

**HOME-ARP ALLOCATION PLAN  
CITY OF JACKSON, TN**



*Jackson Housing Authority  
Community Development*

*December 2021*

## **Consultation**

### ***Summarize the consultation process:***

Since the start of the coronavirus pandemic, the City of Jackson consulted with several local services providers, city departments and other local organizations while identifying priority needs for the homeless and at-risk populations over the last year. Prior to knowledge that the City would receive HOME-ARP funding, the city and partners had already begun meeting, at the least, monthly in 2020 in an effort to address the issues with the homeless population amid the coronavirus pandemic. The consultation process primarily consisted of outreach to local organizations through a series of focus group meetings and some community meetings. These groups including homeless providers (Jackson-West TN Continuum of Care, Inc., ESG Homeless Providers), fair housing groups, public housing officials, domestic violence providers, disabled/accessibility service providers, other public service homeless providers including the Veteran's Administration, and Regional Interfaith Association. These consulted stakeholders have pertinent knowledge to reference the needs, service gaps, and potential activities that would best benefit qualified populations.

### ***List the organizations consulted, and summarize the feedback received from these entities.***

<b>Agency/Org Consulted</b>	<b>Type of Agency/Org</b>	<b>Method of Consultation</b>	<b>Feedback</b>
Jackson Housing Authority	Public Housing Authority	In person monthly meetings	Expressed need for more affordable housing options, development of affordable housing. JHA is supportive of affordable housing investments in the City. Regular meetings will continue to discuss current projects and plans for potential future projects and initiatives to address homeless needs.
Jackson/West TN Continuum of Care	Continuum of Care	Virtual meetings/email consultations	CoC consulted regarding the "Needs Assessment and Gap Analysis" section of Plan. Coordination and strategic planning for homeless needs and identifying resources available.
TN Homeless Solutions	Non-profit Agency/Homeless Service Provider	In person & virtual focus group meetings	Homeless service and housing providers have worked at the highest intensity level during the COVID-19. THS needs more resources to shelter the homeless and help stabilize.

WoMen's Resource & Rape Asst. Program	Non-profit Agency/Domestic Violence Service Provider	Virtual meetings/ email consultations	Funding need for more safe, affordable housing for single mothers with children. There is also a need for transitional housing and intensive supportive services for mothers and children who have special needs and/or have been severely traumatized by violence in the home.
United Way of West TN	Non-profit Agency	Monthly homeless group meetings, email consultations	Coordination and strategic planning for homeless needs within the City and identifying resources available.
City of Jackson	Local government	Monthly homeless group meetings, email consultations	Coordination and strategic planning for homeless needs within the City and identifying resources available.
Regional Interfaith Association (RIFA)	Non-profit Agency--Homeless Service Provider	Monthly homeless group meetings	Coordination for homeless needs within the City and identifying their resources available to assist with nutrition/meals.
Area Relief Ministries	Non-profit Agency--Homeless Service Provider	Monthly homeless group meetings, email consultations	Coordination and strategic planning for homeless needs within the City and identifying resources available.
Veteran's Administration	Veterans' Groups	Individual outreach via email.	Need for a shelter due to sometimes having to resource out vets because there is no shelter for them.
Dream Center	Non-profit Agency--Homeless Service Provider	Monthly homeless group meetings, email consultations	Coordination and strategic planning for homeless needs within the City and identifying resources available.
Jackson Center for Independent Living	Non-profit Agency--Disability/Accessibility Service Provider	Email consultations	Discussion of accessibility needs for the disabled whether they are homeless or at risk of homelessness to due accessibility issues.
West TN Legal Services	Non-profit Agency--Fair Housing	Focus group meetings, email consultations	Hard to find shelter for homeless men than any other homeless population. There is a need for quality & affordable single-family homes for the PHA's Housing Choice Voucher program.
Jackson Community Redevelopment Agency	Non-profit Agency	Monthly homeless group meetings, email consultations	Coordination and strategic planning for homeless needs within the City and identifying resources available.

## **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 comment period: start date - 10/28/2021 end date - 11/29/2021***
- ***Public hearing: 11/17/2021***
- ***City Council 12/7/2021***

Citizen participation process included holding a public hearing on presentation of the proposed Annual Action Plan 2021-2022 Substantial Amendment for the HOME-ARP funds. Publication of the notice of the hearing and review period was published in the West Tennessee Crimeseen Examiner, a minority owned local newspaper. In addition, the notice was emailed to nonprofit agencies in the community. The notice was accessible in Spanish, if needed. The public hearing was held virtually via Zoom due to coronavirus rise in cases. This public hearing was held on November 17, 2021, at 3:00 pm. The Annual Action Plan Amendment 2021-2022 was presented to the Jackson Housing Authority's Board of Commissioners and Jackson City Council for resolution of approval. In all meeting advertisements, special accommodations (including translation, interpretation, and services for the hearing impaired) were made available, but none were requested.

***Describe any efforts to broaden public participation:***

The City of Jackson made considerable outreach to the public and interested agencies to broaden public participation in the development of proposed projects for the HOME-ARP funding and plan amendment. In addition to the agency outreach, the City sought input to develop the plan through the solicitation of comments, focus groups, emails, and a public hearing.

***Summarize the comments and recommendations received through the public participation process:***

No comments or recommendations were received through the public participation process.

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

There were no comments not accepted.

## **Needs Assessment and Gaps Analysis**

***Describe the size and demographic composition of qualifying populations within the PJ's boundaries:***

According to 2019 ACS 1-Year Estimates, the population for the City of Jackson, TN is 68,205 of which males make up approximately 46% of this population and females make up 54% of the population. The 2021 Point in Time Count (PITC) showed a total of 98 individuals and 5 families (38 people) that were homeless. Over 70% of the homeless counted were unsheltered. Of the total individuals that were experiencing homelessness, it is estimated that approximately 65% were males. Based upon this data, 1 in every 350 men are homeless and 1 in every 700 females are homeless within the City of Jackson.

***Describe the unmet housing and service needs of qualifying populations, including but not limited to:***

### **Sheltered and unsheltered homeless populations**

Information from the 2021 PITC shows that the largest segment of unsheltered homeless is persons in households with adults only, making up approximately 72% of total homeless counted. Chronically homeless individuals are the second largest category at approximately 21%. For sheltered populations, households with adults only again makes up the largest section, with chronically homeless individuals following. Compared to 2020 PITC for Madison County, overall, there was a slight increase in persons experiencing homelessness.

In the City of Jackson, the unsheltered homeless men population is higher than other populations because there is no shelter for men. The temporary shelter program for homeless men that was in place was shut down due to the coronavirus pandemic. Under the temporary program, churches would house the men overnight. But coronavirus forced the shutdown of many churches volunteering the service any longer.

The most recent Housing Inventory Chart (HIC) shows 23 family beds as opposed to the PITC showing 5 families (38 people) homeless. The HIC shows 15 adult only beds as opposed to 98 individuals homeless. This correlates to an approximate 40% unmet need in family beds and an 85% unmet need in individual beds.

### **Those currently housed populations at risk of homelessness**

Low-income individuals and families with children that don't have a stable source of income, are at-risk of becoming homeless due to housing cost burden and co-occurring issues that make it difficult to maintain housing stability. The United Way of West Tennessee's Asset Limited, Income Constrained, Employed (ALICE) Report shows that 22% of individuals, 21% of families, and 28% of the elderly population live at the poverty threshold. This means that they are living basically on a survival budget and are one crisis/emergency away from losing housing. The 2019

ACS estimates show that almost 23% of Jacksonians 16 years and over were unemployed. Approximately 63% of female Heads of Households with children have an annual income less than the poverty level. Overall, persons living below the poverty line experience an unemployment rate of 41.7%.

### **Other families requiring services or housing assistance or to prevent homelessness**

**Elderly** – Data from the Consolidated Plan 2020-2024 shows that special needs of elderly households, especially the 910 elderly households who have a severe cost burden greater than 50%, are most likely to be aging in place. Fifty-two percent of those households experiencing severe cost burden are very low-income households (0-30%). As they age in-place, it becomes challenging to maintain residence in their homes due to the increasing need for housing repairs, physical barriers, and medical costs, to name a few.

**Disabled** - Impediments to independent living for the disabled population is not only their disability, but also have less access to resources and may be underemployed or not employed at all. Based on 2019 ACS data, of the total estimated civilian non-institutionalized population of 65,906 in the City of Jackson, an estimated 8,931 persons have a disability, of which only approximately 33% receive Supplemental Social Security income. Factors such as low to no income and cost burden contribute to the need for housing assistance.

**Victims of domestic violence/dating violence, sexual assault, stalking, human trafficking** - According to the Tennessee Bureau of Investigation, in 2020, 1,314 cases were flagged as domestic violence/dating violence, sexual assault, or stalking within Jackson Madison County, with 77% of those cases being female victims and 23% being male. The largest case was simple assault, which made up approximately 71% of total cases. Stalking made up approximately 2% of total cases. Most often victims who are facing domestic violence may require special housing assistance, such as anonymity and supportive services, to escape abusers.

Women's Resource and Rape Assistance Program (WRAP) served approximately 1,100 survivors of domestic violence and/or sexual assault during the 2020 program year. These services include crisis hotline calls, case management, emergency shelter, referrals, court accompaniment, hospital accompaniment, psychoeducational counseling, and resource linkage. WRAP serves at 100% capacity with 16 emergency shelter beds and persons in sheltered in hotel rooms.

**Veterans** - The U.S. Department of Veteran's Affairs (VA) estimated that approximately 9% of adult homeless population are veterans. Veterans most often have one or both of post-traumatic stress disorder (PTSD) and substance abuse issues. However, according to the January 2021 PITC for Jackson Madison County, there is less than 1% of veterans experiencing homelessness. This could be due to the HUD VASH program working to house homeless veterans and their families.

**Those at greatest risk of housing instability or in unstable housing situations**

The Housing Needs section of the City's Consolidated Plan 2020-2024 examines housing, community, and economic development needs of residents. Housing cost burdens and poor-quality housing are most associated with instability and increased risk of homelessness. Small, related families and elderly households have a high-cost burden percentage. These extremely low- and low-income households are most at risk of becoming homeless.

**Cost Burden** - Cost burden and severe cost burden, for both renter and owner households, are the most common housing problems that place people at an increased risk of homelessness due to not being able to sustain housing costs. Among low- to moderate-income owner and renter households, 55% are cost burdened, and 42% are severely cost burdened.

**Housing Quality** – The most recent ACS (2019) data shows that for the City of Jackson, there are a total of 29,036 housing units. Of these units, 10,300, or 35%, are 50 years or older. The majority of the older housing stock lies within the low-income census tracts. These units are most often in dire need of rehabilitation or demolition due to the substantial rehabilitation needs and contribute to cost burden.

***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***

The City of Jackson currently receives an annual allocation of approximately \$956,000 in federal formula grant funding from the CDBG and the HOME Grant. Also, there are homeless provider agencies that receive Emergency Solutions Grant funding, which collectively totals to an approximate \$350,000 annually. The City, along with ESG agencies and other partnering non-profit agencies, work together to assist low-income families/individuals with obtaining affordable homes, supportive services, rental assistance, shelter, and other services as may be needed.

The Jackson/West TN Continuum of Care was approved for the FY2020 \$1,734,678 Continuum of Care grant for nineteen projects in the West Tennessee CoC Network region. This included seven projects for the Jackson community in the amount of \$470,405. One of the projects for Jackson is a Rapid Rehousing project. Some of these projects have a case management piece, along with PATH case management, which helps to identify gaps in clients' life, skills, and support networks to better connect them to the appropriate resources (i.e., job skills training, mental health and substance abuse treatment, GED classes, etc.).

There is currently no non-congregate shelter in the city of Jackson. However, there are current congregate shelters, primarily for women and children, that are following guidelines to safely house persons during the coronavirus pandemic and provide case management and other supportive services. Those shelters are listed below.

- **Room In The Inn (temporary shelter-men)**. This project was a partnership between Area Relief Ministries and the faith-based community that offered only a temporary solution to

emergency shelter for approximately 25 homeless men. **Since the coronavirus pandemic, RITI has had challenges due to churches not participating due to the coronavirus.** This has left a gap in needed shelter places for homeless men. However, prior to the program becoming unable to operate as needed, homeless men were provided overnight shelter and meals by local churches. ARM coordinated the shelter with approximately 50 participating local churches in the community and provided a pickup site from which the men were transported to the local churches each night. ARM provided sleeping bags and other commodities to the men. The churches hosted the men for dinner, shelter, and breakfast. ARM also has a daytime hospitality and case management center, The Open Arm, for homeless men and women that offers job training, GED tutoring, showers, laundry, lockers, and postal addresses for guest if needed.

- The Dream Center (women/children) Dream Center provides 25 beds for emergency and transitional shelter for women and women with children. The Dream Center offers not only shelter, but GED classes, job readiness, transportation, addiction-recovery programs, financial self-sufficiency classes, parenting, and assistance with finding permanent housing.
- WRAP (victims of DV) WRAP provides counseling, 16 beds of emergency and transitional shelter for domestic violence abuse persons, primarily women. The shelters are in disclosed locations for the safety of the clients. WRAP also operates in Gibson County, a county north of Madison County.
- The Care Center (women/children) The Care Center provides 6 beds for emergency and transitional shelter for homeless women and women with children and/or women who are victims of domestic violence. The Care Center provides supportive services that may include, life skills, job readiness, transportation, self-sufficiency, and housing assistance.

Tennessee Homeless Solutions is temporarily providing emergency shelter for the homeless using Emergency Solutions Grant CARES Act funding to lease a hotel. THS also operates the homeless hotline and the Coordinated Entry System for the Jackson/West TN Continuum of Care. THS provides case management, which involves employment assistance, benefits assistance, housing, health, and other social service needs as it may pertain to the individual client.

The JHA has approximately 1,032 total public housing and LIHTC units and 1,450 housing choice vouchers for low-income persons. Aside from JHA's housing programs, there are approximately 1,000 more LIHTC or PBRA subsidized housing units within the city.

There are agencies that receive ESG and CoC funding for Permanent Supportive Housing and/or Rapid Rehousing. Per the Housing Inventory Chart 2021, the PSH and RRH beds total for Jackson is 73. This includes the 25 HUD-VASH vouchers for veterans that the Jackson Housing Authority administers. These vouchers are 100% leased. The Rapid Rehousing programs offer participants supportive services to help them achieve long-term housing stability.

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

The most recent Housing Inventory Chart (HIC) shows 23 family beds as opposed to the PITC showing 5 families (38 people) homeless. The HIC shows 15 adult only beds as opposed to 98 individuals homeless. This correlates to an approximate 40% gap in the need for family beds and an 85% gap in the need for individual beds, particularly for men. The gap in shelter needs would only increase due to the necessity for non-congregate sheltering during the coronavirus pandemic.

Amid the coronavirus pandemic, shelter capacity for most homeless shelter agencies has increased. However, the greatest gap in services is for the homeless men population because they make up the largest of unsheltered homeless populations due to there is no shelter for men. Prior to COVID-19, there was a temporary shelter program for homeless men in place that closed due to the pandemic. Under the temporary program, churches would house the men overnight. But coronavirus forced the shutdown of many churches that volunteered for the program.

American Community Survey 2019 and HUD CHAS data shows that there are currently 12,504 renter occupied housing units. Of these renters, roughly 7,390 (59%) have income 80% or less of HAMFI and 3,265 (26%) have housing cost burden of 50% or greater.

***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 primary focus of the City will be the homeless population. However, a great indicator of housing instability and increased risk of homelessness is housing cost burden, or a household which is paying more than 30% of their income towards housing related costs, particularly for renter households. Those most susceptible to instability or increased risk of homelessness are the households with incomes that are 50% or 30% below the area median income.

***Identify priority needs for qualifying populations:*****Homeless**

Based upon data from the City’s Consolidated Plan 2020-2024, the number of unsheltered persons is overwhelming considering the differences in numbers of the unsheltered versus sheltered. Ratio of unsheltered to sheltered is 90:1 and for homeless households with children that ratio is also 90:1. Amid the coronavirus pandemic, the shelter options have lessened due to closures, and the need to provide non-congregate space. This indicates a need for more street outreach, case management, and emergency/transitional shelter options that provide short-term, mid-term, and long-term interventions, as well as a need for more permanent housing assistance such as Housing Choice Vouchers to meet the permanent housing needs.

### At-Risk of Homelessness Populations

Low-income individuals and families with children that don't have a stable source of income, are at-risk of becoming homeless due to housing cost burden and co-occurring issues that make it difficult to maintain housing stability. The United Way of West Tennessee's Asset Limited, Income Constrained, Employed (ALICE) Report shows that 22% of individuals, 21% of families, and 28% of the elderly population live at the poverty threshold. Those who are at-risk of homelessness need more affordable housing options. On-going case management services would assist with stabilizing the at-risk population with housing.

### Domestic Violence Populations

Families or individuals fleeing domestic or dating violence, sexual assault, stalking need increased safety measures to minimize the risk of returning to unsafe residential environments. This qualified population has a critical need for temporary shelter for safe harboring and supportive services to help them transition to permanent supportive housing. These families and individuals also need supportive services to assist them like the legal advocacy, childcare, employment services, and case management.

### Other Populations

Families and/or individuals living at greatest risk of housing instability or in unstable housing situations often encounter multiple challenges with staying housed. Their needs often include rental and/or utility assistance. There is also a need for more decent, safe and affordable housing options. However, most of these households will also need a livable wage and supportive services to create long-term self-sufficiency.

### ***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 including the Housing Inventory Count and Point in Time Count data, 2014-2018 HUD CHAS data, and the U.S. Census 2019 ACS data for Jackson, TN. A review of available resources for each population was also analyzed.

For the qualifying populations, those who are currently homeless (both sheltered and unsheltered), domestic violence survivors and related populations, and those requiring supportive services to stay housed the level of need and current gaps in services were determined using the consultations with service providers for each of those qualifying populations, as well as the previously referenced data.

For households that are currently housed but at risk of homelessness, the level of need was measured by the number of households that had affordable, safe, and decent living conditions and the number of renter households that are experiencing severe housing cost burdens. These households need assistance to help them to stay in permanent housing without them being burdened by the cost, the level of need was determined by consultation with the Jackson Housing

Authority, review of the cost burden 2014-2018 CHAS data, and review of available rental/utility assistance and housing repair resources in the community

### **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:***

Pending HUD approval of the HOME-ARP allocation plan, the Jackson Housing Authority (administrator of CDBG and HOME funds for the City) will contract with the City as the future owner of the non-congregate homeless men's shelter to develop the shelter. The City will be in charge of the development of the shelter and the RFP process for contractors and operators of the shelter. The JHA, as administrator, will oversee compliance of the program and funds.

***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 administer the HOME-ARP grant and therefore will not allocate funds to a subrecipient or contractor.

### **Use of HOME-ARP Funding**

	<b>Funding Amount</b>	<b>Percent of the Grant</b>	<b>Statutory Limit</b>
Supportive Services	\$ 0		
Acquisition and Development of Non-Congregate Shelters	\$ 1,048,021.95		
Tenant Based Rental Assistance (TBRA)	\$ 0		
Development of Affordable Rental Housing	\$ 0		
Non-Profit Operating	\$ 0	0 %	5%
Non-Profit Capacity Building	\$ 0	0 %	5%
Administration and Planning	\$ 184,945.05	15 %	15%
<b>Total HOME ARP Allocation</b>	<b>\$ 1,232,967.00</b>		

***Additional narrative, if applicable:***

Not applicable.

***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:***

As detailed in the Homeless Needs Assessment and Gaps Analysis, there is an immediate need for shelter resources for approximately 65 individual males. Of the 98 unsheltered homeless individuals in the community, 65% were single males. Review of the shelter, housing, and service delivery resource data that is available provides insights into the gaps in need. The data shows that the Jackson community does have shelters and supportive service capacity for women and children but lacks any type of shelter for homeless men, and most importantly at this time, a non-congregate shelter facility.

While there is also a need for more affordable housing, there is funding that is received by different agencies each year to work towards increasing affordable housing units. More services and resources for qualifying populations are needed within the city of Jackson than there is funding for, and HOME-ARP, like other funding, is a limited resource.

The agencies that receive Emergency Solutions Grant funds and Continuum of Care funds in the community provide supportive services for the homeless. The shelter agencies that do not receive these grants also provide case management services for their clients.

### **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:***

Not applicable.

***Describe the specific affordable rental housing production goal that the PJ hopes to achieve and describe how it will address the PJ's priority needs:***

Not applicable.

### **Preferences**

***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 proposes to give preference to homeless male individuals that meet the criteria of this qualifying population. Under this preference, the City will not violate any fair housing, civil rights,

or nondiscrimination requirements at the federal, state, or local level, which includes but is not limited to requirements found in 24 CFR 5.105(a). For any other qualifying populations that do not fit the identified preference, the City will work with the homeless service provider, Tennessee Homeless Solutions to utilize the CoC's Coordinated Entry System, as well as for preferences. The City will also coordinate services with local homeless and housing service providers.

***If a preference was identified, explain how the use of a preference or method of prioritization will address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or category of qualifying population, consistent with the PJ's needs assessment and gap analysis:***

Addressing the unmet need of year-round shelter for homeless men in the community will help decrease the overall number of homeless persons on the streets. It will also allow for some stabilization for the men in order to better provide necessary services such as case management, housing assistance, and other supportive services to help the men achieve self-sufficiency and permanent housing opportunities.

***If a preference was identified, describe how the PJ will use HOME-ARP funds to address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in the preference:***

The City will continue to invest its annual allocations of HOME funds into affordable housing solutions for the low-income community, which would include all qualifying populations. Collaboration with homeless service providers that receive the Emergency Solutions Grant funds and Continuum of Care funds for homelessness prevention and rapid rehousing can also be used to assist the other qualifying populations. Rental and utility assistance is provided through the local United Way and Southwest Human Resource Agency to assist those at risk of being homeless. For those fleeing domestic violence, sexual assault, etc. Continuum of Care and ESG funds are utilized by a local domestic violence provider agency who also has a 24 hour crisis hotline for victims. For other populations where providing supportive services or assistance would prevent the family's homelessness, there are agencies with funding sources available. There is a 24-hour homeless hotline available, as well as the CoC's Coordinated Entry System for persons in need of assistance and/or referral to services.

### **HOME-ARP Refinancing Guidelines**

The City does not intend to rehabilitate any multi-family rental housing with HOME-ARP funds. Therefore, the City will not be refinancing any existing debt secured by multifamily rental housing.

- *Establish a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing to demonstrate that rehabilitation of HOME-ARP rental housing is the primary eligible activity*  
-Not Applicable-
- *Require a review of management practices to demonstrate that disinvestment in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of serving qualified populations for the minimum compliance period can be demonstrated.*  
-Not Applicable-
- *State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.*  
-Not Applicable-
- *Specify the required compliance period, whether it is the minimum 15 years or longer.*  
-Not Applicable-
- *State that HOME-ARP funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.*  
-Not Applicable-
- *Other requirements in the PJ's guidelines, if applicable:*  
-Not Applicable-

## 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

  
\_\_\_\_\_  
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:**

**4. Applicant Identifier:**

**5a. Federal Entity Identifier:**

**5b. Federal Award Identifier:**

M21-MP470207

**State Use Only:**

**6. Date Received by State:**

**7. State Application Identifier:**

**8. APPLICANT INFORMATION:**

**\* a. Legal Name:** City of Jackson, Tennessee

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

62-6000316

**\* c. Organizational DUNS:**

030430862

**d. Address:**

**\* Street1:** 101 East Main Street

**Street2:** c/o 125 Preston Street

**\* City:** Jackson

**County:**

**\* State:** Tennessee

**Province:**

**\* Country:** USA: UNITED STATES

**\* Zip / Postal Code:** 38301

**e. Organizational Unit:**

**Department Name:**

Community Development

**Division Name:**

Jackson Housing Authority

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

**Prefix:**  **\* First Name:** Mark

**Middle Name:** C.

**\* Last Name:** Reid

**Suffix:**

**Title:** Executive Director

**Organizational Affiliation:**

**\* Telephone Number:** 731-422-1671

**Fax Number:** 731-425-4605

**\* Email:** mreid@jacksonha.com

**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 Partnership Program

**\* 12. Funding Opportunity Number:**

-na-

**\* Title:**

-na-

**13. Competition Identification Number:**

**Title:**

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

**\* 15. Descriptive Title of Applicant's Project:**

Jackson Community Development Program - HOME American Rescue Plan Project

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

\* b. Program/Project

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

### 17. Proposed Project:

\* a. Start Date:

\* b. End Date:

### 18. Estimated Funding (\$):

* a. Federal	<input type="text" value="1,232,967"/>
* b. Applicant	<input type="text" value="0"/>
* c. State	<input type="text" value="0"/>
* d. Local	<input type="text" value="0"/>
* e. Other	<input type="text" value="0"/>
* f. Program Income	<input type="text" value="0"/>
* g. TOTAL	<input type="text" value="1,232,967"/>

### \* 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.)

☐ Yes ☒ No

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:   
Middle Name:   
\* Last Name:   
Suffix:

\* Title:

\* Telephone Number:  Fax Number:

\* Email:

\* Signature of Authorized Representative:  \* Date Signed:

### ASSURANCES - NON-CONSTRUCTION PROGRAMS

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0040), Washington, DC 20503.


**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 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
APPLICANT ORGANIZATION	DATE SUBMITTED
City of Jackson, Tennessee	12/20/21

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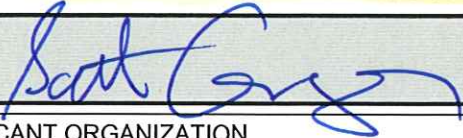
As the duly authorized representative of the applicant, I certify that the applicant:

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).
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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).

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<b>SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL</b> 	<b>TITLE</b> Mayor
<b>APPLICANT ORGANIZATION</b> City of Jackson, Tennessee	<b>DATE SUBMITTED</b> 12/20/21