



## **Community Development Block Grant**

**2021 – HUD Action Plan  
FY '22 – City of Kingsport Budget**

Prepared for:  
The US Department of Housing and Urban Development

Prepared by:  
City of Kingsport, Community Development Office



# Executive Summary

## AP-05 Executive Summary - 91.200(c), 91.220(b)

### 1. Introduction

The City of Kingsport, Tennessee is a part of the Kingsport-Bristol-Bristol, Tennessee-Virginia Metropolitan Statistical Area and is a Department of Housing and Urban Development Community Development Block Grant Entitlement City. As such, Kingsport receives a formulated amount of funds annually. The CDBG program is authorized under Title 1 of the Housing and Community Development Act of 1974, Public Law 93-383, as amended; 42 U.S.C.-5301 et seq. This year Kingsport expects to receive \$446,397 in Community Development Block Grant (CDBG) funds. In the unexpected event that the entitlement amounts should increase prior to July 1, 2021, the added amount of CDBG funds will be allocated to housing rehabilitation. If the entitlement amounts should decrease, the reduction will be subtracted from housing rehabilitation.

The projected use of funds has been developed to give maximum priority to activities that will carry out one of the national objectives as follows:

1. Benefit low- and moderate-income (LMI) families.
2. Aid in the prevention or elimination of slums or blight.
3. Other community development areas which demonstrate a particular urgent need or because existing conditions pose a serious and immediate threat to the health or welfare of the community and where other financial resources are not available to meet such needs.

The City of Kingsport, Tennessee certifies that the following activities proposed for the coming year meet one of the three above-listed national objectives.

#### REVENUE:

2020-21 CDBG Allocation: \$446,397.00

CDBG Projected Program Income: \$2,000

2020 Kingsport CDBG Carryover: Approx. \$51,080

2019 Kingsport CDBG Carryover: Approx. \$7,900

2018 Kingsport CDBG Carryover: Approx. \$5,407

2017 Kingsport CDBG Carryover: Approx. \$17,524

**EXPENSES:**

Kingsport CDBG Projects:

-Rehabilitation/Emergency Repair: **\$156,807**

2021 Annual Allocation \$131,914 (\$101,914 Homeowner Grants + \$30,000 Rehab Admin)

2019 Kingsport Carryover: Approx. \$22,893 in carryover (Homeowner Grants)

\$2,000 in Program Income

-Demolition (Safe, Decent Housing): **\$81,080**

2021 Annual Allocation - \$41,080

2020 Kingsport CDBG Carryover: Approx. \$40,000

-Community Enrichment (Public Service): **\$66,500**

-Neighborhood Improvement (Public Facilities): **\$40,831**

2020 Kingsport CDBG Carryover: Approx. \$10,000

2019 Kingsport CDBG Carryover: Approx. \$7,900

2018 Kingsport CDBG Carryover: Approx. \$5,407

2017 Kingsport CDBG Carryover: Approx. \$17,524

-Program Administration: **\$87,983**

-Code Enforcement: **\$50,000**

-Section 108 Loan: **\$70,000**

**2. Summarize the objectives and outcomes identified in the Plan**

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

The Consolidated/Strategic Plan provides a guide to address the Cities' needs for five years using CDBG funds as well as other leveraged funds. The Action Plan is for a one-year period. There are three broad national objectives that each project must meet in at least one category. They are:

- Provide decent affordable housing
- Create a suitable living environment
- Create economic opportunities

Outcomes show how programs and activities benefit the community and the people it serves. The three measurable outcomes that will illustrate the benefits of each of this year's activities, as well as the five years covered in the Consolidated Plan, are:

- Improve Availability/Accessibility
- Improve Affordability
- Improve Sustainability

### **3. Evaluation of past performance**

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

During the life of the most recent consolidated plan the CD program has been successful in addressing the needs, goals, and objectives outlined in the plan. The program has developed adequate to good systems for working with local community agencies in delivering public services to low and moderate-income citizens, especially youth and senior populations. Steam-lining of housing rehabilitation services has been effective in broadening outreach to underserved homeowners.

Administratively, HUD monitoring reviews and internal audits indicated good performance. The program has consistently met or exceeded performance requirements as defined by annual timeliness tests with sharpened understanding of IDIS draw down and reporting requirements, update accomplishment data has greatly improved. However, with new staff we fully expect in improve our systems, policy and procedures to fully utilize CDBG funding, while being good stewards of federal funding.

### **4. Summary of Citizen Participation Process and consultation process**

Summary from citizen participation section of plan.

The City of Kingsport's Consolidated Plan is developed through a collaborative process whereby the community identifies local critical needs and assists in establishing an Action Plan. Citizen participation is a critical part of the Consolidated and Action Plans, including developing, amending and reporting on

program performance annually. The City solicits and encourages the participation of all citizens, including minorities, non-English speaking populations, and persons with disabilities.

#### A. Consultations with Other Community Institutions

In development of the Five-Year Consolidated Plan and the Fourth-Year Action Plan, the City consulted with other public and private for-profit and non-profit agencies that either provide or have direct impact on the broad range of housing, health, and social services used by Kingsport residents. These agencies provided knowledge regarding local unmet needs and ongoing critical needs. The Kingsport Board of Mayor and Aldermen has designated the Community Development Advisory Committee (CDAC) as the primary advisory body and as such, information on community needs and priorities have been discussed at their meetings.

#### B. Public Hearings

There were several public meetings from the beginning stages of development of the Plan in order to gather information on community needs from citizens and local service providers until the completion of the plan. In compliance with the Citizen Participation Plan, the first public hearing was held at the Community Development Advisory Committee (CDAC) meeting in Kingsport on **February 12, 2020**, for both CDBG and HOME programs. A second public hearing was then held **June 1, 2020**, at the Kingsport Board of Mayor and Aldermen meeting. Draft copies of the Action Plan were available for review at the Kingsport Public Library, Community Development Office and Kingsport City Hall.

#### C. Written Comments

Based on public input and quantitative analysis, City staff prepared a draft Action Plan covering the CDBG Program. Notification of availability of the draft appeared in three local newspapers and on each city's website. The public was able to review the draft at the Kingsport Public Library, the local Housing Authority office and in Community Development office.

#### D. Action Plan and Public Hearings.

Several public meetings were held pertaining to the Second-Year Action Plan beginning in March, 2021. Drafts of the Plan were made available at the Community Development office, Kingsport Public Library, and Kingsport Housing and Redevelopment Authority. All written and verbal comments provided were considered in preparing the final Action Plan, however it was impossible to fund every project or need. A summary of comments received and the City's responses to comments are included in the final document. The Kingsport Board of Mayor and Alderman considered these comments, the Community Development Advisory Committee recommendations, and staff recommendations in composing the final Plan.

### 5. Summary of public comments

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

All comments will be accepted. City staff have and will continue to consult with local agencies for input. Local agency consultation is a priority of the City and important for partnerships and funding resources to provide much needed public services in the community.

**6. Summary of comments or views not accepted and the reasons for not accepting them**

All comments will be accepted. City staff have and will continue to consult with local agencies for input. Local agency consultation is a priority of the City and important for partnerships and funding resources to provide much needed public services in the community.

**7. Summary**

The Citizens Participation and Consultation process exceeded the base requirements of the most recent Citizen Participation Plan for the Consortium as well as the Plan which the City of Kingsport utilizes for its own jurisdiction. All comments received were accepted, reviewed and used in the development of the Consolidated Plan. The Consortium, as well as the City of Kingsport, will continue to tweak and revise its ongoing citizen participation strategy to, hopefully, continue to open up the process and encourage more intense participation by those affected by the activities described in this plan, as well as the general population of the jurisdiction.

## PR-05 Lead & Responsible Agencies - 91.200(b)

### 1. Agency/entity responsible for preparing/administering the Consolidated Plan

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
CDBG Administrator	KINGSPORT	Grants & Redevelopment

Table 1 – Responsible Agencies

### Narrative

The City of Kingsport's, Department of Community Development, is responsible for the administration of Kingsport, Tennessee's CDBG funds. Kingsport is responsible for preparing the Consolidated Plan, Annual Action Plan and the CAPER. They are also responsible for all IDIS input for CDBG. The City processes all CDBG payments, conducts monthly Community Development Advisory Committee meetings and holds public hearings. Kingsport, Tennessee is ultimately responsible to the Knoxville HUD Field Office for properly administering the CDBG Program.

The City of Kingsport, Tennessee is monitored regularly by the Knoxville Field Office for both the CDBG Program. Kingsport has been receiving CDBG grant funds since 1988 with minimal problems throughout the years.

Kingsport's efforts to broaden public participation in the development of this Action Plan include:

- Holding meetings in ADA-accessible locations
- Including Spanish language in the public hearing ads
- Providing copies of the Draft Plan at central locations, i.e., Kingsport Public Library, online at [www.kingsporttn.gov](http://www.kingsporttn.gov) and in the Community Development office.

**Consolidated Plan Public Contact Information**

Jessica McMurray, Community Development Planner

City of Kingsport, TN

225 W. Center Street

Kingsport, TN 37660

(423)224-2877

JessicaMcMurray@KingsportTN.gov

DRAFT



## **AP-10 Consultation - 91.100, 91.200(b), 91.215(l)**

### **1. Introduction**

Coordination with federal and local agencies, along with non-profit and for-profit organizations providing services to the low- and very-low income in the community is essential for the effectiveness of the CDBG program. Consultation with the community and affected service providers is a fundamental component of the Consolidated Plan and Action Plan process. The City of Kingsport welcomes and encourages the participation of all of its citizens in the development of these plans and in the review of progress in implementing plan activities. The City utilizes a Citizen Advisory Committee. Low- and low-moderate income persons, persons with disabilities, minorities and non-English speaking persons are encouraged to participate in the planning process. Additionally, residents of public housing and other assisted housing are encouraged to voice their needs and their opinions on the participating jurisdictions' current and future direction. Other stakeholders consulted in this plan include community and faith based organizations, health care providers, KHRA, Appalachian Regional Coalition on Homelessness, City and County Departments of Social Services, and school system are encouraged to become involved in the planning process. The City provides translators for non-English speaking persons who request assistance at least 3 days prior to hearings or other meetings in the planning process. Persons who need auxiliary aids or other assistance to be able to fully participate may request assistance at least 3 days in advance of the hearing or meeting. Drafts of the plan have been placed in City Hall, KHRA and in local library branches. Notices of public meetings and hearings have been published in local newspapers.

#### **Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(l)).**

To ensure the participation of and coordination between public and private agencies, the City's staff is frequently involved in various activities with the agencies and regularly attends meetings that address community needs. Remaining in close contact with vital housing and service providers, either in person or by phone, gives staff and the agencies a better understanding of current and changing needs. The City of Kingsport works diligently to keep abreast of issues that exist or that may arise that affect our homeless, special needs, and/or low-income residents. Some of the agencies contacted include: Kingsport Housing and Redevelopment Authority, local health departments, social/human service agencies, United Way, Salvation Army, ARCH, Legal Aid Society, various divisions of the Planning department, including Code Enforcement and Inspections. The City will continue regular consultation with the Board of Directors and staff of the Tennessee Housing Development Agency.

#### **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.**

The City of Kingsport maintain close contact with the Appalachian Regional Coalition on Homelessness (ARCH). City staff attends regular CoC meetings. ARCH meetings regularly have speakers that are either service providers to the homeless, shelter providers, veterans and others who work with families in need. Workshops are periodically held to provide information on the most urgent and current needs of the homeless and to solicit input from local agencies and organizations that may be helpful to other shelter or service providers in better meeting the needs of this population. The City of Kingsport also hired a Social Worker in early 2020 to work within the City Police Department. The Social Worker works directly with the homeless population in providing much needed legal and social service referrals.

**Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area 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**

Kingsport, Tennessee, currently has two homeless service providers in its Continuum of Care. One is the Family Promise of Greater Kingsport and the other is Greater Kingsport Alliance for Development (GKAD). The Family Promise program offers shelter, meals and supportive services to homeless families with minor children. The Family Promise shelter can accommodate up to 14 families. Family Promise is the only shelter in Kingsport that can accommodate two-parent families, families with teenaged boys and single fathers with teenage girls. GKAD serves low-moderate income families who are at-risk for homelessness or homeless, in partnership with the Kingsport Housing and Redevelopment Authority, GKAD provides services to keep individuals and families housed as well as assist in providing transitional housing and referral services as needed. Both agencies are familiar with ARCH, and partner their efforts to assist the homeless in our community.

The Tennessee Housing Development Agency provides state ESG funding to nonprofit organizations within the Consortium area.

**2. Agencies, groups, organizations and others who participated in the process and consultations**

**Table 2 – Agencies, groups, organizations who participated**

1	<b>Agency/Group/Organization</b>	KHRA
	<b>Agency/Group/Organization Type</b>	PHA Services - Housing Services-homeless Service-Fair Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Strategy HOPWA Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	he Kingsport Housing and Redevelopment Authority will continue to provide safe and secure housing for low-income elderly residents, as well as families. Kingsport Housing is also using the Section 8 voucher program to assist residents into homeownership. The Kingsport Housing and Redevelopment Authority and the City staff have regular meetings at which all areas of service and needs are discussed. Continuous improvements in services and outreach are discussed.

2	<b>Agency/Group/Organization</b>	Appalachian Regional Coalition on Homelessness
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Services-Employment Services - Victims Regional organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth HOPWA Strategy Market Analysis Anti-poverty Strategy

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	ARCH was consulted regarding needs of the chronically homeless, homeless veterans and unaccompanied youth. ARCH has an office in Johnson City that serves the entire Consortium area. They are working with the VA Center, housing agencies, the VASH program, talking with housing agencies concerning persons returning from institutions and pursuing better and additional services for persons with mental disorders. City staff attend monthly meetings and other planning meetings with staff. ARCH staff provided direct comments and input on the Consolidated Plan.
3	<b>Agency/Group/Organization</b>	City of Kingsport
	<b>Agency/Group/Organization Type</b>	Other government - Local Planning organization
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Market Analysis Economic Development
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Community Development office is part of the City's Planning staff. Other Planning staff have direct, daily input.
4	<b>Agency/Group/Organization</b>	United Way of Greater Kingsport
	<b>Agency/Group/Organization Type</b>	Business and Civic Leaders Foundation
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless Homelessness Strategy Market Analysis Anti-poverty Strategy

<p><b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b></p>	<p>The United Way has recently undertaken two community initiatives, with a recently developed AVENUE program to assist individuals recovering from addiction and the Kingsport Homeless Coalition, which strategizes and develops a plan to end homelessness in the City of Kingsport. City of Kingsport is member and integral participant in United Way. Staff regularly consult concerning community needs.</p>
---	---

**Identify any Agency Types not consulted and provide rationale for not consulting**

We are not aware of any agency that should have been consulted but was not.

**Other local/regional/state/federal planning efforts considered when preparing the Plan**

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	ARCH	Both were developed with housing and service needs of the homeless. ARCH has provided direct response for the Strategic Plan.

**Table 3 - Other local / regional / federal planning efforts**

**Narrative**

The Appalachian Regional Coalition on Homelessness is the region's Continuum of Care organization in Tennessee. Nonprofit service agencies who are members of ARCH attend monthly meetings and provide data on the homeless through the Homeless Management Information System (HMIS).

The Tennessee Housing Development Agency provides state Emergency Shelter Funds to nonprofit organizations, i.e., homeless service providers, who, in turn, attempt to address the needs of the homeless.

## **AP-12 Participation - 91.401, 91.105, 91.200(c)**

### **1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting**

The Citizens' Participation Plan that was developed for the City of Kingsport, Tennessee. There were several public meetings from the beginning stages of development of the Plan in order to gather information on community needs from citizens and local service providers. In compliance with the Citizen Participation Plan, the first public hearing was held at a Community Development Advisory Committee (CDAC) meeting in Kingsport on February 12, 2021, for the CDBG program. A second public hearing will be held on May 18, 2021, Kingsport, Tennessee Board of Mayor and Alderman meeting. Draft copies of this Action Plan were made available to the public at the Kingsport Public Library, Kingsport City Hall, online, and at the Community Development Department. All meetings were conducted in locations that were accessible to disabled persons and advertisements indicated that arrangements would be made for non-English speaking persons and for the hearing impaired.

**Citizen Participation Outreach**

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Newspaper Ad	Minorities Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing	Notice of the Public Meeting was published February 1, 2021. No comment was received.	None	There were no comments received	
2	Public Meeting	Minorities Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing	This public meeting was held on February 12, 2021. No general public was in attendance, no public comment was received.	None	There were no comments received	



Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
3	Public Meeting	<p>Minorities</p> <p>Non-English Speaking - Specify other language: Spanish</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p>	<p>Notice of Funding Availability was published April 2, 2021, notice invited Public Service Agencies to apply for 2021-2022 CDBG funds.</p>	None	There were no comments received	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
4	Public Hearing	<p>Minorities</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p>	<p>This public meeting was held on May 18, 2021 at the Kingsport Board of Mayor and Aldermen meeting.</p>			

Table 4 – Citizen Participation Outreach

## Expected Resources

### AP-15 Expected Resources - 91.420(b), 91.220(c)(1,2)

#### Introduction

The City of Kingsport receives CBDG funds as an entitlement city.

The City of Kingsport also received CBDG-CV funding in 2019/2020 through the Coronavirus Relief and Recovery CARES Act to prevent, prepare for, and respond to the COVID-19 pandemic. Kingsport designated funding based on area needs. The City of Kingsport is not expected to receive any additional CARES funding.

#### Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	446,397	2,000	104,805	553,202	1,317,000	CDBG funds will support housing and non-housing needs in the City of Kingsport, TN.

**Table 5 - Expected Resources – Priority Table**

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

To leverage funding for Safe, Decent and Affordable Housing, the City of Kingsport will partner with local organizations such as the Carpenters Helpers and Appalachian Service Project to off set housing repair costs through the use of volunteer labor. CDBG program allocations will also be leverage through general funds dollars, partnerhsips with local service providers and in-kind contributions.

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

**Discussion**

The City of Kingsport, Tennessee is a part of the Kingsport-Bristol-Bristol, Tennessee-Virginia Metropolitan Statistical Area and is a Department of Housing and Urban Development Community Development Block Grant Entitlement City. As such, Kingsport receives a formulated amount of funds annually. The CDBG program is authorized under Title 1 of the Housing and Community Development Act of 1974, Public Law 93-383, as amended; 42 U.S.C.-5301 et seq. This year Kingsport expects to receive \$439,914 in Community Development Block Grant (CDBG) funds. In the unexpected event that the entitlement amounts should increase prior to July 1, 2021, the added amount of CDBG funds will be allocated to housing rehabilitation. If the entitlement amounts should decrease, the reduction will be subtracted from housing rehabilitation.

The projected use of funds has been developed to give maximum priority to activities that will carry out one of the national objectives as follows:

1. Benefit low- and moderate-income (LMI) families.
2. Aid in the prevention or elimination of slums or blight.
3. Other community development areas which demonstrate a particular urgent need or because existing conditions pose a serious and immediate threat to the health or welfare of the community and where other financial resources are not available to meet such needs.

The City of Kingsport, Tennessee certifies that the following activities proposed for the coming year meet one of the three above-listed national objectives.

**REVENUE:**

2020-21 CDBG Allocation: \$446,397.00

CDBG Projected Program Income: \$2,000

2020 Kingsport CDBG Carryover: Approx. \$51,080

2019 Kingsport CDBG Carryover: Approx. \$7,900

2018 Kingsport CDBG Carryover: Approx. \$5,407

2017 Kingsport CDBG Carryover: Approx. \$17,524

**EXPENSES:**

Kingsport CDBG Projects:

-Rehabilitation/Emergency Repair: **\$156,807**

2021 Annual Allocation \$131,914 (\$101,914 Homeowner Grants + \$30,000 Rehab Admin)

2019 Kingsport Carryover: Approx. \$22,893 in carryover (Homeowner Grants)

\$2,000 in Program Income

-Demolition (Safe, Decent Housing): **\$81,080**

2021 Annual Allocation - \$41,080

2020 Kingsport CDBG Carryover: Approx. \$40,000

-Community Enrichment (Public Service): **\$66,500**

-Neighborhood Improvement (Public Facilities): **\$40,831**

2020 Kingsport CDBG Carryover: Approx. \$10,000

2019 Kingsport CDBG Carryover: Approx. \$7,900

2018 Kingsport CDBG Carryover: Approx. \$5,407

2017 Kingsport CDBG Carryover: Approx. \$17,524

-Program Administration: **\$87,983**

-Code Enforcement: **\$50,000**

-Section 108 Loan: **\$70,000**

## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives - 91.420, 91.220(c)(3)&(e)

#### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Decent, Safe and Affordable Housing	2020	2024	Affordable Housing		Decent, Safe and Affordable Housing	CDBG: \$156,807	Homeowner Housing Rehabilitated: 20 Household Housing Unit
2	Public Services	2020	2024	Non-Housing Community Development		Public Services	CDBG: \$66,500	Public service activities other than Low/Moderate Income Housing Benefit: 300 Persons Assisted Homeless Person Overnight Shelter: 25 Persons Assisted Overnight/Emergency Shelter/Transitional Housing Beds added: 25 Beds Homelessness Prevention: 150 Persons Assisted
3	Public Facilities	2020	2024	Non-Housing Community Development		Public Facilities	CDBG: \$43,459	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 500 Persons Assisted
4	Decent, Safe, Affordable Housing	2020	2024	Affordable Housing Non-Housing Community Development		Decent, Safe and Affordable Housing	CDBG: \$80,010	Buildings Demolished: 3 Buildings

Table 6 – Goals Summary

## Goal Descriptions

1	<b>Goal Name</b>	Decent, Safe and Affordable Housing
	<b>Goal Description</b>	<p>Housing rehab continues to be a need in Kingsport, especially for the low-moderate income households. Due to the older housing stock combined with low income homeowners, there is a great need for repairs ranging from emergency repairs to substantial rehab. We will use a large amount of our CDBG funds for this purpose. We plan to partner with the Kingsport Housing and Redevelopment Authority, Carpenter's Helpers, Appalachia Service Project, and other housing providers in order to provide the maximum assistance possible to these homeowners. Funding also includes program carryover from the Past Year (PY).</p> <p>CDBG Funds will also be allocated to Code Enforcement efforts, "city-wide", in order to maintain decent, safe and affordable housing in Kingsport.</p>
2	<b>Goal Name</b>	Public Services
	<b>Goal Description</b>	<p>\$25,000 of CDBG Public Service funding is allocated to the United Way for a Homeless Services Liaison. The Homeless Service Liaison provide direct assistance to those who are at-risk or experiencing homelessness. \$41,500 of CDBG Public Service/Community Enrichment funds will be made available to local public service agencies who will serve for low-income individuals and families in the City of Kingsport. Funds are subject to 15% cap for Public Service activities.</p>
3	<b>Goal Name</b>	Public Facilities
	<b>Goal Description</b>	<p>CDBG will provide funding to support the Neighborhood &amp; Public Facility Improvement Projects in an effort to revitalize and improve the safety and well-being of the community.</p>



4	<b>Goal Name</b>	Decent, Safe, Affordable Housing
	<b>Goal Description</b>	One of the elements of the Kingsport Alliance for Housing Revitalization (KAHR) program is the identification and acquisition of dilapidated, vacant housing. The KAHR program works with the City's office of Code Enforcement and local community based organizations in the identification of housing that poses nuisances to neighborhoods by being severely deteriorated, dilapidated and/or chronically vacant.

DRAFT

## AP-35 Projects - 91.420, 91.220(d)

### Introduction

The projects the City chose to fund this year were the direct result of citizen input, CDAC recommendations, and basic needs of the community. Through the public hearing/meetings process, public facility improvements, homeless services, enrichment programs, housing rehabilitation, emergency housing repairs and other issues dealing with housing were the highest priorities. The age of housing, the high number of low-income homeowners, and the general low-income population has caused many houses to deteriorate due to lack of private funds to meet the needs. Homeowners many times are forced to live without adequate heating, unsafe wiring, and other unsafe living conditions. CDBG funds will address many of these issues.

#	Project Name
1	CDBG Program Administration
2	Section 108 Loan/HOPE IV
3	Code Enforcement
4	KAHR - Home Repair Program
6	Neighborhood Improvement Projects
7	Community Enrichment Programs
8	KAHR - Demolition

Table 7 – Project Information

**Describe the reasons for allocation priorities and any obstacles to addressing underserved needs**

**AP-38 Project Summary**  
**Project Summary Information**

DRAFT

1	<b>Project Name</b>	CDBG Program Administration
	<b>Target Area</b>	
	<b>Goals Supported</b>	Decent, Safe and Affordable Housing Decent, Safe, Affordable Housing Public Services Public Facilities
	<b>Needs Addressed</b>	Decent, Safe and Affordable Housing Public Facilities Public Services
	<b>Funding</b>	CDBG: \$87,983
	<b>Description</b>	20% of the total CDBG funds are allocated for Administrative cost for City of Kingsport for the 2021-2022 program year. Program Administration: \$83,000
	<b>Target Date</b>	6/30/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Funds will be used to administer the Kingsport, TN CDBG program
	<b>Location Description</b>	City of Kingsport, Tennessee
	<b>Planned Activities</b>	Funds will be used to administer the Kingsport TN CDBG program. Single-family emergency home repair/minor rehab, public service projects, and public facilities projects. Funds are subject to 20% admin cap of the annual allocation
2	<b>Project Name</b>	Section 108 Loan/HOPE IV
	<b>Target Area</b>	
	<b>Goals Supported</b>	Decent, Safe and Affordable Housing
	<b>Needs Addressed</b>	Decent, Safe and Affordable Housing
	<b>Funding</b>	CDBG: \$70,000
	<b>Description</b>	Installment for 108 loan supporting the 2008 HOPE VI project. Section 108 Loan: \$70,000
	<b>Target Date</b>	6/30/2022

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	Section 108 Loan Installment
<b>3</b>	<b>Project Name</b>	Code Enforcement
	<b>Target Area</b>	
	<b>Goals Supported</b>	Decent, Safe and Affordable Housing
	<b>Needs Addressed</b>	Decent, Safe and Affordable Housing
	<b>Funding</b>	CDBG: \$50,000
	<b>Description</b>	Code enforcement for low and moderate income housing in the city. Code Enforcement: \$50,000
	<b>Target Date</b>	6/30/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	City of Kingsport, TN
	<b>Planned Activities</b>	Code Enforcement Inspections
<b>4</b>	<b>Project Name</b>	KAHR - Home Repair Program
	<b>Target Area</b>	
	<b>Goals Supported</b>	Decent, Safe and Affordable Housing
	<b>Needs Addressed</b>	Decent, Safe and Affordable Housing
	<b>Funding</b>	CDBG: \$156,807
	<b>Description</b>	-Rehabilitation/Emergency Repair: \$233,4872021 Annual Allocation \$133,914 (\$101,914 Homeowner Grants + \$30,000 Rehab Admin)2020 Kingsport Carryover: Approx. \$78,680 in carryover (Homeowner Grants)2019 Kingsport Carryover: Approx. \$22,893 in carryover (Homeowner Grants) \$2,000 in Program Income
	<b>Target Date</b>	6/30/2022

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	We estimate that 20 LMI households will benefit from this project.
	<b>Location Description</b>	City of Kingsport, TN
	<b>Planned Activities</b>	Planned activities include home repair for LMI households.
5	<b>Project Name</b>	Neighborhood Improvement Projects
	<b>Target Area</b>	
	<b>Goals Supported</b>	Public Facilities
	<b>Needs Addressed</b>	Public Facilities
	<b>Funding</b>	CDBG: \$40,831
	<b>Description</b>	CDBG will provide funding to support the Neighborhood & Public Facility Improvement Projects in an effort to revitalize and improve the safety and wellbeing of the community. With focus in the Lynn Garden Community, planned activities include forming a Neighborhood Improvement Group in which the group will develop and implement plans to improve the community. Activities will include neighborhood cleanup, crime watch, etc. Funding may also be used for other public facility improvements throughout the city in LMI areas. Special preference, but no obligation to, will be placed on those activities to improve access for individuals with special needs. \$10,000.00 in carryover.
	<b>Target Date</b>	6/30/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	We estimate that approximately 500 LMI families will benefit from this project.
	<b>Location Description</b>	Funding may used City-Wide in LMI area of the City.

	<b>Planned Activities</b>	<p>CDBG will provide funding to support the Neighborhood &amp; Public Facility Improvement Projects in an effort to revitalize and improve the safety and wellbeing of the community.</p> <p>With focus in the Lynn Garden Community, planned activities include forming a Neighborhood Improvement Group in which the group will develop and implement plans to improve the community. Activities will include neighborhood cleanup, crime watch, etc.</p> <p>Funding may also be used for other public facility improvements throughout the city in LMI areas. Special preference will be placed on those activities to improve access for individuals with special needs.</p>
6	<b>Project Name</b>	Community Enrichment Programs
	<b>Target Area</b>	
	<b>Goals Supported</b>	Public Services
	<b>Needs Addressed</b>	Public Services
	<b>Funding</b>	CDBG: \$66,500
	<b>Description</b>	The City of Kingsport will provide funding to local non-profit organizations which address the educational, advocacy, employment, health, safety and economic opportunity needs of extremely-low, low and moderate income persons and families and subgroups within in the City of Kingsport. Funding will included a \$25,000 allocation for a Homeless Services Liaison will provide a variety of services that directly benefit individuals and families at-risk or experiencing homelessness. \$40,000 shall be allocated to non-profit social service programs which serve LMI individuals in the City of Kingsport.
	<b>Target Date</b>	6/30/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	We estimate that approx. 500 LMI individuals benefit from Community Enrichment Program.
	<b>Location Description</b>	City-Wide, City of Kingsport, TN
	<b>Planned Activities</b>	The City of Kingsport will advertise funding availability to the public for Community Enrichment Programs. The Community Development Advisory Committee will review proposals and award the highest scoring non-profit organizations to serve the needs of LMI persons in the City.
	<b>Project Name</b>	KAHR - Demolition

7	<b>Target Area</b>	
	<b>Goals Supported</b>	Decent, Safe, Affordable Housing
	<b>Needs Addressed</b>	Decent, Safe and Affordable Housing
	<b>Funding</b>	CDBG: \$80,000
	<b>Description</b>	One of the elements of the Kingsport Alliance for Housing Revitalization (KAHR) program is the identification and acquisition of dilapidated, vacant housing. The KAHR program works with the City's office of Code Enforcement in the identification of housing that poses nuisances to neighborhoods by being severely deteriorated, dilapidated and/or chronically vacant. Demolition (Safe, Decent Housing): \$80,000 \$40,000.00 allocation \$40,000.00 in carryover
	<b>Target Date</b>	6/30/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	Kingsport, Tennessee - City-Wide
	<b>Planned Activities</b>	One of the elements of the Kingsport Alliance for Housing Revitalization (KAHR) program is the identification and acquisition of dilapidated, vacant housing. The KAHR program works with the City's office of Code Enforcement in the identification of housing that poses nuisances to neighborhoods by being severely deteriorated, dilapidated and/or chronically vacant. The City of Kingsport will partner with a local community based organization to carry out this project.



## **AP-50 Geographic Distribution - 91.420, 91.220(f)**

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

Most CDBG funds are not planned based on allocations to specific geographic areas within the City.

Housing rehabilitation funds are offered on a city-wide basis, with a “first come-first served” priority.

Demolition funds are not planned for specific areas of city, however, our focus is improving low-moderate income areas of City.

Public Facility improvement funds will focus on the Lynn Garden Community and other low-moderate income areas of the City.

The funds for community services are spread across the city. However, funds are awarded based on the strength of the program(s) and its impacts, and not prioritized based on geographic factors.

### **Geographic Distribution**

<b>Target Area</b>	<b>Percentage of Funds</b>

**Table 8 - Geographic Distribution**

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

Housing needs and public services will be addressed citywide because of the nature of the projects themselves. They will serve income-eligible persons with the greatest need.

CDBG funds that assist with demolition and public facilities will prioritize allocating funding in the low-moderate income areas of the City.

### **Discussion**

In years past, the City of Kingsport undertook its CDBG program in certain qualified target areas in the City. Several neighborhoods were transformed as a result. These include Highland, Old Kingsport, Rotherwood Heights, Gibsontown and other smaller areas. As funding has decreased over the years, it has become increasingly difficult to allocate funds in target areas with significant impact. This has driven the City to offer funding to public service agencies and housing rehabilitation clients on a city-wide basis.

The City of Kingsport along with Kingsport Housing and Redevelopment Authority have identified the following Redevelopment Districts: Downtown, Stonegate, Crown Point, Kingsport Mall District, East

Stone Commons and Riverwalk.

DRAFT

DRAFT

## **AP-75 Barriers to affordable housing -91.420, 91.220(j)**

### **Introduction**

Kingsport, Tennessee CDBG funds will be used to provide emergency repair/minor rehab 20 (20) single-family units.

The process for soliciting & funding applications is generally on a first come first served basis, unless the need is urgent. Homeowners who apply for this assistance do so voluntarily and with the understanding that they are not being displaced under HUD's Acquisition, Relocation and Displacement Policy. They may be required to find alternative housing during the time period of the rehabilitation project. In some cases, a rehab project may not include the disturbance of lead paint surfaces; however, the City may still deem it in the best interests of the homeowner to find alternative housing with a family member or friend in order that the contractor may expedite the project. This program does not fund the expense of temporary housing for each family.

As a city, Kingsport, has discovered there is a definite correlation between the rising cost of land, building materials and development costs as it relates to the lack of affordable housing in the Consortium area. All three of these factors have had a hand in driving up the cost of housing in the Consortium area putting it out of reach to the vast majority of low and moderate-income households. The Consortium members administer a number of ordinances and regulations that may in some ways be considered obstacles to affordable housing; however, each represents an integral part of administration for the greater good of the community.

The following regulations, codes and policies were examined and determined necessary elements for city-wide planning for public safety and

welfare. However, as noted each incorporates some degree of impediments to affordable housing:

1. Zoning Regulations
2. Subdivision Regulations
3. New Home Construction Codes
4. Unsafe Building Abatement Code
5. Property Taxes - City and County
6. Utility Board Restrictions
7. Southern Building Codes/BOCA
8. Code Enforcement
9. Unfunded Mandates
10. Poor Credit History
11. Inadequate Paying Jobs.

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

## **policies affecting the return on residential investment**

Efforts to remove barriers to affordable housing include the following:

- Continuation of the Fair Housing Program to assure that every citizen has equal access to housing opportunities. Fair Housing Resolutions will be adopted declaring April Fair Housing Month.
- Land Use Controls - Planning Commissions will continue working to implement land-use controls that promote housing development in a safe, efficient manner that is harmonious with existing neighborhoods.
- Zoning Ordinance - Board of Zoning Appeals shall monitor requests for zoning variances due to hardships imposed by specific zoning regulations to determine if existing regulations are unreasonable.
- Building Codes - Continue to monitor the International Building Code and BOCA for changes in restrictions which might be extraordinary and potentially unreasonable.
- Infrastructure Requirements - The Planning and Engineering Departments will scrutinize the impact of infrastructure costs, along with utility fees and subdivision design requirements on the provision of affordable housing.

### **Discussion**

The City of Kingsport follows the State of Tennessee Fair Housing Ordinance in adjudicating fair housing issues and receives services from the East Tennessee Legal Services agency and the Knoxville and Richmond area HUD offices to address the most serious fair housing issues.

The City of Kingsport has previously adopted a Fair Housing Ordinance that prohibits discrimination in housing practices and incorporates provisions of the Civil Rights Act of 1964, the Fair Housing Act of 1968 and the Fair Housing Amendments Act of 1988. The documents include

protection for all citizens regardless of race, color, sex, religion, national origin, disability or familial status.

Presently, there are no private organizations in the community that address fair housing issues or provide fair housing services. Most agencies within the area tend to provide little more than referral services.

The City of Kingsport, under the HUD program guidelines provides informational programs to the public through printed material, public notices and local media advertising. The local Board of Realtors, as well as the Mortgage Bankers Association, also provides written materials to the public and to their housing clients.

The First Tennessee Development District also provides informational programs to area realtors, lenders and appraisers in order to better educate our partners with regards to fair housing practices for Kingsport residents.

Public awareness and education of Fair Housing Laws are a continuing activity. These activities include interviews with the media, distribution of informational brochures, display of Fair Housing posters and publication of information and advertisements to make the general public more aware of Fair Housing issues.

Legal Aid of East Tennessee (LAET) is the agency to which the majority of discrimination claims are directed. They report that the greatest number of discriminatory practices involve race and familial status (women with children). Statistical information regarding number of complaints received and their resolution is available from Legal Aid of East Tennessee. LAET has conducted training sessions with landlords and key housing providers and their staff (housing authorities), as well as with tenants, reviewing the Landlord Tenant Act. Regular Fair Housing Act outreach to voucher recipients at Kingsport Housing & Redevelopment Authority is conducted.

Voucher landlords in Kingsport have been trained on the Fair Housing Act as have the staff members. Additionally. Special efforts at outreach regarding the Fair Housing Act have been made to the HOPE VI tenants in Kingsport with the assistance of the Central Baptist Church.

Through these educational programs and services, we are striving to provide information to any who feel they may be experiencing discrimination, whether it be the disabled, the elderly, or those in any of the fair housing protected classes of people

## **AP-85 Other Actions - 91.420, 91.220(k)**

### **Introduction**

This section discusses other actions to be addressed by the Community Development office of the City of Kingsport.

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

The City of Kingsport has previously adopted a Fair Housing Ordinance that prohibits discrimination in housing practices and incorporates provisions of the Civil Rights Act of 1964, the Fair Housing Act of 1968 and the Fair Housing Amendments Act of 1988. The documents include protection for all citizens regardless of race, color, sex, religion, national origin, disability or familial status. The distribution of the "Fair Housing, It's Your Right" occurs with contacts with CDBG and other program beneficiaries.

Fair Housing complaints are received and attended by the Community Development office of the City. As inquiries and complaints are received, they are reviewed and, as appropriate, either forwarded to the Fair Housing office of HUD, the Tennessee Human Rights Commission, or to Legal Services of Upper East Tennessee office which provides fair housing advocacy and counseling.

Community Development also provides the locally produced "About Renting" booklet which provides valuable information regarding fair housing rights and remedies. City Community Development staff participates with the Legal Services of Upper East Tennessee staff in providing fair housing training to the staff of the Kingsport Housing and Redevelopment Authority. KHRA staff are traditional points of contact with populations identified as particularly prone to fair housing concerns.

Community Development staff also provide Fair Housing information to the Kingsport Ministerial Alliance who are also points of contact with persons who tend to have some fair housing issues.

The City will be attempting to strengthen and/or expand its cooperative relationship with local agencies. While previous outreach resulted in awareness of new programs and consideration of funding, Community Development hopes to continue development of a better coordinated approach and build on this new relationship as a vehicle to raise awareness of minority needs in the community at large.

Community Development staff has been working with City Planning staff to ensure inclusion of non-discrimination and Fair Housing rights language in various communications the City Planning Department staff produce and distribute to citizens during development proposals. Staff believes that development projects generate a heightened awareness among affected citizenry and these would be



excellent times to communicate discrimination and Fair Housing rights.

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

The City of Kingsport continues to offer rehabilitation and emergency repair to low and moderate income home-owners in the City on a city-wide basis. The City believes this program not only provides decent, safer and more accessible housing for those families and individuals in need, but overall helps maintain an affordable housing stock for the city. The City of Kingsport will continue to work with our Kingsport Housing and Redevelopment Authority in providing affordable housing opportunities to low-moderate income citizens of Kingsport.

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

Housing rehabilitation programs and modernization of public housing units by the Kingsport Housing and Redevelopment Authority will continue to abate lead-based paint as it is encountered. Each unit rehabilitated by the City will be assessed for existing and potential lead-based paint hazards, which will be abated. All households receiving home repair assistance will receive "Lead Based Paint" information booklet. The number of units targeted for rehabilitation or emergency repair is 20.

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

Employment opportunities are the key to reducing the number of households living in poverty. Many times a lack of education and/or skills training for many adults limit their employment potential. Improving the economy within the Consortium area is an essential element in the anti-poverty strategy. Kingsport's Economic Development Task Force, Bristol, Tennessee's Industrial Development Board, Bristol, Virginia's Economic Development Committee, and Johnson City's Economic Development Board all are working to increase opportunities for families living in poverty.

In June 2004, the Sullivan County Economic Development Partnership was formed. It is composed of the cities of Bluff City, Bristol, Kingsport and Sullivan County, Tennessee. The Partnership is a governmental entity that consolidates the economic development program for all of Sullivan County. This entity is charged to establish, coordinate and implement a comprehensive economic development agency whose purpose is to develop and implement an overall economic development strategic plan. The Partnership seeks to stimulate development in new manufacturing and services, existing businesses, retail destinations/venues, small business and startups and support hospitality and tourism.

Objectives used to meet this goal involve the use of federal funds for homeownership assistance, rehabilitation of housing, infrastructure improvement, utility tap fees and PSAs to educate the general public about fair housing choice. Efforts will be coordinated with the local Housing Authorities Comprehensive Grant programs to provide rental units for low-income elderly, handicapped and

families.

Community Development staff will continue to work with the City of Kingsport Planning and Economic Development Departments to increase economic development and opportunity for low-moderate income citizens of Kingsport.

### **Actions planned to develop institutional structure**

There are no proposals to change the existing Institutional Structure. The Kingsport Housing and Redevelopment Authority is not considered a “troubled” public housing agency and most of the other public and social service agencies in the Kingsport area are very well organized and strong. Actions to improve the structure will be taken, as they become apparent.

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

The City has a tradition of supporting Public Service agencies with Federal and local funding. In 2021/2022, Community Development proposes to fund agencies which perform Public Service functions which serve low and moderate income persons in the City. The maximum amount available for Public Service funding is \$38,000 to be distributed to local non-profit agencies who apply for funding and meet funding criteria. Community Development will continue to support the United Way Homeless efforts by providing \$25,000 to for a homeless liaison, who provides direct service and referrals to those experiencing or at-risk for homelessness in the City of Kingsport. The Community Development office has received applications from four agencies. The activities proposed by all agencies meet basic eligibility criteria under CDBG regulations. However, the specific requests will be further reviewed and evaluated by the Community Development Advisory Committee for performance and community needs assessment, presented to the Board of Mayor and Aldermen for review and approval for final allocation assignments.

HOPE VI – For Program Year 2021, the City proposes to set aside \$70,000 for payment of annual installments for a Section 108 Loan in support of the HOPE VI Riverview/Sherwood/Hiwasee Improvement project. The City received approval for \$856,000 Section 108 Loan funds to provide support assistance in the Riverview and Sherwood/Hiwasee neighborhoods as part of the HOPE VI project. Section 108 requires that the local jurisdiction utilize its current and future CDBG funds as collateral for the loan. HUD has calculated that the City would need to set aside approximately \$70,000 CDBG funds per year for 20 years to support this proposal.

### **Discussion**

While the City of Kingsport is a regional leader in economic development strategies, the Community

Development Block Grant program is not regularly utilized for these efforts.

DRAFT

## Program Specific Requirements

### AP-90 Program Specific Requirements - 91.420, 91.220(I)(1,2,4)

#### Introduction

#### Community Development Block Grant Program (CDBG)

##### Reference 24 CFR 91.220(I)(1)

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

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

#### Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	75.00%

## Discussion

DRAFT

DRAFT