair, weatherization, and NRSA rehabilitation programs for income-eligible homeowners in Program Year 2015. Metro's demolition program utilizes a selective approach to clear vacant and abandoned properties so that lots can be put back into productive use. Metro agrees that incentive programs for homeownership should be available to current residents as well as potential residents. The Shawnee and Portland Homeownership Incentive Program offers repair funding for those purchasing homes within the neighborhood, regardless of whether they are new or existing residents.*

The fifth and final speaker on the sign-in sheet was **Bonnie Cole of the Shawnee Neighborhood Association**. Ms. Cole spoke to the importance of addressing concerns expressed in the Shawnee Neighborhood Plan. Ms. Cole suggested utilizing funds for turning the former YMCA site into a community center type facility and a safe place for neighborhood children. Ms. Cole also expressed a desire for businesses to come to the area, but believes the neighborhood should have a say in the type of businesses that come in. Finally, Ms. Cole expressed concern over vacant properties and maintaining single-family homes.

**Louisville Metro Government Response:** *Metro thanks Ms. Cole for her comments. Metro has identified non-housing community development and small business development as priorities in its new Consolidated Plan and has proposed several related programs in Program Year 2015, including micro-enterprise technical assistance and micro-enterprise/small business development. Public facilities projects are determined on annual basis. Metro will continue to fund its rehabilitation programs, including emergency and exterior repair, weatherization, and NRSA rehabilitation programs for income-eligible homeowners in Program Year 2015.*

Councilwoman Cheri Bryant Hamilton (District 5) expressed interest in knowing more about Metro's accomplishments and performance under these programs. Ms. Peck noted that HUD provides Metro with annual feedback based on reports and monitoring, which along with public input helps Metro shape its future programs.

**Louisville Metro Government Response** *Annual reports on Consolidated Plan activities (CAPERs) are submitted to HUD and are made available to the public on the Office of Housing and Community Development's (HCD) website. Hard copies can be requested by contacting HCD.*

Councilwoman Hamilton noted that non-housing projects such as facilities improvements can be funded through these sources as well, and stated that these projects help stabilize communities and should be included.

Ms. Schroeder noted the limited nature of these funds and the importance of funding public services.

**Attendee #4** inquired as to what the process for synthesizing public input into the Consolidated Plan is. Ms. Peck responded that public input from meetings, written comments, consultations with stakeholders, data analysis, and reviews of existing plans are compiled in order to identify priority areas and goals for the plan. A draft plan is then developed and released for a 30-day public comment period, after which comments are considered, the plan is finalized, and the plan is submitted to HUD.

**Attendee #5** expressed a concern that while a good planning process is in place, Shawnee residents are not always kept informed about progress toward implementing the neighborhood plan.

Attendee #1 reiterated the importance of job creation and economic development in community development and improving neighborhoods.

Councilwoman Hamilton noted the absence of a Shawnee neighborhood liaison, a position which previously existed under the Shawnee NRSA program.

Ms. Peck thanked attendees for coming and called the meeting to a close.

## **Summary of Public Comments**

### **Develop Louisville, Office of Housing and Community Development Public Meeting**

**April 6, 2015, 6:00 PM**

**Urban Government Center, 810 Barret Avenue**

**Office of Housing and Community Development Acting Director Laura Grabowski** gave a presentation outlining:

- An overview of Develop Louisville and the goals of the Office of Housing and Community Development
- The background, purpose, and process of the Consolidated Plan, Action Plan, and CAPER
- The funding sources covered by the Consolidated Plan, Action Plan, and CAPER
- Louisville Metro Government's citizen engagement efforts for the 2015-2019 Consolidated Plan and 2015 Action Plan
- The timeline for developing the 2015-2019 Consolidated Plan and 2015 Action Plan and instructions for submitting written comments

Ms. Grabowski noted that no attendees signed up to speak and invited questions or comments from the group.

**Cathy Hinko, Metropolitan Housing Coalition**, inquired about coordination with Louisville Metro Housing Authority's Moving to Work plan. Ms. Hinko noted that LMHA sets aside \$7 million of its Section 8 budget for non-voucher uses, and suggested that it may be helpful if LMHA and Louisville Metro coordinated on housing-related goals for maximum impact.

**Randy Webber, Wayside Christian Mission**, noted that while HUD is interested in seeing ESG and CoC funds used to help homeless persons gain employment and increase their incomes where possible, however there is no statutory requirement for coordinating with the public housing authority on these programs.

**Jim Mims, Director of Develop Louisville**, discussed Metro's current coordinated efforts with LMHA on the Choice Neighborhoods Planning Grant and other Russell neighborhood initiatives such as FoodPort and addressing vacant and abandoned properties.

Ms. Hinko brought up LG&E's proposed energy fee and rate changes, which she believes will work against Metro's energy efficiency initiatives and negatively affect housing affordability. Ms. Hinko suggests that Metro and LG&E should work together to address this issue.

Ms. Grabowski thanked attendees for coming and brought the meeting to a close.

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County of Jefferson

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Hearing Notice

Title: Public Comment Notice

Run Date(s): 4/10/2015

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Run Date(s): 4/10 - 4/16/2015

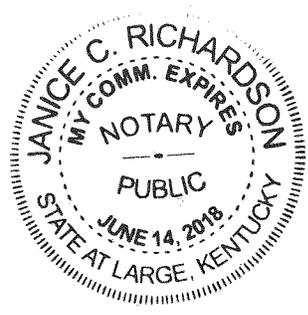
ONLINE

*Christine Manning, Inbound Special Services Representative*

Signature of person making proof

Subscribed and sworn to before me this 15th day of April 2015

*Janice C. Richardson, Notary Public*



**PUBLIC COMMENT NOTICE  
FOR CITIZEN INPUT ON THE  
DRAFT 2015-2019 CONSOLIDATED PLAN AND  
2015 ACTION PLAN FOR U.S. DEPT. OF HOUSING AND  
URBAN DEVELOPMENT FUNDING**

Louisville Metro Government will hold a Public Hearing Monday, April 27, 2015, at 6:00pm in the Mayor's Gallery on the 4th Floor of Metro Hall, 527 W. Jefferson Street. The purpose of the hearing is to receive citizen comments on the drafts of Metro's 2015-2019 Consolidated Plan, 2015 Action Plan, 2015 Analysis of Impediments to Fair Housing Choice, Citizen Participation Plan, and proposed Neighborhood Revitalization Strategy Areas (NRSAs). These documents govern the use of U.S. Department of Housing and Urban Development entitlement funds, including Community Development Block Grant, HOME Investment Partnership, Emergency Solutions Grant, and Housing Opportunities for Persons with AIDS. The purpose of entitlement funds is to provide decent, affordable housing, ensure suitable living environments, and expand economic opportunities, primarily for low and moderate income persons.

Louisville Metro Government expects to receive approximately \$14,000,000 from the aforementioned funding sources for the 2015 Program Year (July 1, 2015 - June 30, 2016).

The plans propose a Neighborhood Revitalization Strategy Area for concentrated redevelopment efforts in the Russell neighborhood. Additional public hearings will be held during the future development of a Russell NRSA plan.

The draft documents will be available beginning April 13 online at <http://louisvilleky.gov/government/housing-community-development>. Hard copies will be available at all branches of the Louisville Free Public Library and at all Neighborhood Place sites. Copies will also be available at the Urban Government Center (810 Barret Avenue, Suite 240) and the Metro Development Center (444 South 5th Street, 5th Floor).

There will be a public comment period, which will end on Wednesday, May 13, 2015. Citizens may submit written comments on the Consolidated Plan, Action Plan, and other documents via email to [sandra.bottoms@louisvilleky.gov](mailto:sandra.bottoms@louisvilleky.gov) or via US Mail to Develop Louisville, Office of Housing and Community Development, ATTN: Sandy Bottoms, 444 S. 5th Street, 5th Floor, Louisville, KY 40202.

For further information or to ensure reasonable accommodations are made for persons with disabilities or persons who are Limited English Proficient, please call Sandy Bottoms at 502-574-8298 or email [sandra.bottoms@louisvilleky.gov](mailto:sandra.bottoms@louisvilleky.gov).

## **Summary of Public Comments**

**Develop Louisville, Office of Housing and Community Development Public Hearing**

**April 27, 2015, 6:00 PM**

**Mayor's Gallery, 527 W. Jefferson Street, 4<sup>th</sup> Floor**

**Office of Housing and Community Development Acting Director Laura Grabowski** gave a presentation outlining:

- An introduction of Develop Louisville and the Department of Community Services, the lead agencies for managing HUD entitlement funds
- The background and purpose of the Consolidated Plan, Action Plan, and CAPER
- Highlighted accomplishments from the first four Program Years of the current Consolidated Plan
- The funding sources covered by the Consolidated Plan and Action Plan and allocations for Program Year 2015
- The needs and goals identified in the draft 2015-2019 Consolidated Plan and 2015 Action Plan
- The timeline for finalizing the 2015-2019 Consolidated Plan and 2015 Action Plan and instructions for submitting written comments

Ms. Grabowski then called forward those who had signed up to speak:

**Cathy Hinko of the Metropolitan Housing Coalition** presented the following comments:

Ms. Hinko noted that she appreciates Metro's support of the 20 Year Action Plan to Further Fair Housing and that MHC will support Metro's social media efforts as outlined in the Citizen Participation Plan.

Ms. Hinko applauded Metro's decision to exclude funds for code enforcement activities from its 2015 Action plan budget, noting that the failure to include this activity puts nearly \$1 million in CDBG funds back on the table for other programs.

Ms. Hinko recommended that the Analysis of Impediments to Fair Housing Choice be woven throughout the Consolidated Plan, for instance in addressing the needs of protected classes such as disabled persons and female-headed households.

Ms. Hinko suggested referencing LMHA's Moving to Work plan in the Consolidated Plan and noted that LMHA takes \$7 million every year out of its Section 8 voucher budget for other programs. Thousands of families could be assisted with this funding. Metro's HOME funds should be spent on "bricks and sticks" and not to attempt make up for the funds taken out of Section 8 through TBRA.

Ms. Hinko expressed concern that only \$400,000 over five years was designated for energy efficiency improvements in the Consolidated Plan, although this was identified as a goal.

Ms. Hinko recommended looking at ways to measure the economic impact of targeted investment in Portland, Russell, and Shawnee.

Ms. Hinko recommended adding counseling or training on acquiring and reusing vacant properties in addition to homeownership counseling.

Finally, Ms. Hinko noted for other attendees that the portion of the plan which describes where the money will be spent is only about two pages and encouraged all to review it.

***Louisville Metro Government response:*** *Louisville Metro thanks Ms. Hinko for her comments and appreciates MHC's general support of its Consolidated Plan. Metro has made efforts to include more information specific to protected classes such as disabled persons and immigrants in its final Consolidated Plan. Metro understands Ms. Hinko's concerns about Tenant-Based Rental Assistance (TBRA) but considers it a necessity due to current economic conditions and the high demand for affordable rental units. Louisville Metro understands Ms. Hinko's concerns about the small amount of CDBG funds designated for energy efficiency improvements and wishes to clarify that CDBG funds are used to supplement funds from the Department of Energy, which are the primary funding source for Metro's weatherization activities. Metro agrees that measuring economic impact of its targeted investments is important and is taking on this research as part of its ongoing NRSA efforts in Shawnee and Portland. Finally, Metro agrees with Ms. Hinko's recommendation regarding training on acquiring and reusing vacant properties and is communicating internally to determine the best way to accomplish this goal. Louisville Metro thanks Ms. Hinko once again for her comments and continued involvement in the planning process.*

Ms. Grabowski noted that no other attendees had signed up to speak and invited forward any additional speakers.

Ms. Grabowski called the meeting to a close.

## **Written Comments Received March 2, 2015 through April 12, 2015**

**Cathy Hinko, Executive Director, Metropolitan Housing Coalition**

**Submitted via E-Mail on March 3, 2015**

Thank you for the opportunity to help the department plan for the next five year. There are so many other planning processes that Louisville Metro is engaged in developing, we certainly hope that reference is made to them all. There should be an accountability between the various plans mentioned and this Five Year Plan.

The 20-Year Action Plan to Further Fair Housing lays out action steps which should be referenced in all parts of the Consolidated Plan. This is true as well for the other plans, such as Move Louisville, the Sustainable Louisville Plan, Vision Louisville or the changes to the Land Development Code or the Comprehensive Plan of the Land Development Code. Most of these plans are on the Louisvilleky.gov web site.

**Change Past Priorities:**

In the past, there has been a great deal of funding spent on basic government functions. An example is the \$900,000 given to perform regular inspections of property. This is not extraordinary action, just regular government action which is performed in all parts of Louisville. The CDBG money should not be spent on normal government responsibilities that are performed for all parts of Louisville. This implies that Louisville would deny performing those activities in the areas covered by CDBG. Since these are areas that are dominated by racial minorities and/or female headed households and/or persons with disabilities, this implies that Louisville would discriminate against these classes protected by both Fair Housing and Public Accommodations laws and not give them the same services given elsewhere.

Tenant Based Rental Assistance does nothing to increase the net balance of units that are and remain affordable for low-income households. Since the HOME funds have been diminishing, this diversion into rental payments instead of creating affordable units is a mistake.

Although case management is not a top rated need, there is an enormous amount of money spent on it and all in-house. This needs to be reviewed to see if a more effective combination of activities comprising "case management" but actually meeting needs identified by the community could be devised.

The scholarships that are not for pre-school should be terminated. There are avenues for scholarships for college that are available and assistance in applying for them is a better use of funds than a few scholarships.

**Recommended Priorities:**

In 2015, our needs are clear: a. fair housing opportunities in areas that have, by law and/or by practice, excluded people in protected classes; b. creating real estate value in areas with concentrations of people

in protected classes; c. re-use of property that has been abandoned and hazardous; d. creating the ability to have more affluence in low-income households e. ending housing instability.

a. Fair housing in areas that do not have affordable housing opportunities

Specific funding for those who follow the LIHTC QAP of Kentucky Housing Corporation and forgo Qualified Census Tracts and the bonus to be able to put affordable housing in areas that do not have affordable rental housing.

b. Creating real estate value in areas that have lost value

A loan pool based on ability to pay and credit score for improvements and/or maintenance of a home in an area with loss of value which undermines having collateral.

NOTE: At the hearing several people spoke about helping seniors/ persons with disabilities who are on low fixed incomes maintain basic standards. This seems like a good plan for targeted neighborhoods that have lost real estate value.

Louisville Metro owned facilities need to be the priority in community centers. This is shown in the current plan and needs to remain the priority. Metro facilities do not have the ability to have fund raisers and get donations that privately owned facilities have. Metro funds should be used to keep Metro facilities up to date.

c. Re-use of property that has been abandoned and is deteriorated

Use of funds to help RKG Report recommendations

Fund the Land Bank once it is reformed through legislation.

d. Creating the ability to have more affluence in low-income neighborhoods

Louisville Metro now collects a franchise fee on gas usage, thereby unduly benefiting from older and poorer neighborhoods (most often with concentrations of people in protected classes) which were built before the Building Code required insulation. In the past, your community process identified that utility bills were the second greatest cost for households, yet there is a lackluster commitment to energy efficient rehabilitation programs. This lack of commitment comes despite the Sustainable Louisville goal of lowering energy usage by 25%. The disconnect between the goals of different Louisville Metro departments and from the realities of consumers is unfortunate. Now that the city actually gets more money out of the families of poor children living in energy sieves, the city should not be too ghoulish in welcoming that money- instead the city should have a very visible commitment to energy efficient rehab in those areas.

“Forgivable Loans” for micro-enterprise is just another term for grants. No business “loan” should be forgivable. There is progress in this, but the exception for the targeted areas is not helpful.

e. Ending housing instability

With so little money available, funds should be used to make housing permanently affordable wherever possible. About 8% of all JCPS students experience housing instability in one school year. THAT IS AN AFFORDABLE HOUSING PROBLEM!

***Louisville Metro Government Response:*** *Louisville Metro agrees that its many plans should reference and complement one another. Metro's final Consolidated Plan references many other Metro plans, including both existing documents and those which are planned or in progress.*

*Metro has not included funds for code enforcement in its 2015 Action Plan budget and has instead increased funds for other eligible projects.*

*Metro understands Ms. Hinko's concerns about Tenant-Based Rental Assistance (TBRA) but considers it a necessity due to current economic conditions and the high demand for affordable rental units.*

*While the Department of Community Services continues to support educational attainment through scholarship programs for income-eligible persons and families, Metro does not utilize the funding sources covered by the Consolidated Plan for scholarships.*

*Metro strategically plans to balance the deconcentration of poverty with the challenges related to vacant and abandoned property inventory. Several of Metro's programs, including downpayment assistance, the non-income-restricted Shawnee-Portland Homeownership Incentive Program, and the use of non-federal funds for facilitation of market-rate housing in historically low/mod census tracts, are specifically designed to allow opportunities in non-impacted areas.*

*Metro will continue to fund its emergency repair, weatherization, ramp, and NRSA rehabilitation programs in Program Year 2015. With the exception of NRSA rehabilitation, these programs are available metrowide for income-eligible households.*

*Louisville Metro has designated CDBG funds for selective demolition of vacant or abandoned properties in the 2015 Action Plan so that properties can be returned to productive uses.*

*Louisville Metro agrees that energy efficiency is an important part of making housing affordable and continues to operate its weatherization assistance program for income-eligible households. CDBG funds are used to supplement Department of Energy funds, which make up the bulk of funding for this program.*

*Louisville Metro agrees that an increase in permanently affordable housing is desirable. Metro has identified affordable housing as the top priority need in the Consolidated Plan and has designated 44% of its CDBG funds for housing programs in the 2015 Action Plan budget. With the exception of allowable administration and TBRA costs, all HOME funds are used for construction and rehabilitation of affordable units.*

*Again, Louisville Metro thanks Ms. Hinko for her insightful comments and looks forward to continued partnership with MHC in addressing these issues.*

**Frank J. Schwartz, Executive Director, Project Warm**  
**Submitted via E-Mail on March 9, 2015**

Thank you for the opportunity to help the department plan for the next five year.

We strongly urge that the “Five Year Plan” incorporate “Energy Conservation” work and “Education”. A large number of Metro Louisville homes and apartments are older and have need for energy efficient improvements.

A combination of energy efficiency improvement with a robust education component can bring positive results. (see studies with benefits of health- based education and weatherization services)

Energy efficiency improvements can be part of the means to affordable housing. Investments in retrofit will bring benefit to the residences of these dwellings. In addition, scaling up energy retrofits would provide quality, skilled work for our Louisville residents. Investments in this sector would increase employment in the skilled building trades, again a positive for our local economy.

There is talk about giving the Affordable Housing Trust Fund meaningful support. I applaud that effort. Again, investing in energy retrofit work will give a boost to making housing affordability a better chance.

***Louisville Metro Government Response:*** *Louisville Metro agrees that these types of improvements are instrumental in making housing affordable for low/moderate income residents. Louisville Metro has identified improving owner-occupied units, including weatherization and energy efficiency improvements, as a goal in the Consolidated Plan with the expectation of leveraging additional Weatherization funds to increase the number of units receiving energy improvements.*

**Bill Bowman, Volunteer, Project Warm**  
**Submitted via E-Mail on March 9, 2015**

Thanks for the opportunity to add my two cents worth in support of Project Warm. I'm a long-time volunteer with the organization, helping to weatherize the homes of low-income elderly and disabled residents of Jefferson County. This organization does a tremendous job educating its clients about energy and comfort issues, and it does so at a very low cost (thanks to many volunteers).

In last November's Blitz, more than 300 homes were weatherized in preparation for the winter season. I'll bet those families are really happy now, after the kind of winter we've had!

As you consider the issues for the five-year plan, I hope you'll remember the great work that Project Warm is doing.

***Louisville Metro Government Response:*** *Louisville Metro applauds Project Warm for its energy efficiency work throughout the community and recognizes the importance of energy efficiency improvements in relation to affordable housing. Louisville Metro has identified improving owner-occupied units, including weatherization and energy efficiency improvements, as a goal in the*

*Consolidated Plan with the expectation of leveraging additional Weatherization funds to increase the number of units receiving energy improvements.*

## **Written Comments Received During the Public Comment Period April 13, 2015 through May 13, 2015**

**David Fannin, Director of Real Estate Finance and Acquisition, New Directions Housing Corporation  
Submitted via E-Mail on April 16, 2015**

As we indicated at the public meeting held on March 2, 2015, we are providing additional comments on the Five-Year Comprehensive Plan for use of HUD funds by Louisville Metro Government (LMG). There are many competing interests for what we understand to be diminishing federal resources. At New Directions, we are involved in all aspects of housing, including rental housing for persons of low and very low income, rehabilitation and new construction of single family housing for persons of low and moderate income (from 50% to 120% of AMI), owner-occupied rehab programs and our award-winning Repair Affair™ program that has marshaled the resources of thousands of volunteers over the past more than two decades to perform needed home repairs for homeowners with specific repair needs.

From this perspective, we believe that of the competing housing interests in LMG, the need to preserve owner-occupied residential properties is a compelling one. When funds have been available, we have provided oversight and leadership in providing residential rehab services to owner-occupied single-family residences. Many persons – especially elderly residents – would like to continue to live in their homes, but they often are on fixed incomes and cannot afford to make essential repairs to make this a reality. The alternative if they cannot keep up the residence is that they will have to rely on relatives, government-subsidized housing (but the waiting lists are long) or become homeless. In many ways, repair/rehab of existing owner-occupied housing is one of the most effective uses of housing dollars. We strongly encourage Louisville Metro Government to make a place for owner-occupied rehab in the Five-Year Plan.

Thank you for considering our additional comments.

***Louisville Metro Government Response:*** *Louisville Metro appreciates New Directions Housing Corporation's commitment to owner-occupied rehabilitation. Louisville Metro agrees that preservation of existing housing stock to preserve neighborhoods, provide help to low/moderate-income homeowners, and prevent vacancy and abandonment is a high priority. In the upcoming Program Year, Louisville Metro has proposed a drastic increase in funding for owner-occupied rehabilitation.*

**Natalie Harris, Executive Director, Coalition for the Homeless  
Submitted via E-Mail on April 27, 2015**

Once again, Metro Louisville is to be commended for creating a thorough and open process for the administration of federal CDBG, HOME, ESG and HOPWA funds and allowing citizens to comment on this process before and after the publication of the plan. The city must weight many different priorities and serve many different groups of citizens in making funding decisions. They also must work closely with the public, service providers and local leaders to coordinate and access leveraged funds. In this planning, they appear to achieve each of these goals.

Because we know that ending homelessness requires additional affordable rental housing and assistance, we are particularly excited to see that Metro Louisville's plan includes an increase in rapid re-housing and rental assistance targeted at very low-income persons. We are also happy that Metro Louisville has matched the priority need of housing affordability with the actions outlined in the plan. The solution to homelessness is affordable housing and the average Louisvillian must now earn over \$14 per hour to afford a two-bedroom apartment well above what many citizens earn.

While affordable housing is the solution, emergency shelter is still necessary with over 8,000 Louisvillians finding themselves homeless in our city each year. Therefore, we thank Metro Louisville for working to create programs that address long-term homeless solutions through the Continuum of Care and with national TA providers while still maintaining funding for safety net programs like White Flag, outreach and emergency shelter. Thank you also for your leadership in creating a common assessment initiating the Rx: Housing Veterans plan and assisting in getting technical assistance to Metro Louisville to insure the best use of all federal homeless funding.

The Coalition for the Homeless and our member agencies have worked closely with Metro Louisville for years to lower the number of persons who are homeless in our community. With even fewer resources than previous years, the Louisville Continuum of Care has greatly decreased chronic street homelessness and the numbers of veterans who are homeless. Additionally, the number of homeless persons counted in the one-day point-in-time count has decreased by approximately 100 each of the past five years.

After reviewing the 2015-16 Consolidated Plan for Metro Louisville, we have these additional suggestions or comments:

- 1) We feel that it is important to include in section MA-30 and SP-60, the newly established Bed One-Stop single point of entry to shelter. This coordinated homeless service entry allows anyone who is newly homeless to call 637-BEDS from 10-1:30 seven days a week to reserve a shelter bed. This new system has greatly improved shelter access, allowed us to be referred to the new common assessment, improved HMIS data quality and provided a system to refer when appropriate to homeless prevention prior to homelessness.
- 2) As the need for Case Management at the Emergency Shelter level has continually been emphasized by HUD, the Continuum of Care, and Louisville Metro, we recommend that a provision be added to the standards for Emergency Shelter indicating there should be case management staff available on site during the evening hours when emergency shelter guests are present. Additionally, we encourage Metro Louisville to work with the Continuum of Care to insure that adequate funding is committed to shelters to make this possible.
- 3) We are happy that Metro Louisville has returned to a competitive application process. We recommend that the ESG funding competition also include an opportunity for the panel or Metro staff to ask additional questions of the applicants, either in writing or in person to insure that all projects are scored appropriately.
- 4) Along with other barriers to affordable housing, we would add two more. First, the fair market rents in Kentucky are so low that it is difficult to create low-income rental housing to meet the

needs of people making extremely low incomes and still allow enough cash flow to maintain the project in future years. Second, there is not enough capacity or interest (perhaps due to the cash flow problem described above) to create and manage very low-income and supportive housing in Louisville. We encourage any support to developers, including CHDOs, that agree to develop and manage very low-income and supportive housing in our community.

- 5) We are happy to see that Metro Louisville has dedicated HOME funding to operate a TBRA program. We encourage the city to adopt a housing-first versus self-sufficiency approach for this program as this is the national evidenced-based model for permanent housing. We also request that you fully participate in the common assessment assuring that all referrals come through this community led process to insure those in greatest need are served first.
- 6) We encourage Metro Louisville to propose a permanent funding structure for the Affordable Housing Trust Fund from dollars not already dedicated to housing in the city. These funds could be used to supplement the HOME Program and leverage additional state funding to Metro Louisville.

Thank you again for this opportunity and the work that goes into creating a community-influenced Consolidated Plan for our community. We look forward to a continued and strong partnership with Metro Louisville.

***Louisville Metro Government Response:*** *Louisville Metro thanks Ms. Harris for her comments and applauds the Coalition's work toward ending homelessness in Louisville.*

*Louisville Metro agrees that including the Bed One-Stop Single Point of Entry system is important and has included this information in the final Consolidated Plan.*

*Louisville Metro evaluates subrecipient applications, including those for ESG funding, on an annual basis. The recommended allocations for Program Year 2015 include increased funding for shelter-based case managers. This need will be reevaluated annually.*

*The competitive application process for Program Year 2015 CDBG, ESG, and HOPWA funds included clarifying questions to applicants as requested by the review panel.*

*Louisville Metro appreciates Ms. Harris' recognition of the challenges to financing affordable housing development. The issue raised about Fair Market Rents emphasizes the importance of creating mixed-income developments, which have been successful at creating affordable housing while ensuring adequate cash flow to ensure long-term maintenance and affordability.*

*Metro's HOME TBRA program is currently undergoing changes to reduce barriers to entry and to move the program more in-line with other permanent housing programs. HOME TBRA has been participating in the Common Assessment Team referral process since May 2014 and new HOME TBRA referrals during that time have been through the coordinated assessment and referral system.*

*Louisville Metro is working to find and/or develop innovative financing mechanisms to address the great need for affordable housing in the community.*

**Donna Trabue, Volunteers of America - Kentucky**  
**Submitted via E-Mail on May 13, 2015**

I recommend that in the section of the action plan where it is noted that the Neighborhood Places and Association of Community Ministries work in the area of homelessness prevention, that Volunteers of America's Eviction Prevention Program should also be listed.

***Louisville Metro Government Response:*** *Louisville Metro thanks Ms. Trabue for her feedback and has included VOA's Eviction Prevention Program in the final Consolidated Plan.*