



Knox County's 2015
**Consolidated Annual Performance and
Evaluation Report (CAPER)**

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CR-05 - Goals and Outcomes

Progress the jurisdiction has made in carrying out its strategic plan and its action plan. 91.520(a)

As a Participating Jurisdiction (PJ) and an Entitlement community, Knox County receives annual funding allocations from the U.S. Department of Housing and Urban Development (HUD) to fund priorities that are addressed in the five-year Consolidated Plan (Con Plan). The Con Plan establishes a unified, coordinated vision for community development actions for the upcoming five years using Community Development Block Grant (CDBG) and HOME Investment Partnerships (HOME) Federal funds. Knox County's primary focus for the CDBG funds is on affordable and improved housing for low-to-moderate income populations, enhancing both public housing as well as single-family housing. Additionally, Knox County uses up to 15 percent of its allocation for public service projects to address medical, mental health, dental, homelessness prevention, and special needs. Funds are directed toward the primary objective of the provision of services to assist individuals with the greatest needs and whose resources are very limited. Agencies annually selected for the County's HUD allocations are dedicated to serving the community with service provisions in some cases that result in providing basic and essential needs addressing core life issues.

As a recipient of CDBG and HOME funding, Knox County is required to submit to HUD each year the Consolidated Annual Performance and Evaluation Report (CAPER) which provides detailed information to the public, HUD, and members of Congress of the progress made and accomplishments of the programs, projects and activities carried out during the program year with those funds. Highlights of performance accomplishments according to specific need categories include:

Housing - Assisted **249** households through Catholic Charities of East Tennessee, Knox County Sustainable Housing/Home Repair Program (CAC), Knoxville's Community Development Corporation (KCDC), Neighborhood Housing Inc. (NHI) – Operation Backyard, Sertoma Center, Inc. (Wilderness Road), and HomeSource east tennessee (Countryside Lane).

Homelessness - Assisted **5,941** homeless and indigent individuals through supportive programs including the Public Defender – Community Law Office, Volunteer Ministry Center Dental Clinic, and The University of Tennessee Homeless Management Information System (HMIS).

Public Services - Assisted **2,353** low-income persons with medical and case management services and training through organizations like Breakthrough Corporation (autism), Helen Ross McNabb Center – Indigent Mental Health Services, HomeSource east tennessee (senior care coordinator), the Knoxville Academy of Medicine – Project Access, Senior Citizens Home Assistance Service (caregiver training), and the Volunteer Ministry Center Bush Family Refuge (homelessness prevention).

Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Expand Affordable Housing Opportunities	Affordable Housing	CDBG: \$0 HOME: \$0	Rental units constructed	Household Housing Unit	0	0		0	0	
Expand Affordable Housing Opportunities	Affordable Housing	CDBG: \$118,963 HOME: \$267,000	Rental units rehabilitated	Household Housing Unit	450	97	21.56%	97	97	100.00%
Expand Affordable Housing Opportunities	Affordable Housing	CDBG: \$443,750 HOME: \$0	Homeowner Housing Rehabilitated	Household Housing Unit	465	109	23.44%	93	109	117.20%
Expand Affordable Housing Opportunities	Affordable Housing	CDBG: \$28,000 HOME: \$0	Homelessness Prevention	Persons Assisted	140	38	27.14%	28	38	135.71%
Expand Public Services Offerings	Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$130,996	Public Service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	47,000	8,294	17.65%	9,500	8,294	87.31%

Table 1 - Accomplishments – Program Year & Strategic Plan to Date

Assess how the jurisdiction's use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan, giving special attention to the highest priority activities identified.

The Consolidated Plan identified public services and decent, safe, affordable housing as two very high priority concerns. The County provides essential services to low-and-moderate income people through organizations such as Breakthrough Corporation, Helen Ross McNabb Center, Senior Citizens Home Assistance Service, and the Volunteer Ministry Center. Quality, affordable housing is also a high priority and Knox County addressed housing through the Knoxville/Knox County Community Action Committee Sustainable Housing Program, Neighborhood Housing Inc. Minor Home Repair Program, and Knoxville's Community Development Corporation rehab of multi-family rental housing. The agencies listed above provide essential public services or housing for low-and-moderate income persons and families.

Knox County assisted 8,537 people and households during program year 2015 with CDBG funds for homeowner rehabilitation, rental unit rehabilitation, and public service programs that address health, case management, homelessness, and homelessness prevention. The numbers in Table I above indicate homeowner and rental rehabilitation and are not inclusive of our HOME funds that were allocated to our Community Housing Development Organization (CHDO) for the acquisition of two apartment buildings (Countryside Lane) with 4 units in each building. Six of the units are occupied by income qualified people who are at or below 50% of the median family income levels.

As mentioned previously, 5,941 homeless and indigent individuals and 2,353 people and families were assisted through supportive public service programs. Our housing programs (including HOME), provided 249 households with homeowner rehabilitation, rental rehabilitation, and rental acquisition for the needed repairs and assistance.

Volunteer Ministry Center Proposed vs Actual

The Volunteer Ministry Center Dental Clinic (VMC) offers dental services two days per week from 8:00 a.m. until noon through volunteer dentists at no charge for homeless and poor persons. During the 2015 program year, one dentist was unable to work from December through the middle of May due to surgery. Unfortunately, staffing affected the number of clients that the remaining volunteer dentist was able to serve and the Clinic completed the year at 63% of the program goal. VMC is currently focused on hiring a full-time dentist to work one-day per week in addition to two volunteer dentists to handle the waiting list of 1,000 people.

Knoxville Academy of Medicine Proposed vs Actual

The Knoxville Academy of Medicine's Knox Area Project Access (KAPA) is a community health partnership that creates and coordinates access to medical care for low-income, uninsured Knox County residents. KAPA provides patients with access to donated medical care including primary care, specialty care, hospital inpatient care, outpatient care, ancillary services, psychiatric care, and pharmacy support.

KAPA coordinates the donated medical care through a volunteer network of over 1,200 physicians, providers, and Knox area hospitals.

KAPA offers an open enrollment period from November through January each year and they are now finding that people who previously qualified for assistance now fall under "Health Insurance Marketplace" insurance. This has severely impacted KAPA's numbers and during program year 2015, medical assistance was provided to 1,123 uninsured people which was only 75% of their goal. The program director has indicated that they are continually enhancing marketing efforts to reach out to people that "fall through the cracks" to ensure that medical services are available to anyone in need.

HomeSource east tennessee Proposed vs Actual

The HomeSource east tennessee Senior Care Coordinator program serves the seniors at three complexes: Riverbirch Village, Willow Place, and Blueberry Ridge and was established to help seniors live independently. The Care Coordinator schedules events, organizes transportation, and researches senior services in addition to providing limited case management/counseling services. The objective of this program is to help seniors remain in their apartment (housing) for as long as possible. The Care Coordinator worked with the residents to establish rapport and gain their trust and by mid-point in the program year, the residents were beginning to join in scheduled activities, asking questions about services and were becoming more comfortable with the program. By year-end the Care Coordinator had met 82% of program goals.

CR-10 - Racial and Ethnic composition of families assisted

Describe the families assisted (including the racial and ethnic status of families assisted).

91.520(a)

	CDBG	HOME
White	6,098	2
Black or African American	2,252	4
Asian	70	0
American Indian or American Native	111	0
Native Hawaiian or Other Pacific Islander	7	0
Total	8,538	6
Hispanic	401	0
Not Hispanic	8,137	6

Table 2 – Table of assistance to racial and ethnic populations by source of funds

Please see attached table with a comprehensive breakdown of racial and ethnic status.

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Source of Funds	Resources Made Available	Amount Expended During Program Year
CDBG	\$1,018,797	\$942,579
HOME	\$300,486	\$292,492

Table 3 - Resources Made Available

Identify the geographic distribution and location of investments

There are two low-income census tracts in Knox County that are classified as “pockets of poverty”. Tract 004610 is in the western portion of the County bordering the City of Knoxville with 62.06% LMI households and Tract 006208 is in the north portion of the County bordering the City of Knoxville near Brown Gap Road with 59.02% LMI Households. This Tract includes a portion of the unincorporated area of Halls Crossroads. Though both public services and housing are provided county-wide to individuals that meet the low-to-moderate income qualifications as determined by HUD, the County will make an effort to concentrate on the two census tracts most impacted by poverty and lack of resources, when feasible. The priorities selected to focus upon are dependent upon citizen participation, public comments and annual applications submitted to Knox County by agencies serving in both public service and housing delivery.

While there is obviously a desire for strategic action where the poverty rate increased from 12.6% in 2000 to 16.0% in 2013, the limited resources force the County to make decisions among sectoral and geographic needs. Limited resources are allocated during an annual application process aimed toward stakeholders and potential subrecipients who will be able to address the priorities established by Knox County. During the 2015 program year, the County, through the Knoxville/Knox County Community Action Committee Sustainable Housing Program and Neighborhood Housing Inc. Operation Backyard, completed eight minor owner-occupied housing rehabilitations in the unincorporated area of Halls Crossroads near Brown Gap Road.

Explain how federal funds leveraged additional resources (private, state and local funds), including a description of how matching requirements were satisfied, as well as how any publicly owned land or property located within the jurisdiction that were used to address the needs identified in the plan.

Knox County shares HUD’s goals of using leveraged resources including private, state, and local funds. Unfortunately, over the past several years additional resources for most activities eligible for the Consolidated Plan funding were decreased in order to reduce deficits. Private resources are affected by reductions in corporate, foundation, and individual giving to most all non-profit entities. As a result, it is virtually impossible for many organizations that address the priority needs established in the

Consolidated Plan to survive without the assistance of the CDBG and HOME program funds.

The Knoxville/Knox County Community Action Committee Sustainable Housing Program leveraged local funds in the amount of \$1,975 to address the needs of owner-occupied households in the County.

Neighborhood Housing Inc. (NHI) - Operation Backyard provided free home repair services to low-income elderly, disabled and veteran homeowners. Their program used \$25,000 in CDBG funding and partnered with volunteers to provide over \$22,930 (2,293 hours) in both skilled and unskilled labor for eighteen homeowners in Knox County. Projects included replacing roofs, installing accessibility features, and wheelchair ramps.

MATCH

The County had HOME project expenditures for PY 2015 of \$267,000 requiring a match liability of \$66,750. Based on the match carried over from last year of \$1,712,712.55 and no additional match contribution to be added by the County, the new total excess match amount to be carried over to the next federal fiscal year is **\$1,645,962.55**.

HOME MBE/WBE

Knox County did not have HOME contracts or expenditures with Minority Business Enterprises or Women Business Enterprises during the 2015 program year as all of our available HOME funds were allocated to our only Community Housing Development Organization (CHDO) for the acquisition of two apartment buildings (Countryside Lane) with 4 units in each building. Six of the units are occupied by income-qualified people who are at or below 50% of the median family income levels.

PROGRAM INCOME

Knox County received HOME Program Income in the amount of \$ 6,710.23 during the program year.

Fiscal Year Summary – HOME Match	
1. Excess match from prior Federal fiscal year	\$1,712,713
2. Match contributed during current Federal fiscal year	0
3. Total match available for current Federal fiscal year (Line 1 plus Line 2)	\$1,712,713
4. Match liability for current Federal fiscal year	\$66,750
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	\$1,645,963

Table 4 – Fiscal Year Summary - HOME Match Report

HOME MBE/WBE report

Program Income – Enter the program amounts for the reporting period				
Balance on hand at beginning of reporting period	Amount received during reporting period	Total amount expended during reporting period	Amount expended for TBRA	Balance on hand at end of reporting period
\$1,306	\$6,710	\$2,823	\$0	\$5,193

Table 5 – Program Income

Table 6 – Minority Business and Women Business Enterprises

Relocation and Real Property Acquisition – Indicate the number of persons displaced, the cost of relocation payments, the number of parcels acquired, and the cost of acquisition						
Parcels Acquired		2	\$267,000			
Businesses Displaced		0	0			
Nonprofit Organizations Displaced		0	0			
Households Temporarily Relocated, not Displaced		0	0			
Households Displaced	Total	Minority Property Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0	0	0	0	0	0
Cost	0	0	0	0	0	0

Table 7 – Relocation and Real Property Acquisition

CR-20 - Affordable Housing 91.520(b)

Evaluation of the jurisdiction's progress in providing affordable housing, including the number and types of families served, the number of extremely low-income, low-income, moderate-income, and middle-income persons served.

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	28	38
Number of Non-Homeless households to be provided affordable housing units	188	204
Number of Special-Needs households to be provided affordable housing units	3	2
Total	219	244

Table 8 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	0	0
Number of households supported through The Production of New Units	0	0
Number of households supported through Rehab of Existing Units	219	244
Number of households supported through Acquisition of Existing Units	4	6
Total	223	250

Table 9 – Number of Households Supported

Discuss the difference between goals and outcomes and problems encountered in meeting these goals.

Knox County had a One-Year Goal to assist 219 people with affordable housing and the goal was exceeded 111% by providing 243 people with housing rehab which includes multi-family housing to prevent homelessness (Catholic Charities – Samaritan Place), multi-family housing for people with special needs (Sertoma Center – Wilderness Lane), public housing (KCDC), and rehab of owner-occupied, single-family housing through CAC Sustainable Housing and NHI – Operation Backyard.

In addition to the above, the County was able to exceed the acquisition of existing housing goal by 200% when two buildings containing four units of multi-family rental housing were acquired using 2015 HOME CHDO funds. The total of all housing acquired or rehabbed was 249 units or 112% of the proposed goal of 223 units.

Discuss how these outcomes will impact future annual action plans.

The County does not anticipate any impact on these outcomes with future annual action plans. Our CDBG funds will continue to provide affordable single-family owner rehab, multi-family rental rehab, permanent supportive housing rehab, and the rehab of housing for homeless seniors.

We had anticipated losing our HOME funds after 2015 due to the funding allocation being less than \$500,000 however, that decision has not been made and future allocations will provide acquisition of multi-family rental housing through our only designated CHDO. It is unknown at this time how long the County will continue to receive HOME funding.

Include the number of extremely low-income, low-income, and moderate-income persons served by each activity where information on income by family size is required to determine the eligibility of the activity.

Number of Persons Served	CDBG Actual	HOME Actual
Extremely Low-income	7,755	3
Low-income	569	3
Moderate-income	213	0
Total	8,537	6

Table 10 – Number of Persons Served

Narrative Information

Of the 243 households assisted with CDBG funds, 151 were extremely low-income (0-30%), 69 were very low-income (31-50%), and 23 were low-income (51-80%). In the six units acquired with HOME CHDO funds, the tenants occupying the units have incomes ranging from extremely low to moderate median family income: two households are extremely low-income (0-30%), and four households are low-income (31-50%).

CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)

Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through:

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

For rapid re-housing programs, time to housing has been reduced by 53% over the previous year. Likewise, emergency shelter programs have reduced "time to exit" from these programs by 8% from the previous year and Transitional Housing programs have reduced "time to exit" by 18%. We are also seeing a very low rate of only 3% of persons being placed in positive housing and later returning to emergency shelter.

The street outreach programs including CAC Homeward Bound, Helen Ross McNabb Center's PATH program, Positively Living, and others are continuing and the Helen Ross McNabb Center has added an additional SAMHSA-funded program called Cooperative Agreement to Benefit Homeless Individuals (CABHI). CABHI was created to reduce homelessness among veterans and/or individuals with severe and persistent mental illness. The CABHI program provides outreach, case management, assistance finding employment and applying for disability benefits, in addition to on-going peer support.

As is true nationally, a lack of sufficient stock of affordable and very affordable housing continues to be a significant barrier to even more significantly reducing time-to-housing and ending homelessness. Work is ongoing to address this need.

Addressing the emergency shelter and transitional housing needs of homeless persons

As mentioned above, "time to exit" from the emergency shelter and transitional housing programs is reduced and the rate of persons returning to emergency shelter once placed in positive housing is at a very low rate. Affordable housing continues to be a barrier to meeting the needs and reducing the time to housing and ending homelessness. The County provided CDBG funding for the rehab of Catholic Charities (Samaritan Place) to increase the number of beds for emergency and transitional senior homeless housing.

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

The street outreach programs including CAC Homeward Bound, Helen Ross McNabb Center's PATH

program, Positively Living, and others are on-going and the Helen Ross McNabb Center has added an additional SAMHSA-funded program called Cooperative Agreement to Benefit Homeless Individuals (CABHI). CABHI was created to reduce homelessness among veterans and/or individuals with severe and persistent mental illness. The CABHI program provides outreach, case management, assistance finding employment and applying for disability benefits, in addition to on-going peer support.

In addition to the street outreach programs and the CABHI program, the County provided 2015 program funds to the Knox County Public Defender's Community Law Office (CLO) for their intensive recidivism program that works with homeless and potentially homeless and focuses on frequent contact with those at highest risk of being caught in the "revolving door" cycle through jails, emergency rooms, and shelters. The three goals of this program are: (1) reducing homelessness through accessibility to supportive and/or affordable housing, (2) reducing recidivism through intensive outreach efforts and connection to appropriate community service agencies and programs, and (3) empowering individuals to engage in the change process through supportive counseling.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

This jurisdiction has implemented rapid re-housing initiatives with the time to housing showing a 53% reduction over the previous year. We are also seeing a very low rate of only 3% of persons being placed in positive housing and later returning to emergency shelters. Street outreach programs including CABHI, PATH, and CAC Homeward Bound, and the CLO intensive recidivism program help individuals and families gain access to services and resources to remain stabilized in permanent housing. Programs are focused particularly on chronically homeless individuals and families, as well as veterans and their families.

CR-30 - Public Housing 91.220(h); 91.320(j)

Actions taken to address the needs of public housing

Knox County does not own nor operate a public housing authority. Knoxville's Community Development Corporation (KCDC), while located in the city of Knoxville, serves the needs of all the public housing residents within the city and county. KCDC owns, manages and maintains more than 4,000 low income rental units in the city and administers a program that allows approximately 1,700 families to secure affordable housing in the private market in Knoxville. As the major affordable housing provider, Knox County may refer eligible clients to KCDC for housing vouchers and shelter.

Knox County has been intensively committed to the physical enhancements of public housing located within Knox County: Nature's Cove and Autumn Landing. HUD funded improvements include physical interior improvements, water conservation improvements, and exterior lighting safety improvements. KCDC was approved by HUD in PY15 to convert these two Knox County located public housing properties to the Rental Assistance Demonstration (RAD) Program. Knox County will continue to review needs and assist if possible in future improvements of these RAD properties.

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

Actions to encourage public housing residents to become more involved in the management of KCDC and participate in homeownership will be addressed by KCDC in their Priority Plan.

Actions taken to provide assistance to troubled PHAs

KCDC is not "troubled" under 24 CFR Part 902.

CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j)

Actions taken 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. 91.220 (j); 91.320 (i)

Currently, there are no known public policies negatively affecting housing and residential investments. Knox County promotes affordable housing for individuals and investors through any resources possible and maintains an inventory of properties that are obtained through non-payment of property taxes. In compliance with Tennessee Code Annotated, selected properties are released through tax sales annually. Both individuals and investors are allowed to bid on Knox County properties, which are sold at below market values, allowing for a greater potential for individual and investor ownership of single family housing.

Actions taken to address obstacles to meeting underserved needs. 91.220(k); 91.320(j)

The largest single obstacle to meeting underserved priority needs continues to be a lack of available funding. Coupled with declining donations to the non-profit sector, the reductions have restricted the ability of the County and its subrecipients to respond to all housing and community development needs. Many low-income persons cannot find quality, affordable housing – they may lack the downpayment, it may not be appropriate for the disabled person or the senior, or transportation may be a major dilemma. To address these issues, Knox County has prioritized its funding as follows: (1) affordable and improved housing for low-to-moderate income populations, enhancing public housing, multi-family rental housing, and single-family housing; and, (2) public service projects to address the needs of low-to-moderate income populations including service provisions for medical, mental health, dental homelessness prevention, and special needs. In addition, the County will continue to:

- Maintain its support of non-profit agencies, the local housing authority, homeless providers and special needs groups in their goal to meet the underserved needs of the community. The County will continue to provide technical assistance to providers in pursuit of Federal, State, and other funding sources.
- Support non-profits receiving technical assistance through HUD sponsored training.

Actions taken to reduce lead-based paint hazards. 91.220(k); 91.320(j)

Reduction of lead-based paint hazards is proactively addressed by the continuation of funding for our Sustainable Housing program. The Knoxville/Knox County Community Action Committee (CAC), the agency contracted to provide Sustainable Housing for the County, has the needed lead-based paint detector equipment and three State certified lead-based paint risk assessors on staff to recognize and address lead for clients receiving housing assistance. In addition, construction contractors are Renovation, Repair, and Paint (RRP) certified to address lead-based paint.

Finally, CAC consults regularly with The Tennessee State Department of Environment and Conversation, Environmental Protection Agency, and the Department of Housing & Urban Development to discuss solutions to reducing lead hazards as well as changes to policy requirements.

Actions taken to reduce the number of poverty-level families. 91.220(k); 91.320(j)

Knox County is committed to reducing the number of poverty-level families within the County and uses the resources of many community partners, including the Knoxville/Knox County Community Action Committee, which has decades of service to the poor, the working poor and the homeless in the Knoxville/Knox County community. With Knoxville's Community Development Corporation as a major housing partner, the County seeks housing, whether units or vouchers, to help the poor find housing. The County works with the Continuum of Care to provide a spectrum of housing from shelters to transitional to permanent housing for the homeless, the formerly homeless and especially the chronically homeless.

With the goal of reducing poverty within the County, the County has made it a priority to use CDBG funds to provide much needed public services for the low and very-low income population. The range of public services funding includes services for mental health, health care, dental care or special needs care. In addition to making the reduction of poverty a priority, the County encourages Section 3 training, contracting and reporting when applicable to increase employment opportunity for low-to-moderate income populations.

Through collaborative efforts with experienced service providers, focused funding of limited resources and leveraging the resources of other local agencies, such as Knoxville's Community Development Corporation, Knox County is addressing the needs of underserved populations when possible.

Actions taken to develop institutional structure. 91.220(k); 91.320(j)

Knox County continues to fund service providers and non-profit agencies that have been serving the low-to-moderate income populations in Knox County historically. Funded agencies are provided vital funds for staffing and operational costs to enable the agencies to provide public service and housing programs. Without the HUD funds, many agencies would be required to evaluate program outreach and service which would affect the number of low-to-moderate assisted in the community.

Funded agencies are reviewed prior to selection in the annual application process. Review is completed to assess financial, institutional and staffing capabilities prior to funding.

Actions taken to enhance coordination between public and private housing and social service agencies. 91.220(k); 91.320(j)

Knox County continues to improve technical assistance efforts and outreach to subrecipients, resulting in high rates of compliance with program regulations, reporting requirements, and, most importantly,

delivery of services. Currently, Knox County conducts (2) annual meetings inclusive of public, private, and social service agencies to provide a forum for dialogue and discussion of community needs.

Identify actions taken to overcome the effects of any impediments identified in the jurisdictions analysis of impediments to fair housing choice. 91.520(a)

Knox County has a history of encouraging housing choice, affirmatively marketing fair housing, and being responsive in the analysis of any possible barriers to affordable housing. In addition, the County continually provides fair housing posters and booklets to all HUD funded housing agencies and annually offers Fair Housing training with materials for all funded agencies, whether public service or housing agencies. During the month of April, Knox County Community Development (KCCD) seeks to bring awareness to governmental officials by proclaiming April as Fair Housing Month in Knox County. The County Mayor reads a Fair Housing Proclamation during the County Commission meeting with agencies and local HUD Fair Housing Office representatives in attendance.

Additionally, KCCD has sought to provide Fair Housing educational outreach to minority communities within Knox County by distributing Fair Housing materials to both the Urban League and Centro Hispano.

CR-40 - Monitoring 91.220 and 91.230

Describe the standards and procedures used to monitor activities carried out in furtherance of the plan and used to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

The standards and procedures for monitoring activities and projects have three components: Workshop and Application, Contracts, and Monitoring Compliance

- Workshop and Application – Knox County agencies are invited to attend a workshop in mid-January to get a quick overview of the Application, CDBG and federal requirements, and reporting. This allows agencies the necessary time to ask questions prior to submitting an application. Each program year, agencies will be evaluated for compliance and performance. It should be noted that prior to any future funding allocations if an agency is not meeting program goals their performance will be evaluated to determine if there were extenuating circumstances that prevented them from reaching their goal. Subsequent program funding will be adjusted accordingly to both high performing programs and programs experiencing performance difficulties.
- Contracts - Based on the submitted application from the agency, a contract is developed that addresses HUD requirements, the budget, performance measurements, and a detailed project scope. Contracts become the basis for monitoring compliance as they also provide for the termination of the contract or non-payment of subrecipient reimbursement request(s) based on performance, and/or possible invoice fraud and/or mismanagement of funds.
- Monitoring Compliance - Knox County uses a performance-based system to determine the priorities and frequency for monitoring subrecipients. The monitoring process involves desk audits of reports and supporting documentation, onsite monitoring reviews, phone and e-mail contact, and possible technical meetings. Emphasis is placed on guaranteeing that subrecipients and other partners receiving HUD funds comply with all contract and HUD requirements, specific grant requirements and all federal requirements such as the financial standards outlined in the COFAR, any regulations that govern Fair Housing and Equal Opportunity, environmental standards (including an environmental review for all projects before federal funds are drawn). Every project is monitored throughout each fiscal year. Public service activities are reviewed monthly and quarterly as a part of desk based monitoring through reports submitted by the funded agencies. Construction projects are monitored throughout the construction phases to insure that applicable regulatory requirements such as Davis Bacon and Section 3 are being complied with by contractors and subcontractors. In addition to the monthly and quarterly monitoring, subrecipients receive annual on-site monitoring of their project or activity. HOME Monitoring Compliance - Construction and acquisition projects are monitored annually throughout the affordability period to ensure compliance with high and low HOME rents, affirmative marketing, tenant selection criteria, and other HOME requirements. On-site inspections ensures compliance with property conditions

both inside and outside of the structures.

Citizen Participation Plan 91.105(d); 91.115(d)

Describe the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.

In an effort to ensure adequate and accessible citizen participation, Knox County developed a Citizen Participation Plan (CPP), which outlines the procedures and processes used by the County and is part of the approved 2015-2020 Consolidated Plan. In accordance with the CPP, the County placed a notice of the public hearing and comment period for the Consolidated Annual Performance and Evaluation Report (CAPER) in the local newspaper on August 2, 2016. The CAPER comment period was August 2, 2016 through September 2, 2016 and the public meeting to review the CAPER was August 22, 2016 in the Small Assembly Room of the City/County Building. A draft of the 2015 CAPER was placed on the Community Development website prior to the public meeting and after review and approval by HUD, the "final" CAPER will be added. Copies of the final CAPER are located at the main library and the Knoxville/Knox County Community Action Committee (CAC).

Notices placed on the website or in the local newspaper concerning public meetings, including the Annual Action Plan or the Consolidated Annual Performance and Evaluation Report, provide information in Spanish for minorities and non-English speaking residents about where to contact for comments or assistance. Translators are also available at public meetings.

CR-45 - CDBG 91.520(c)

Specify the nature of, and reasons for, any changes in the jurisdiction’s program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.

Knox County did not have any significant changes to the program objectives (public services and housing) established in the 2015-2020 Consolidated Plan and carried forth in the 2015 Annual Action Plan. Knox County’s primary focus for the CDBG funds is on affordable and improved housing for low-to-moderate income populations, enhancing both public housing as well as single-family housing. Additionally, Knox County uses up to 15 percent of its allocation for public service projects to address medical, mental health, dental, homelessness prevention, and special needs. Funds are directed toward the primary objective of the provision of services to assist individuals with the greatest needs and whose resources are very limited. Agencies annually selected for the County’s HUD allocations are dedicated to serving the community with service provisions that result in providing basic and essential needs addressing core life issues.

Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?	No
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CR-50 - HOME 91.520(d)

Include the results of on-site inspections of affordable rental housing assisted under the program to determine compliance with housing codes and other applicable regulations

Please list those projects that should have been inspected on-site this program year based upon the schedule in §92.504(d). Indicate which of these were inspected and a summary of issues that were detected during the inspection. For those that were not inspected, please indicate the reason and how you will remedy the situation.

Please list those projects that should have been inspected on-site this program year based on the schedule 92.504(d). Indicate which of these were inspected and a summary of issues that were detected during the inspection. For those that were not inspected, please indicate the reason and how you will remedy the situation.

On-Site Inspections – Construction and acquisition projects are monitored annually throughout the affordability period to ensure compliance with high and low HOME rents, affirmative marketing, tenant selection criteria, and other HOME requirements. On-site inspections ensures compliance with property conditions both inside and outside of the structures. For 2015, Knox County conducted on-site visits to project locations, reviewed resident files in conjunction with the HOME Compliance Report to verify their eligibility, and then responded by letter to the agency with results of the review.

In doing desk review of the HOME Compliance Report prior to going on-site, Knox County discovered that an agency was overcharging six residents in three properties because they were using an incorrect utility allowance. Restitution was immediately made to the six residents as follows: one person in the amount of \$72, three people in the amount of \$60 each, one person in the amount of \$30, and one person in the amount of \$18. The correct utility allowance is now being applied in all properties.

Provide an assessment of the jurisdiction's affirmative marketing actions for HOME units. 92.351(b)

Knox County's HOME written agreement requires subrecipients to submit an Affirmative Marketing Plan for development containing five or more HOME-assisted units. During on-site reviews, subrecipients must provide evidence that they follow their plan in advertising, flyers, etc. and that the plan is still in place.

The County continues to further affirmative marketing actions to involve minorities and women in the HOME program. Knox County Purchasing contacts their Business Outreach Division when looking for vendors and the department then notifies potential contractors. The County also adheres to the following policies and procedures:

- When informing the public, owners, and potential tenants about the Federal fair housing laws

and affirmative marketing policy the Equal Housing Opportunity logotype or slogan is used in press releases and solicitations for owners, and written communication to fair housing and other groups.

- Owners of rental units containing five or more units are required to use the Equal Housing Opportunity logotype or slogan in advertising and display of the fair housing posters.
- Data, including racial and ethnicity, of households is maintained on property that receives rehab assistance.
- Owners are required to maintain data, including racial and ethnicity, of households displaced as a result of program activities.
- Owners are required to maintain data of tenants, including how potential applicants, were informed of the housing opportunities (Tenant Selection Policy).
- Affidavits are maintained on legal or public notices placed in the *Knoxville News Sentinel* and/or community papers.

Refer to IDIS reports to describe the amount and use of program income for projects, including the number of projects and owner and tenant characteristics

Knox County received \$6,710.23 in Program Income from HOME.

Describe other actions taken to foster and maintain affordable housing. 91.220(k) (STATES ONLY: Including the coordination of LIHTC with the development of affordable housing). 91.320(j)

The County has affordable housing as a number one priority and funds a majority of its CDBG and HOME dollars toward maintaining the existing housing stock. Programs are geared for low-to-moderate income persons and provide single-family housing rehab, multi-family rental rehab, rehab of permanent supportive housing, and acquisition of multi-family rental housing.