State of Tennessee
2019-20 Annual Action Plan
Substantial Amendment: ESG-CV Funding

AP-05 Executive Summary
In order to promptly address the COVID-19 pandemic among those who are homeless or threatened with homelessness, THDA will distribute Part I of the ESG CARES Act funding (totaling $11,148,024) in the following manner:

- 90.15% of the allocation, equal to $10,050,000, will be made available to organizations that received a competitive funding award under THDA’s regular 2019 and 2020 ESG programs in THDA’s 2020 service area and to 2020 ESG set-aside cities of Chattanooga, Clarksville, Johnson City, and Murfreesboro. These funds must be used for non-administrative eligible ESG program activities (i.e.: street outreach, shelter operations, rapid re-housing, homelessness prevention, and data collection).
  - Local Government Set-Aside Allocation - $1,500,000
    ▪ Maximum Award Per Grantee – up to $375,000
  - Organizations that were 2019 & 2020 Competitive Funding Grantees - $8,280,000
    ▪ Initial Maximum Award Per Grantee – up to $276,000
    ▪ THDA may exceed the max award up to $400,000 per grantee cap if additional funds remain following the initial award of funds.
  - Continuum of Care Lead HMIS Agencies - $270,000
    ▪ Maximum award per Grantee – up to $30,000 to work with State ESG grantees

- 9.85% of the allocation, equal to $1,098,124, will be allocated for administrative costs of THDA, local governments, and nonprofit organizations as follows:
  - THDA - $549,024
  - Total administrative costs available to Grantees - $549,000
    ▪ $150,000 will be allocated for Local Government Set-Aside Grantees, of which each grantee will receive an amount equal to 10% of Program Award ($37,500)
    ▪ $399,000 will be allocated for Competitive Grantees, of which each grantee will receive an amount equal to 3.97% of the Program Award for general oversight, management, and coordination of grant activities.
The program will operate under the 2020 ESG Program Description requirements, but will adopt all permissions granted under the 2020 CARES Act legislation and as permitted by future HUD guidance, including but not limited to:

- The funds may be used to reimburse allowable costs incurred on or after July 1, 2020 to prevent, prepare for, and respond to COVID-19;
- The funds are not subject to the spending cap on emergency shelter and outreach under 24 CFR 576.100(b)(1);
- The funds are exempt from the ESG match requirements, including 24 CFR 576.201;
- The funds may be used to provide homelessness prevention assistance (as authorized under 24 CFR 576.103 or subsequent HUD notices) to any individual or family who does not have income higher than HUD’s Very Low-Income Limit for the area and meets the criteria in paragraphs (1)(ii) and (1)(iii) of the “at risk of homelessness” definition in 24 CFR 576.3;
- That recipients may deviate from applicable procurement standards when using these funds to procure goods and services to prevent, prepare for, and respond to coronavirus, notwithstanding 24 CFR 576.407(f) and 2 CFR 200.317-200.326;
- Individuals and families experiencing homelessness must not be required to receive treatment or perform any other prerequisite activities as a condition for receiving shelter, housing, or other services for which these funds are used, notwithstanding 24 CFR 576.401(e).
- The ESG CARES Act grants may not exceed $400,000 per award based on a non-competitive allocation. This maximum shall include a process for the reallocation of funds from grant recipients not meeting established performance benchmarks.
- The Application and Evaluation Requirements of the 2020 ESG Program Description shall not apply.
- The grant term will conclude on December 31, 2021.

THDA will issue agreements for the award of ESG CARES Act funds that are separate from those made under the 2019 and 2020 ESG Programs.

Following the initial award of Part 1 funds, THDA will combine any unallocated Part 1 funds with any funds allocated by HUD to the state under the Part 2 allocation.

Allocation Process:

- The streamlined application for ESG CARES Act funding will be available August 17, 2020 through October 10, 2020 on a first-come, first-serve basis.
- THDA will evaluate funding requests in concert with priorities outlined by each CoC to address the response to homelessness priorities created by the COVID-19 pandemic.
Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness

In June 2020, ESG distributed a survey to nonprofits through the CoC’s, past and current ESG grantees, and other state agencies to collect information on current needs and organizational capacity. ESG worked with the CoC’s to identify potential new grantees for the incoming CV funding and also get information on needs and responses to the pandemic. Overall, funding for Emergency Shelter was ranked as the top need, followed closely by Homelessness Prevention. However, THDA will evaluate applications and activity funding priorities based on the needs identified individually by each CoC.

Describe consultation with the Continuum(s) of Care that serves the State in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS

Part of the ESG-CV survey mentioned above also collected information on which agencies currently had HMIS or comparable systems, needs for training, and HMIS capacity.

The CARES Act funding allows additional funds to be distributed to HMIS Leads to cover system modifications and assist them with working with our grantees to collect data and report on ESG CARES Act performance.

AP-12 Participation

The State of Tennessee successfully submitted and was granted a waiver to expedite CARES Act funding by removing the requirements of the Citizen’s Participation Plan. The waiver states that the recipient will publish how the funds are to be used via relevant websites and online platforms. An announcement and this document will serve to fulfil those requirements. This waiver and additional guidance is posted on the HUD Exchange, or you can email Research@thda.org for more information.

Notices will be posted on https://thda.org/research-planning/consolidated-planning and https://thda.org/about-thda/public-notice-and-comment as well as partner websites. Notices will be posted in English and Spanish along with this document, or a link to this document.
AP-15 Expected Resources

<table>
<thead>
<tr>
<th>Program</th>
<th>Uses of Funds</th>
<th>Expected Amount Available Year 5</th>
<th>Narrative Description</th>
</tr>
</thead>
</table>
| ESG-CV  | Financial Assistance  
Overnight shelter  
Rapid re-housing (rental assistance)  
Rental Assistance Services | Annual Allocation: $11,148,024  
Program Income: $0  
Prior Year Resources: $0  
Total: $11,148,024 | ESG COVID-19 CARES Act funding |

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

The ESG-CV funds are exempt from the ESG match requirements (24 CFR 576.201).

AP-20 Annual Goals and Objectives

Please provide your anticipated numerical goal outcomes for the relevant groups using ESG-CV funding:

<table>
<thead>
<tr>
<th>Goals &gt;&gt;</th>
<th>2. Preserve homeless facilities &amp; supportive services</th>
</tr>
</thead>
<tbody>
<tr>
<td>12. Tenant-based rental assistance / Rapid Rehousing (Households Assisted)</td>
<td>12,000</td>
</tr>
<tr>
<td>13. Homeless Person Overnight Shelter (Persons Assisted)</td>
<td>18,300</td>
</tr>
<tr>
<td>15. Homelessness Prevention (Persons Assisted)</td>
<td>2,100</td>
</tr>
</tbody>
</table>

AP-30 Methods of Distribution

<table>
<thead>
<tr>
<th>3</th>
<th>State Program Name: ESG-CV (Round 1)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Funding Sources: ESG-CV</td>
<td></td>
</tr>
<tr>
<td>Describe the state program addressed by the Method of Distribution.</td>
<td>The first round of ESG-CV funding will operate under the 2020 ESG Program Description and will adopt all permissions granted under the 2020 CARES Act legislation and as permitted by future HUD guidance. The ESG Program is designed to identify sheltered and unsheltered homeless persons, as well as those at risk of homelessness, and provide the services necessary to help those persons to quickly regain</td>
</tr>
</tbody>
</table>
stability in permanent housing after experiencing a housing crisis and/or homelessness.

The ESG program funds 5 major types of projects: Street Outreach, Emergency Shelter, Homelessness Prevention, Rapid Rehousing, and HMIS/data collection.

| Describe all of the criteria that will be used to select applications and the relative importance of these criteria. | THDA will evaluate funding requests in concert with priorities outlined by each CoC to address the response to homelessness priorities created by the COVID-19 pandemic.

The Application and Evaluation Requirements of the 2020 ESG Program Description shall not apply. |
|---|---|

| 90.15% of the allocation, equal to $10,050,000, will be made available to organizations that received a competitive funding award under THDA’s regular 2019 and 2020 ESG programs in THDA’s 2020 service area and to 2020 ESG set-aside cities of Chattanooga, Clarksville, Johnson City, and Murfreesboro. These funds must be used for non-administrative eligible ESG program activities (i.e.: street outreach, shelter operations, rapid re-housing, homelessness prevention, and data collection). |
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|---|---|

Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only) | 90.15% of the allocation, equal to $10,050,000, will be made available to organizations that received a competitive funding award under THDA’s regular 2019 and 2020 ESG programs in THDA’s 2020 service area and to 2020 ESG set-aside cities of Chattanooga, Clarksville, Johnson City, and Murfreesboro. These funds must be used for non-administrative eligible ESG program activities (i.e.: street outreach, shelter operations, rapid re-housing, homelessness prevention, and data collection). |
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Total Available to Grantees - $549,000

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- $399,000 will be allocated for Competitive Grantees, of which each grantee will receive an amount equal to 3.97% of the Program Award for general oversight, management, and coordination of grant activities.
| **Describe how resources will be allocated among funding categories.** | The funding categories within ESG are: Street Outreach; Emergency Shelter; Prevention; Rapid Re-housing; and Data Collection. The Application and Evaluation Requirements of the 2020 ESG Program Description shall not apply. The streamlined application for ESG CARES Act funding will be available August 17, 2020 through October 10, 2020 on a first-come, first-serve basis. THDA will evaluate funding requests in concert with priorities outlined by each CoC to address the response to homelessness priorities created by the COVID-19 pandemic. The funds are not subject to the spending cap on emergency shelter and outreach under 24 CFR 576.100(b)(1). |
| **Describe threshold factors and grant size limits.** | The ESG CARES Act grants may not exceed $400,000 per award based on a non-competitive allocation. This maximum shall include a process for the reallocation of funds from grant recipients not meeting established performance benchmarks. Prospective grantees will be limited to those identified in its 2020 ESG Program Description as Set-Aside Cities or are recipients of ESG funds from THDA under its 2019 or 2020 ESG Program Description. The funds may be used to reimburse allowable costs incurred on or after July 1, 2020. |
| **What are the outcome measures expected as a result of the method of distribution?** | HUD guidance allows for a broader range of activities to assist those who have been impacted by COVID-19. These changes include, but are not limited to the following:
- The funds may be used to provide homelessness prevention assistance (as authorized under 24 CFR 576.103 or subsequent HUD notices) to any individual or family who does not have an income higher than HUD’s Very Low-Income Limit for the area and meets the criteria in paragraphs (1)(ii) and (1)(iii) of the “at risk of homelessness” definition in 24 CFR 576.3; |
That recipients may deviate from applicable procurement standards when using these funds to procure goods and services to prevent, prepare for, and respond to coronavirus, notwithstanding 24 CFR 576.407(f) and 2 CFR 200.317-200.326;

- Individuals and families experiencing homelessness must not be required to receive treatment or perform any other prerequisite activities as a condition for receiving shelter, housing, or other services for which these funds are used, notwithstanding 24 CFR 576.401(e).

- The Tennessee ESG Policies and Procedures Manual instructs grantees to adopt performance standards consistent with HUD and THDA program requirements. Examples of outcome measures expected are: reducing the average length of time a person is homeless; reducing returns to homelessness; improving program coverage; reducing the number of homeless individuals and families; reducing the number of chronically homeless individuals and families; improving employment rate and income amounts of program participants; reducing first time homelessness; preventing homelessness and achieving independent living in permanent housing for families and youth defined as homeless under other Federal programs.
AP-50 Geographic Distribution

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

ESG-CV: THDA will evaluate funding requests in concert with priorities outlined by each CoC to address the response to homelessness priorities created by the COVID-19 pandemic.

During this initial round of ESG-CV funding, THDA will only award organizations that were either (1) recipients of regular ESG funds under its 2019 or 2020 ESG Program Descriptions or (2) were a set-aside city under the 2020 ESG Program Description. No geographic priorities will be established.

Rationale for the priorities for allocating investments geographically

No geographic priorities have been established.