

HOME-ARP ALLOCATION PLAN

CITY OF CHATTANOOGA
TIM KELLY, MAYOR



DEPARTMENT OF ECONOMIC DEVELOPMENT
OFFICES OF HOUSING & COMMUNITY INVESTMENT AND HOMELESSNESS & SUPPORTIVE
HOUSING

INTRODUCTION

The American Rescue Plan Act (ARP) is a federal economic stimulus bill passed by the U.S. Congress and signed into law on March 11, 2021. The legislation provides \$5 billion for the U.S. Department of Housing and Urban Development (HUD) to the Home Investment Partnerships Program (HOME). This fund is intended to provide additional homelessness assistance and supportive services through the following activities:

- Development and support of affordable housing, as currently permitted under the HOME program;
- Tenant-based rental assistance
- Supportive services, including activities such as transitional housing, housing counseling, and homelessness prevention services; and/or
- Acquisition and development of non-congregate shelter units; which may be converted into permanent affordable housing, used as emergency shelter, or remain as non-congregate shelter units

On April 8, 2021 HUD announced the HOME-ARP allocations for participating jurisdictions. The City of Chattanooga was awarded \$2,966,210 as a non-entitlement allocation.

CONSULTATION

Summary of the consultation process

The City consulted with community partners in the public and private sectors to develop this HOME-ARP Allocation Plan. These stakeholders have knowledge and expertise to speak to the needs, service gaps, and potential activities that would best benefit qualified populations to be served by these funds. Stakeholders consulted included those working with families or individuals experiencing or at-risk of homelessness, fleeing domestic violence, and other vulnerable qualifying populations. In the development of the HOME-ARP allocation plan, the City of Chattanooga consulted with stakeholders and asked for their input concerning the eligible activities and the proposed budget. Stakeholders articulated the gaps in services and/housing needs by providing verbal input and responding to a digital survey ranking which eligible activities the City should prioritize. The City synthesized the consultants' feedback, and the following tables summarize the feedback received. The City will continue to meet with stakeholders throughout the implementation of the HOME-ARP activities in an effort to assess the ongoing needs of stakeholders' clients. The City will also strive to collaborate with stakeholders to develop strategies that will further the goal of ending chronic homelessness.

Table 1: Agencies/Organizations Consulted

Agency / Organization	Type of Organization	Method of Consultation	Feedback
Volunteer Behavioral Health	Mental health service provider & PSH provider	in-person meeting to discuss how the City should prioritize the use of the HOME-ARP funding	<p>Volunteer Behavioral Health Care System is a mental health provider in the middle, Southeast, and upper Cumberland regions of Tennessee. Volunteer provides several services, including mental health and addiction counseling. Volunteer identified the need for additional funding for support services. The need was also identified to fill the gap in funding for supportive housing staff with state funding only providing 20% FTE for supportive housing staff.</p> <p>In addition, there is a need in the community for additional rental subsidies. Regionally it has become more</p>

			<p>difficult for service providers to secure housing for clients utilizing vouchers.</p> <p>Volunteer expressed an interest in increasing the number of beds in their PSH program.</p>
Partnership	Service provider for survivors of domestic violence. Also serves homeless youth with obtaining housing and services.	In-person meeting to discuss how the City should prioritize the use of the HOME-ARP funding	<p>Stated funding was needed for subsidies for housing</p> <p>Lack of affordable housing was growing</p> <p>Needed more prevention services, virtually none in Hamilton county</p> <p>Org. focused on prevention and RRH</p> <p>Need for more specialized housing like for DV survivors</p>
La Paz	Latinx community services	Survey; in-person meeting to discuss how the City should prioritize the use of the HOME-ARP funding; and, how the OHS could better serve the Latinx community.	La Paz provides rapid re-housing and supportive services to HOME-ARP qualifying populations, specifically those who are homeless in the Latinx community. Priorities for service identified by La Paz included low barrier noncongregate family shelter and low income housing in neighborhoods desirable to the Latinx population.
AIM Center	PSH for those with mental health diagnoses	Survey; in-person meeting to discuss how the City should prioritize the use of the HOME-ARP funding	OHS consulted with the AIM Center to determine priorities for addressing needs of persons experiencing homelessness with mental health diagnoses. The feedback received supported funds to be used for low barrier non-congregate shelter and additional permanent supportive housing units.
Veterans Affairs	Veteran Services	Survey; in-person meeting Survey; in-person meeting to discuss how the City should prioritize the	Veteran Affairs would like to see more affordable permanent housing. We discussed PSH units and supportive services that come along with PSH. They also want to be a part of the sanctioned

		use of the HOME-ARP funding; and, to discuss the VA's role in serving homeless veterans	encampment to be able to speak and meet with their clients. VA also wants to be a part of the movement to help and be good community partners.
Chattanooga Regional Homeless Coalition	Continuum of Care lead organization	Survey; in-person meeting Survey; in-person meeting to discuss how the City should prioritize the use of the HOME-ARP funding; and, additional consultation as to how the City can align with the regional homeless services strategies as envisioned by the CRHC.	CRHC was consulted regarding the "Needs Assessment and Gap Analysis" section of this Plan. The Coalition also manages the HMIS system and subrecipients report accomplishments related to homelessness. Data from HMIS is used to evaluate program performance. The Coalition is the lead agency for the SE Tennessee Continuum of Care (TN-500; CoC). In addition, the CoC was consulted about potential HOME-ARP activities, fund distribution, and collaborations. The Coalition supported the need for the funds to address supportive services and the need to provide low income housing options.

Table 2: Survey Respondents

Activities	Priority 1	Priority 2
Development and support of affordable housing, as currently permitted under the HOME program.	6	5
Acquisition and development of non-congregate shelter units; which may be converted into permanent affordable housing, used as emergency shelter, or remain as non-congregate shelter units	8	2
Combination of supportive housing & sheltered housing	1	0
Supportive services,	1	8

including activities such as transitional housing, housing counseling, and homelessness prevention services		
Tenant-based rental assistance	0	1

PUBLIC PARTICIPATION

Describe the public participation process, including information about and the dates of the public comment period and public hearing(s) held during the development of the plan:

Public participation is a vital element in assessing the needs of and gathering input from Chattanooga. The City worked to meet the requirements by hosting two public hearings. In addition, in an exercise to maximize input and exceed regulatory expectations a survey of needs was shared with Chattanooga to support the preparation for the HOME-ARP Allocation plan.

The City held a public hearing that discussed the development of the HOME-ARP Allocation Plan, which incorporated information and discussion of community needs and eligible activities related to HOME-ARP, along with the chance to provide public comment on the proposed budget and activities.

A virtual hearing was held on **Thursday, January 6, 2022**. And a hybrid in-person and virtual hearing was held on Monday, **January 24, 2022**. During the public hearings, the City presented information on the HOME-ARP allocation and eligible HOME-ARP activities, as well as introduced the City's priority areas for use of funds for public input.

The public notice for the HOME-ARP Allocation Plan was published in the **Chattanooga Times Free Press** on **December 22, 2021** in English. The public comment period on the Draft HOME-ARP Allocation Plan coincided with the public hearings, beginning **January 27, 2022** and ending on **February 10, 2022**.

Describe any efforts to broaden public participation:

- Flyers for the public hearing posted in City Hall and in community centers
- Easy access to reviewing proposed Allocation Plan

Summarize the comments and recommendations received through the public participation period:

A community partner survey was conducted at the start of the HOME-ARP planning process. Community partners from 15 organizations were invited to participate in the survey, which was conducted from November 22, 2021 - December 2, 2021. A total of 17 responses were received.

The number one priority area identified by Community Partners in the Survey is: Acquisition and development of non-congregate shelter units; which may be converted into permanent affordable housing, used as emergency shelter, or remain as non-congregate shelter units.

A summary of all public comments received in the virtual and in-person meetings are included in *Appendix A and Appendix B* of this report, respectively.

One public response was received during the comment period from February 1st to 15th, 2022. The email is included in *Appendix C*.

Summarize any comments or recommendations not accepted and state the reasons why:

The City received all comments and acknowledges the community's requests for the need for additional shelter beds. This need is supported by the gaps analysis in this Plan. However, it is not feasible at this time for the City to undertake the acquisition and operation of a shelter. It is possible for the City to support community partners in providing additional supportive services in a shelter setting, such as housing counseling, utilizing this allocation of HOME-ARP funding.

NEEDSASSESSMENT AND GAPSANALYSIS

To assess the unmet needs of HOME-ARP qualifying populations, evaluation of the size and demographic composition of those populations is included. The City has also identified gaps within its current shelter and housing inventory, as well as the service delivery system. In the needs assessment and gaps analysis, the City used current data, including Comprehensive Housing Affordability Data (CHAS), 2020 Point in Time Count (PIT Count), 2020 CoC Housing Inventory Count (HIC), or other data available data sources.

The following information includes the basis for the needs assessment and gap analysis for HOME-ARP qualified populations.

Table 3: Homeless Needs Inventory and Gap Analysis Table

Homeless													
	Current Inventory					Homeless Population				Gap Analysis			
	Family		Adults Only		Vets	Famil y HH (at least 1 child)	Adul t HH (w/o child)	Vets	Victim s of DV	Family		Adults Only	
	# of Beds	# of Unit s	# of Beds	# of Unit s	# of Beds					# of Beds	# of Unit s	# of Beds	# of Unit s
Emergency Shelter	101	36	123		0	33	210	14					
Transitional Housing	8	2	0		8	2	8	8					
Permanent Supportive Housing	302	126	164		56	248	274	50					
Other Permanent Housing	126	34	37		26								
Sheltered Homeless						35	218	22					
Unsheltered Homeless						28	180	10					
Current Gap		113	348										

Suggested Data Sources: 1. Point in Time Count (PIT); 2. Continuum of Care Housing Inventory Count (HIC); 3. Consultation 4. CHS [Draft Gaps Analysis May 21-3.pptx](#)

Table 4: Housing Needs Inventory and Gap Analysis Table

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households

Total Rental Units	75,749	
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	6,175	21,764
Rental Units Affordable to HH at 50% AMI (Other Populations)	16,406	15,343
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)	17,027	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)	10,346	
<i>Current Gaps</i>		

Data Sources: 1. American Community Survey (ACS); 2. Comprehensive Housing Affordability Strategy (CHAS)

Describe the size and demographics composition of qualifying populations within Chattanooga's boundaries:

HUD requires HOME-ARP funds be used to primarily benefit individuals and families in specified HOME-ARP “qualifying populations.” Qualifying populations include, but are not limited to, the following

- Sheltered and unsheltered homeless populations
- Those currently housed populations at risk of homelessness
- Those fleeing or attempting to flee domestic violence or human trafficking
- Other families requiring services or housing assistance or to prevent homelessness
- Those at greatest risk of housing instability or in unstable housing situations

In accordance with HUD’s definition of homeless under the HOME-ARP grant, City of Chattanooga will consider a homeless family or individual to generally include:

- An individual or family who lacks a permanent and adequate permanent home
- A person or family who will imminently lose their permanent home due to a lack of resources or support
- A youth under the age of 25, even if accompanied by an adult, that does not have a permanent home

The Chattanooga Regional Homeless Coalition (CRHC) serves as the lead agency of the Chattanooga/ Southeast Tennessee (TN-500) Continuum of Care (CoC). The CoC promotes the

region-wide commitment to the goal of ending homelessness by advocating for people who are homeless, strategically planning for housing and services in the region, and collaborating with community partners.

The CRHC conducts the annual Point-in-Time Homeless Count & Survey (PIT Count). The annual PIT Count is mandated by HUD for communities across the country. During the last 10 days of January, thousands of our volunteers canvass communities, to count and survey individuals and families experiencing homelessness. The PIT count helps to ensure the voices of people experiencing homelessness in our community are heard and that efforts are made to provide appropriate services. It also helps us develop more effective plans and measure progress towards our goal of ending homelessness.

The CRHC 2021 PIT Count found a total of 1,482 individuals experiencing homelessness over the 10 days the Count in the CoC's 11 county region conducted in January 2021. In the homeless population, 88% of persons experiencing homelessness were over the age of 24. There were 105 children under the age of 18 were counted, of those counted only 1 in 4 of the children under age 18 were residing in a shelter.

The majority of the homeless population is older (over the age of 24) and unsheltered. With 88% of the population being adults over the age of 24 and 83% (1,090 individuals) of that group not residing in shelter. Overall, three out of five persons in the population experiencing homeless were male with a higher percentage in the unsheltered population (84%). A total of 69 young adults (18-24) were among those experiencing homelessness. One child was found in parenting youth households, and they were in emergency shelter or transitional housing. The vast majority of those experiencing homelessness were white (85%) or Black (14%). Only 1% of those experiencing homelessness who were interviewed considered themselves Hispanic. The findings show a higher percentage of white homeless people were found in the unsheltered population than in the sheltered population. These numbers reflect the findings of the entire Southeast Tennessee Continuum of Care, a rural CoC consisting of a majority white population. Regional demographics, as well as racial and ethnic disparities must be considered when reviewing these figures.

Chattanooga, while working to end homelessness for everyone, must ensure system policies, programmatic practices, and unconscious bias are not preventing or delaying people of color from accessing services, or directing them to services not of their choosing. As the homeless response system transforms, all people, especially people of color, must have equitable access and opportunity.

Individuals and Families at Risk of Homelessness

HUD defines those at risk of homelessness as individuals and families who have an income below 30% of the area median income (AMI), do not have sufficient resources or support networks to prevent them from becoming homeless, or live with instability, like moving two or more times during the last 60 days due to economic reasons. Using HUD's 2014-2018 CHAS data, Chattanooga has 9,865 households with incomes at or below 30% AMI, which is 14% of all Chattanooga's households. Of households with incomes at or below 30% AMI, 79% are renter households.

Individuals and Families Fleeing Domestic Violence

Those fleeing or attempting to flee domestic violence or human trafficking qualifies for HOME-ARP funding. This population includes any individual or family who is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking. It includes cases where an individual or family reasonably believes that there is a threat of imminent harm from further violence due to dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return or remain within the same dwelling unit.

After a less than 2% decrease in reports of domestic violence in 2019, Chattanooga has experienced an alarming rise in domestic violence reports since 2020. As a result of the COVID-19 pandemic reports of domestic violence between partners jumped by 24% from the previous year in March of 2020, within the first month of stay at home orders, according to the Tennessee Bureau of Investigation (TBI) annual report. Overall, reports of domestic violence cases increased by 2.6% across Tennessee from 2019 to 2020.

The majority of family violence fatalities are women. In 2020, TBI found that 54 women were killed and 36 men were killed by their partner. The highest risk age group for experiencing domestic violence is identified as those between the ages of 25-34. Victims ranged in age from below 18 (6,755 victims) to 65+ years old (2,351).

Residents Living in Unstable Housing Situations

HOME-ARP qualifying populations also include other populations who have previously qualified as homeless, are currently housed with temporary or emergency assistance, and who need additional housing assistance or supportive services to avoid a return to homelessness. In addition, HUD defines those at greatest risk of housing instability as households that have an annual income less than 30% AMI and are experiencing severe cost burden or have an income less than 50% AMI and meet a certain condition, like living in someone else's home or living in a hotel due to an economic hardship.

In CHASdata, HUD defines housing problems as a household that has one or more of the following: lacking a kitchen or plumbing, having more than one person per room, or being housing cost burdened at 30% or more. Of these problems, housing costs negatively impact most renters whose household income is at or below 50% AMI. About three in four (70.1%) renters earning at or below 50% AMI are either cost burdened or severely cost burdened.

Identify and consider the current resources available to assist qualifying populations, including congregate and non-congregate shelter units, supportive services, TBRA, and affordable and permanent supportive rental housing:

Overview of Congregate and non-congregate shelter

The City of Chattanooga has 73 year-round shelter beds for a homeless population of 648 people on any given night. None of the shelters in Chattanooga qualify as low-barrier shelters. This leads to hundreds of people in Chattanooga sleeping outside on public and private property each night. With an average time from homelessness to housing of 60 days prior to COVID-19, ballooning to

190 days over the past two years of the pandemic. There will always be a period of time for people experiencing homelessness will need a place to sleep, keep their belongings safe, take a shower, and spend their day without the threat of harassment for trespassing, loitering, or obstructing the sidewalk.

Non-congregate shelter availability

Over the last two years, the **City of Chattanooga** utilized ESG-CV funds to provide hotel rooms as non-congregate shelter to those who were literally homeless and at high risk for contracting COVID. As of January 3, 2022, funds were exhausted and there are no longer non-congregate shelter options available specifically for those at high risk for COVID.

The Chattanooga Community Kitchen is the site of the **Madellan Shelter for Families** that offers short-term emergency shelter to as many as 13 families with children at a time.

The **Chattanooga Room in the Inn (CRITI)** is a hybrid of shelter and transitional program serving women and children experiencing homelessness. Participants who aren't interested in the transitional program receive shelter for up to 45 days. The rest can roll into the transitional program which can shelter them for as long as it takes to reach permanent housing. Each transitional client receives an Individualized Service Plan to achieve goals in Education, Employment, Finances, Health and Housing

Congregate shelter availability

The primary congregate shelter provider is the **Chattanooga Rescue Mission**, the only year round congregate shelter offering 73 beds.

Overview of Supportive Services, Outreach, & Permanent Support Rental Housing

Office of Homelessness & Supportive Housing (OHSH) provides a rapid re-housing program with housing navigation, service coordination, and housing stabilization services. OHSH also employs four (4) outreach workers to engage with the unsheltered community to meet emergency needs.

Volunteer behavioral healthcare systems provide outreach services to the unsheltered population; mental and physical health services; addiction counseling; and supportive housing.

The Chattanooga Community Kitchen provides meals three times a day, 365 days a year. As well as supportive housing, case management services, and access to showers and laundry facilities.

The **AIM Center Housing** manages 74 affordable housing units for low-income individuals successfully managing their mental illness. AIM Center Housing also provides support services which assist tenants' development of independent living skills. Residents focus on recovery and growth through decision-making that supports successful management of their mental illness.

Identify any gaps within the current shelter and housing inventory as well as the service delivery system:

The gaps identified through this HOME-ARP Allocation plan process remain consistent with what was identified through Homeless System Gaps Analysis conducted by CSH in May of 2021. There is an overall need for increased shelter capacity, affordable and permanent supportive rental housing, as well as for the continued expansion of case management and supportive services. The amount of time it takes to transition from engagement with a service provider for housing to obtaining permanent housing continues to increase as rental housing wait lists grow in the public and private sectors. Additionally, increased rents in the private sector make it difficult for housing voucher utilization.

Identify the characteristics of housing associated with instability and an increased risk of homelessness if the PJ will include such conditions in its definition of "other populations" as established in the HOME-ARP Notice:

The City of Chattanooga will not include these conditions in its definition of other populations.

Identify priority needs for qualifying populations:

Ideally, a system exists that is nimble and responsive enough to stop homelessness before an at-risk household becomes homeless. We recognize the need for additional resources for diversion with limited current efforts. Ultimately, the qualifying populations require affordable housing with appropriate, effective support services delivered at the right time.

In Chattanooga, we have deployed rental assistance and funds for security deposits, landlord incentives, and utility assistance. The key missing links now for most qualifying populations are (i) available permanent housing opportunities for very low- and extremely low-income families and individuals (ii) direct services to sustain in housing. Specifically, there is a critical need for additional housing units that accept rental assistance vouchers or are priced affordably for very and extremely low-income households, as well as the services to accompany them. The pandemic has strained an already tight housing market and agencies lack diverse funding streams to operate at needed capacity.

Explain how the level of need and gaps in its shelter and housing inventory and service delivery systems based on the data presented in the plan were determined:

The gaps in services and programs needed to provide shelter, housing, and services were determined using data from multiple sources. The level of need for unsheltered and shelter households experiencing homelessness was determined by evaluating the number of unsheltered households and the level of resources available to adequately house the families or individuals with permanent supportive housing and critical long-term supportive services to achieve housing stability.

For households that are currently housed but have challenges maintaining their home, the level of need was measured by the amount of inventory that had affordable, safe, and adequate living conditions and the number of renter households that are experiencing severe housing cost burdens. These households need assistance that helps them stay housed without incumbering them with the cost of their home.

HOME-ARP ACTIVITIES

Describe the method for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors and whether the PJ will administer eligible activities directly:

The City anticipates managing some activities in house and will partner with community partners on others. In instances where the City determines that it needs to partner with outside entities on particular activities, it do so through a request for proposals process. There will be a specified period of time to submit applications to make it a more competitive process in awarding these funds. During that time any organization, developer, or subrecipient is eligible to apply. At the close of the application period, all applications received will be reviewed for completeness, eligibility, and their ability to deliver on the priority needs identified within this plan. Each applicant will also be reviewed for their ability to carry out the project meeting all eligibility criteria.

Award(s) will be made based on the applicant's project scope as it pertains to the outlined priority needs in this plan as well as the applicant's familiarity with utilizing federal funding and ability to comply with all federal and local requirements.

If any portion of the PJ's HOME-ARP administrative funds were provided to a subrecipient or contractor prior to HUD's acceptance of the HOME-ARP allocation plan because the subrecipient or contractor is responsible for the administration of the PJ's entire HOME-ARP grant, identify the subrecipient or contractor and describe its role and responsibilities in administering all of the PJ's HOME-ARP program:

The City will not allocate funds to a subrecipient or contractor to administer the entire HOME-ARP grant.

Table 5 Use of HOME-ARP Funding

Supportive Services	\$ 840,426*		
Acquisition and Development of Non-Congregate Shelters	\$ 0		
Tenant Based Rental Assistance (TBRA)	\$ 840,426*		
Development of Affordable Rental Housing	\$ 840,427*		
Non-Profit Operating	\$ 0	0%	5%
Non-Profit Capacity Building	\$ 0	0%	5%
Administration and Planning	\$ 444,931	15 %	15%
Total HOME ARP Allocation	\$ 2,966,210		

Funding within these categories may be amended to accommodate adjustments to best serve eligible clients through proposed services or activities.

Describe how the characteristics of the shelter and housing inventory, service delivery system, and the needs identified in the gap analysis provided a rationale for the plan to fund eligible activities:

The gaps in services and programs needed to provide shelter, housing, and services were determined using data from community assessments by consultants and HUD reports. The level of need for unsheltered and shelter households experiencing homelessness was determined by evaluating the number of unsheltered households and the level of resources available to adequately house the families or individuals with permanent supportive housing and critical long-term supportive services to achieve housing stability. For households that are currently housed but have challenges maintaining their home, the level of need was measured by the amount of inventory that had affordable, safe, and adequate living conditions and the number of renter households that are experiencing severe housing cost burdens. These households need assistance that helps them stay housed without encumbering them with the cost of their home.

HOME-ARP PRODUCTION HOUSING GOALS

Estimate the number of affordable rental housing units for qualifying populations that the PJ will produce or support with its HOME-ARP allocation:

The City estimates that it will produce or support 15-60 units using HOME-ARP funds. The City also estimates that additional HOME funding from its annual entitlement allocation will be utilized in these projects.

PREFERENCES

Chronic homelessness assistance

Identify whether the PJ intends to give preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project:

The City will not prioritize but will be assisting all qualifying subpopulations.

Appendix A

HOME-ARP Public Virtual Meeting Notes

January 6, 2022

Staff: Sandra Gober, Cassie O'Neill, Sam Wolfe, Lindsey Garland

Cassie introduces herself and explains why we're here. The American Rescue Plan (ARP) is a federal economic stimulus bill passed by the US Congress and signed into law March 2021. It provides \$5 billion for the US Department of Housing and Urban development (HUD) for the Home Investment Partnerships Program (HOME). This fund is intended to provide additional homelessness assistance and supportive services. The City of Chattanooga was awarded \$2,966,210 of the HOME-ARP as a non-entitlement allocation. This is an increase outside of our usual allocation of HOME funding.

Allowable Activities-

Involves services and activities for transitional housing, housing counseling and homelessness prevention services. Homeless persons are defined by HUD's official definition "literally unsheltered or living in a place not fit for human habitation, imminent risk of homelessness, those fleeing domestic violence of human trafficking.

Development and support of affordable housing, as currently permitted under the HOME program.

Tenant-based rental assistance- provide housing navigation for unsheltered clients and provide rental assistance (deposits, bills or anything to help keep them housed).

Acquisition and development of non- congregate shelter units: which may be converted into permanent affordable housing used as emergency shelter or remain as non-congregate shelter units.

The city of Chattanooga is prioritized and is interested in pursuing the development of low income and supportive housing.

Cassie finished presentation and opens it up for questions.

Sandra Gober, Cassie O'Neil, and Sam Wolfe are primarily answering these questions. Q= question, A= answer, C= comment from attendee. Please note these are not direct quotations word for word, some comments/questions are not as clear as others- if further clarification is needed please refer to the recording of the zoom meeting.

Q: Can you define affordable housing?

A: 0 up to 60% AMI

Q: Did any other surrounding cities or communities get allocated funding?'

A: Cities that typically receive HOME as an entitlement also received additional ARP funding. Knoxville, Nashville, and Memphis for example

Q: What do the experts (those that work closely with homelessness) think should be a priority with this money? Not every plan will work for every homeless person, as they are all very different

A:

Q: will this funding be going towards section 8?

A: Tenant based rental assistance can only be used with one source of federal money, it would be like double-dipping into the funds if already subsidized housing were to take the new ARP funding.

Sam adds that the city has access to city general funds, and it doesn't meet the same federal requirements – able to assist with move in costs like first month's rent, application fees, deposits, etc. when folks are moving into section 8. They must be literally homeless to use that money with the ARP.

Q: Is there potential to have the non-congregate (NC) shelters as opposed to the sanctioned encampment

A: One would not get to replace the other. The NC would be a new project and the encampment is in process currently, so it would be an additional project

Q: are you proposing the NC shelter, is that in the proposal?

A: There isn't a proposal specifically for the NC shelter, the purpose of this meeting is to get feedback. If the majority feedback is in support of using the ARP funds for that, the city will have to include and justification to HUD as to why we would prioritize funding for NC shelters over another.

Q: Can the NC be converted into permanent housing in the future?

A: Yes. Sam- We are actively exploring options for a low barrier shelter (acquisition and rehabilitation of a structure) however, the city needs to find a strong community partner willing to operate and manage the shelter. It is an ongoing discussion with people on. Circling back to the purpose of this meeting, is to really hear from the public as to what they think will make the biggest impact with this \$2.9 million within the allowable activities (shelter, housing, supportive services)

Q: What is the definition of supportive services? Is that getting someone into a unit and then having a case worker helping them.

A: Yes.

The person who asked the previous question would like to see more of those services provide in Chattanooga.

Q: Since we have been talking about tent homes, what about something more permanent like shed homes or 3D printed homes

A: Yes, it sounds like that would be considered a non-congregate shelter but as a tiny home model. The shed homes are not very permanent solutions. Sam mentions that the city is very interested in ideas that would significantly lower the cost of housing. However, there are many restrictions and requirements on the type of units (square footage of the units or location) from the federal level if using this funding. As stated before, the city is looking at partnering with organizations to explore this kind of option if we cannot use federal money.

Now, the discussion turns to the chat box to address questions coming from there.

Q: “What about building a true transitional housing shelter? Buying another motel..

True Transitional shelters where supportive services are in place at the shelters. Participants are allowed to stay there for two years.”

A: transitional housing would be a supported activity for this funding. Expanding options and more variety of transitional housing is a big priority based on the discussion in the chat. Mike links a website with what services are allowable with HOME-ARP

C: For me, I think one of two or ideally both (knowing that money is limited to an extent), one would be a NC shelter that is specifically low barrier and affordable housing. Its important that it would help address those that have extremely low income or zero income.

Q: Asks Sandra, would it be possible to access funding from the federal home loan bank (FHLBank), if they could match our available HOME so we can double the amount to invest in property?

Sandra: To access the additional funding from the FHLBank, you would need to have a defined project and submit an application outlining the finances. So, if you wanted to use the money to construct rental housing and you’re looking for other funding/resources to supplement that you would have to go through their application process. It would look like any other development, but would have to be highly subsidized based on the population you would be serving (zero to very low income, 0-60% AMI).

C: “Is the city interested in using these funds to fund programs providing support services now thru esg cv2 funds? Since those are going to expire 9/30/22”

A: Sam- Yes, supportive services are an allowable expense

C: “what will the supportive services look like once they are housed? how long to provide the service beyond being housed?”

A: It depends on the program model. Most of the supportive services are used for as long as the individual needs it. Sometimes a person will need those services for their whole lifetime. If they get into stable/supportive housing, those needs may be lessened over time if they are able to live independently. For rapid rehousing, this approach is time limited because the person may have less supportive services to be successful in a stable housing environment. Programs average 1-2 years for rapid rehousing. Sam mentions that he would like to hear if people think we need more permanent supportive housing vs. rapid rehousing. (Obviously we need both, but which could help

more long term). In today's environment, there is a very limited supply of affordable units, construction costs are high and it is increasingly difficult to find available contractors.

Q: as you speak of finding units because of construction costs. Because section 8 landlords are dependent on the zip code determining how much the housing authority will pay, some areas it can make more of a financial strain on landlord, resulting in fewer units in certain areas available to section 8 renters. Is there such thing as universal section 8 allocation for units based on bedrooms

A: Sandra- the housing authority adjusts their portion of the rent based on the zip code. When we use our funding and partner with non-profit/for-profit organizations to construct rental housing, there is a schedule (HUD published this information every year) based on the # of bedrooms that we have to adhere to with limits (rent limits landlords can charge).

C: I would like to see the funds go to NC shelters; we don't have a low barrier shelter, or ones that allow teenage sons, or enough family shelters. Because we're in the winter season, there are so many homeless families and individuals out on the street in freezing temperatures.

A: Wendy Winters- to follow up on that, Sam or Sandra, do you have any knowledge of some properties available? Just wondering how quickly they could be used for NC shelters. Sam mentions that there aren't any properties we could go ahead and use. Location (good access to services, transportation) and having a partner operate the shelter are a big barrier in getting that set up. Sandra mentions long term sustainability of the property for a NC shelter as a challenge. Cassie would like to not focus on the barriers for the purpose of community input and hear where people would like to see the money go. She doesn't want to discourage anyone's ideas and that they (the city, homeless services) would figure out the barriers.

C: reiterate what other people have said, this is an opportunity to diversify our approach. Low barrier NC housing is the top priority.

Q: Is it possible for the city to run the shelter? Does it have to be contracted?

A: Sam- It is something we will have to explore due to ongoing costs and our capacity to manage a sustainable, long-term shelter. Since we've been talking about the cold weather shelter, the community kitchen does operate a cold weather shelter (mats on the ground) but it is an option for some people. Salvation army also has overflow.

Erin (CRITI)- Chattanooga room in the inn does accept families with teenage sons.

Q: What about 3D Printer housing. They are quick to construct.

A: That option has not been heavily explored yet with the city, but other organizations have looked into it and are interested in constructing them.

Q: Wendy- Do these shelters have to be built in the city limits?

A: Yes

Me to Waiting Room Participants 05:24 PM

Meeting will start at 5:30!

From Mike Smith he/him TN-500 to Everyone 05:36 PM

Category 4

From Shelby Glover to Everyone 05:40 PM

Permanent Supportive Housing units

From gayle.lodato's iPhone to Everyone 05:41 PM

Is the city interested in using these funds to fund programs providing support services now thru esg cv2 funds? Since those are going to expire 9/30/22

From Mike Smith he/him TN-500 to Everyone 05:42 PM

Gayle, THDA is setting the last day of ESG-CV2 as 6/30/22 now.

From Yashika Ward to Everyone 05:44 PM

What about building a true transitional housing shelter? Buying another motel..

From Nirva Aché to Everyone 05:48 PM

what will the supportive services look like once they are housed? how long to provide the service beyond being housed

From Yashika Ward to Everyone 05:48 PM

True Transitional shelters where supportive services are in place at the shelters. Participants are allowed to stay there for two years.

From Connecting Vets to Resources to Everyone 05:49 PM

I too favor purchasing a hotel or homes

From Mike Smith he/him TN-500 to Everyone 05:49 PM

@Steve this link details what support services allowable under HOME:

<https://www.ecfr.gov/current/title-24/subtitle-B/chapter-V/subchapter-C/part-578#578.53>

From Stephen Brookes to Everyone 05:50 PM

Thank you Mike

From Yashika Ward to Everyone 05:50 PM

Yes

From Sam Wolfe - City of Chattanooga to Everyone 05:50 PM

@yahsika - gotcha!

From Tamarah Taylor to Everyone 05:52 PM

With the affordable housing options, are we taking into consideration those who fall under the 5 year CHA ban or falling under imminent risk or with a background that disqualifies them from housing. Are there planned accommodations for those populations?

From Patrick Cate to Everyone 05:52 PM

Tamarah

From Patrick Cate to Everyone 05:52 PM

That's a great point

From Nirva Aché to Everyone 05:56 PM

more rapid rehousing is needed but both

From Shelby Glover to Everyone 05:57 PM

more permanent supportive housing. Statistically it producing longer more stable results in communities.

From Patrick Cate to Everyone 05:58 PM

I can't make an audio comment so I'll type it here., but I just wanted to say it shouldn't be lost on anyone that the temperatures tonight will be 18 degrees, and I currently have unhoused clients who have to make the decision between safety and shelter tonight. Chattanooga is behind locally (at the state level) for non congregant shelter, so while we need to increase low income housing in the long term, this is an urgent need.

From micahjohnadkins to Everyone 05:58 PM

Agreed Patrick

From Nirva Aché to Everyone 05:59 PM

agree with Patrick

From Mike Smith he/him TN-500 to Everyone 05:59 PM

I have to hop in a YHDP planning meeting. Y'all have a great evening and my opinion is that we need a non congregate shelter with plans to convert into PSH

From r. harkins to Everyone 06:02 PM

I agree 100% Patrick

From Erin Creal, Chattanooga Room in the Inn to Everyone 06:02 PM

Kacy, we accept families with teenage sons.

From Gertha Lee to Everyone 06:08 PM

What about 3D Printer housing. They are quick to construct.

3D- Printed Hud Homes

From Ryan Lloyd to Everyone 06:12 PM

Agreed

From Connecting Vets to Resources to Everyone 06:13 PM

If a permanent shelter materializes how many will be housed?

From Erin Creal, Chattanooga Room in the Inn to Everyone 06:14 PM

for participating y'all!

Corey: things we aren't doing (non cog. Housing), no barrier housing option

Sarina and Kacey: more permanent shelters (not just cold weather shelter) they can leave stuff there, receive mail and phone calls with case managers. A lot of the population struggles to get to the shelter because there are different camps around the city. Many homeless persons have their homes outside and cannot leave all of their belongings. The community kitchen has a lot of resources, but it is not a maintainable solution for a lot of the homeless population. Additional resources can only be a good thing. Rapid re housing works better with permanent shelters in place.

Cassie discusses the next steps and the calendar:

Because of the weather, there will be another public meeting in person January 24th.

Present draft allocation plan to Council in Committee January 25th

Draft plan available for review – 15 day comment period starts January 27th

Comment period ends February 10th, the council approves the plan on February 15th, and then the plan will be submitted to HUD February 17th.

Appendix B

January 24th 5:30 pm

DRC Conference Room 1A and Zoom

Staff: Sandra Gober, Sam Wolfe, Jermain Freeman, Cassie O'Neill, and Lindsey Garland

Presentation and then Q&A

Q: What are the city's priorities for this funding?

A: Development and support of affordable housing, additional supportive services, and tenant based rental assistance.

We are provided the allocation through the American Rescue Plan and are required to get input from our community stakeholders which are: Homeless Coalition, Housing Authority, and other partners who provide specific services to the homeless population. Then we also have to include community input along with the budget to submit our plan.

Q: Asking how to anticipate what will be the more successful and how much supportive housing will be provided

HUD requires long term strategic planning and measures to make sure we are delivering the things that we promised.

Sam: applications close in February, people are still submitting proposals, it is difficult to summarize what method would be best to use for affordable housing. the money can change

Currently we don't have an estimate, it depends on the route, and we are doing an assessment right now of which method of developing housing (new construction or rehab) is going to result in the most units.

Q: Will the city buy any property?

Older city buildings are not suitable for affordable housing due to back taxes or environmental issues.

The city can buy and turn into housing, working on being strategic with resources

Q Janice Gooden: we talked about low barrier shelters but transitioning into other forms of housing

Cassie: We are required to talk to our community partners for the HOME-ARP and some of the community partners are very interested in adding to their supportive housing. If its not done through this HOME-ARP allocation, that they submit applications to the city's other American Rescue Plan funding. We want to make sure we aren't duplicating our efforts with this money and that if it could be used for something else that is needed. Basically, utilizing all possible resources for our overall goal.

Gertha provided some information about 3D printed housing in the last public input meeting (January 6th) and Sam Wolfe has set up a meeting to discuss the possibility. He has connected with Branch Technology about 3D printed houses for our homeless population.

Q: Can funding be used alongside LIHTC or other funding sources?

We cannot duplicate services and match funding with another federal funding source. HUD requires that we stay in the 0-30% AMI housing

Using LIHTC to additionally subsidize housing developments...there is a huge need for 0% AMI housing because it is extremely difficult to get homeless people with no income housed. The Homeless services office uses a housing first practice to find housing, then get them the necessary services to stay housed.

Q: Supportive services- do you have other service providers (mental health), are there going to be multiple types of support services available to use with this funding?

Yes, there are multiple service models we use. The Kelly administration wants to prioritize developing more permanent supportive housing. That includes helping those that have substance abuse or serious mental health issues that need more long-term care.

Q: are you looking at projects helping diverse group of people to address youth, elderly, veterans, vulnerable populations.

Yes, we are required by HUD to include plans for specific vulnerable populations. The Chattanooga Regional Homeless Coalition has a Young Adult Advisory Board to address those ageing out of foster care and unaccompanied by adults (ages 18-25)

Appendix C

Feb 9, 2022, 2:24 PM

From: Elise Anderson

to Cassie O'Neill

Hey Cassie!

I read through the whole allocation plan that you wrote and thought the data was so incredibly helpful. And the transcript from the QandA was, enlightening, to say the least.

My first input is that publicizing the public forum should have been a little more wide spread. I would have been there front row if I knew about it but one thing in the Times Free Press just doesn't seem like enough to me. I mean I actually have my ear to the ground on these things and I didn't hear a peep.

Ok, so opinions on the plan itself. When the full spectrum of the housing crisis and homeless is looked at it is painfully obvious that Chattanooga as a city is failing on all fronts. This is obviously mishandling of resources and systematic breakdowns that go back decades. Now that we have this influx of funds we have an opportunity to right some of these wrongs and save lives. I fully support a good chunk of the money going towards the development of low income housing, or at least affordable rental units. But the fact that zero percent of the funds are going to shelter development, or non-profit support is insane. People are dying on the streets every day and there are at least 400 people without a bed space. The city has a chance to meet a need quickly and is ignoring that chance. Instead focusing on development projects that will take years to complete.

Thanks for your time.

Elise Anderson

Feb 10, 2022, 11:32 AM

Cassie O'Neill
<cnoneill@chattanooga.gov>

to Elise

Thank you for your feedback, Elise. I'll be sure to incorporate it into the allocation plan.

Sincerely,

—

Cassie O'Neill (she/her), MSW, MPA
Manager, Office of Homelessness & Supportive Housing
City of Chattanooga, Tennessee
Office - 423.643.7661

HOME-ARP CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the participating jurisdiction certifies that:

Affirmatively Further Fair Housing --The jurisdiction will affirmatively further fair housing pursuant to 24 CFR 5.151 and 5.152.

Uniform Relocation Act and Anti-displacement and Relocation Plan --It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It will comply with the acquisition and relocation requirements contained in the HOME-ARP Notice, including the revised one-for-one replacement requirements. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42, which incorporates the requirements of the HOME-ARP Notice. It will follow its residential anti-displacement and relocation assistance plan in connection with any activity assisted with funding under the HOME-ARP program.

Anti-Lobbying --To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

Authority of Jurisdiction --The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations and program requirements.

Section 3 --It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 75.

HOME-ARP Certification --It will use HOME-ARP funds consistent with Section 3205 of the American Rescue Plan Act of 2021 (P.L. 117-2) and the CPD Notice: *Requirements for the Use of Funds in the HOME-American Rescue Plan Program*, as may be amended by HUD, for eligible activities and costs, including the HOME-ARP Notice requirements that activities are consistent with its accepted HOME-ARP allocation plan and that HOME-ARP funds will not be used for prohibited activities or costs, as described in the HOME-ARP Notice.



Signature of Authorized Official

3/2/22

Date

Mayor

Title

Application for Federal Assistance SF-424

*** 1. Type of Submission:**

- ☐ Preapplication
☒ Application
☐ Changed/Corrected Application

*** 2. Type of Application:**

- ☒ New
☐ Continuation
☐ Revision

*** If Revision, select appropriate letter(s):**

*** Other (Specify):**

*** 3. Date Received:**

02/28/2022

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

*** a. Legal Name:**

City of Chattanooga

*** b. Employer/Taxpayer Identification Number (EIN/TIN):**

626000259

*** c. UEI:**

XG59NFSC1GD1

d. Address:

*** Street1:**

101 E 11th Street, Suite 200

Street2:

*** City:**

Chattanooga

County/Parish:

*** State:**

TN: Tennessee

Province:

*** Country:**

USA: UNITED STATES

*** Zip / Postal Code:**

37402-4201

e. Organizational Unit:

Department Name:

Economic Development

Division Name:

Housing and Community Invest.

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:

*** First Name:**

Sandra

Middle Name:

*** Last Name:**

Gober

Suffix:

Title: Manager, Housing and Community Investment

Organizational Affiliation:

*** Telephone Number:** 423-643-7332

Fax Number: 423-643-7341

*** Email:** sgober@chattanooga.gov

Application for Federal Assistance SF-424

* 9. Type of Applicant 1: Select Applicant Type:

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

* 10. Name of Federal Agency:

U.S. Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.239

CFDA Title:

Home Investment Partnerships Program ARP Funds

* 12. Funding Opportunity Number:

14.239

* Title:

Home Investment Partnerships Program ARP Funds

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

* 15. Descriptive Title of Applicant's Project:

HOME Projects - Tenant Based Rental Assistance and development of affordable rental housing

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424**16. Congressional Districts Of:**

* a. Applicant

3

* b. Program/Project

3

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:

* a. Start Date:

07/01/2022

* b. End Date:

06/30/2030

18. Estimated Funding (\$):

* a. Federal	2,966,210.00
* b. Applicant	0.00
* c. State	0.00
* d. Local	0.00
* e. Other	0.00
* f. Program Income	0.00
* g. TOTAL	2,966,210.00

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**☐ a. This application was made available to the State under the Executive Order 12372 Process for review on☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.☒ c. Program is not covered by E.O. 12372.*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix:

* First Name:

Tim

Middle Name:

* Last Name:

Kelly

Suffix:

* Title:

Mayor, City of Chattanooga

* Telephone Number:

423-643-7800

Fax Number:

* Email:

mayor@chattanooga.gov

* Signature of Authorized Representative:



* Date Signed:

3/2/22

ASSURANCES - NON-CONSTRUCTION PROGRAMS

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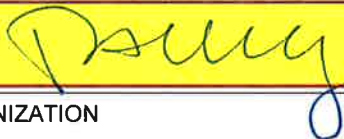
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NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the awarding agency. Further, certain Federal awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
5. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
6. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee- 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.
7. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
8. Will comply, as applicable, with provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

9. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333), regarding labor standards for federally-assisted construction subagreements.
10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
12. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
13. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
18. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
19. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE Mayor, City of Chattanooga
APPLICANT ORGANIZATION City of Chattanooga	DATE SUBMITTED 3/2/22

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
Expiration Date: 02/28/2022

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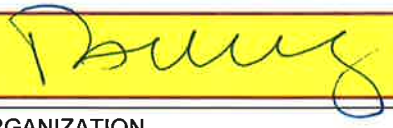
PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE Mayor, City of Chattanooga
APPLICANT ORGANIZATION City of Chattanooga	DATE SUBMITTED 3/2/22