

City of Franklin

**CONSOLIDATED ANNUAL
PERFORMANCE AND
EVALUATION REPORT
2013/2014 Program Year
2010-2015 Consolidated Plan for Housing and
Community Development**



July 1, 2013 - June 30, 2014



2010-2015 Consolidated Plan Fourth Program Year CAPER

The CPMP

2013/2014 Program Year CAPER

2010-2015 Consolidated Plan

Consolidated Annual Performance and Evaluation Report includes Narrative Responses to CAPER questions that CDBG, HOME, HOPWA, and ESG grantees must respond to each year in order to be compliant with the Consolidated Planning Regulations. The Executive Summary narratives are optional.

The grantee must submit an updated Financial Summary Report (PR26).

GENERAL

Executive Summary

This module is optional but encouraged. If you choose to complete it, provide a brief overview that includes major initiatives and highlights that were proposed and executed throughout the first year.

Program Year 4 CAPER Executive Summary response:

Executive Summary

The following table lists the goals for the third year of the Franklin 2010-2015 Five Year Consolidated Plan for Housing and Community Development and the status of their accomplishments.

GOALS	ACCOMPLISHMENTS
1. Complete 10 Homeowner Rehab projects under the Emergency Demonstration Rehabilitation Program	<ul style="list-style-type: none">• Program manager selected;• New tiered environmental review approved by HUD• 5 projects completed• 1 project under contract
2. One project by Community Based Development Organizations (CBDO)	<ul style="list-style-type: none">• RFP released• Funds awarded and committed to two CBDOS• Closed on single family home at 745 Mt. Hope St. (CDBG used for construction)• Groundbreaking for affordable subdivision on Mt. Hope St. (5 homes, CDBG will be used for infrastructure)
3. Counsel 13 households in fair housing/homeownership and conduct fair housing education outreach program to residents, landlords, and the real estate industry	<ul style="list-style-type: none">• 2 households counseled• 2 community workshops

General Questions

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1. Assessment of the one-year goals and objectives:
 - a. Describe the accomplishments in attaining the goals and objectives for the reporting period.
 - b. Provide a breakdown of the CPD formula grant funds spent on grant activities for each goal and objective.
 - c. If applicable, explain why progress was not made towards meeting the goals and objectives.
2. Describe the manner in which the recipient would change its program as a result of its experiences.
3. Affirmatively Furthering Fair Housing:
 - a. Provide a summary of impediments to fair housing choice.
 - b. Identify actions taken to overcome effects of impediments identified.
4. Describe Other Actions in Strategic Plan or Action Plan taken to address obstacles to meeting underserved needs.
5. Leveraging Resources
 - a. Identify progress in obtaining "other" public and private resources to address needs.
 - b. How Federal resources from HUD leveraged other public and private resources.
 - c. How matching requirements were satisfied.

Program Year 4 CAPER General Questions response:

Assessment of the one-year goals and objectives

Goal: Complete 10 Homeowner rehab projects under the Emergency Demonstration Rehabilitation Program.

Objective 1: Continue Emergency Demonstration Rehabilitation Program.

Accomplishments: 5 projects completed; 1 project under contract

Breakdown of 13/14 Grant Funds: \$128,308 budgeted; \$0 expended

Progress Assessment: Five (5) rehab projects were completed this program year. Including this year, 67 projects since program startup have been completed. The City met 50% of the goal for this year.

Goal: One project by Community Based Development Organizations (CBDO).

Objective 2: Identify and fund a Community Based Development Organization(s) (CBDO) to either complete an acquisition/rehabilitation for sale or new construction of a homeowner unit.

Accomplishments: During the 2013/2014 program year, a Request for Proposals with scope of services was drafted, reviewed, and released. Two CBDOs were awarded funds. One single family house for purchase by a low to moderate income homebuyer was completed and sold. A CBDO also had a

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groundbreaking for a subdivision that will receive CDBG funding for infrastructure development.

Breakdown of 13/14 Grant Funds: \$61,686 budgeted; \$31,000 expended

Progress Assessment: All funds have been awarded and committed. Work on the selected project(s) is underway. The City met 100% of its goal this year. Remaining funds will be expended during the 2014/2015 program year to complete the activity.

Goal: Counsel 13 households in fair housing/housing and conduct fair housing education outreach program to residents, landlords, and the real estate industry.

Objective 3: Continue a homeownership and fair housing counseling program.

Accomplishments: During the 2013/2014 program year, held 2 community workshops; 2 households counseled on fair housing attended by over 30 persons.

Breakdown of 13/14 Grant Funds: \$ 7,402 budgeted; \$ 14,866 expended*

Progress Assessment: During the 12/13 program year City staff met and worked with a non-performing contractor to address spending and program delivery issues, but has been unable to reach resolution. During the 2013/2014 program year, the City contracted with a different provider to deliver these services and expend the remaining funds through the end of the 2014 calendar year. Services during this program year are being efficiently and professionally delivered, and unexpended funds from prior years are being utilized.

Changes to the program as a result of experiences

The CAPER report covers the fourth program year of the current five year Consolidated Plan. Each of the program goals established for this fourth year represent continuations of programs that were established in previous years. Each of the programs has been successfully operated through partnerships with local non-profits and no substantive changes have been identified as needed, other than noted above. Through community input and monitoring the City of Franklin will be able to identify any changes that may be required and implement those as appropriate.

Affirmatively Furthering Fair Housing

The City of Franklin has completed an Analysis of Impediments (AI) to Fair Housing Choice. An "impediment" to fair housing choice is defined as actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin that restrict housing choices or the availability of housing choice or any actions, omissions, or decisions that have this effect. There are several primary reasons behind the City undertaking an AI, including:

- The City realizes the importance of having housing choice for its residents and consequently the importance of removing impediments to housing retention, development and use by all citizens;

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- The City has recently appointed an Affordable and Workforce Housing Advisory Committee to the Board of Mayor and Aldermen and the Fair Housing Committee that understands the connection between affirmatively furthering fair housing choice and promoting affordable/workforce housing;
- The City was awarded Community Development Block Grant (CDBG) entitlement status by the U.S. Department of Housing and Urban Development.

The City's "Housing Development Coordinator" position is specifically responsible for partnering with the community, staff, various committees and public and private organizations in order to serve as the City's point of contact for all affordable housing development and fair housing choice initiatives and programs. The Housing Development Coordinator also participates as a member of the Fair Housing Committee and the Affordable/Workforce Housing Advisory Committee to the Board of Mayor and Aldermen. This position has been, to date, funded by the City of Franklin as a staff headcount.

The AI was prepared by the City of Franklin's Housing Development Coordinator following review of the Fair Housing Planning Guide Book and the Fair Housing Plan: Procedures for Mapping Analysis of Impediments. Input from residents, public and private service providers and citizens knowledgeable of the community contributed significantly to other data sources for identification of the Impediments to Fair Housing Choice and the actions designed to address those Impediments.

Impediments identified and addressed by actions in the AI are as follows:

- LACK OF AFFORDABLE HOUSING CHOICE
- LACK OF AWARENESS AND UNDERSTANDING OF FAIR HOUSING LAWS
- LACK OF OUTREACH AND EDUCATION TO THE COMMUNITY CONCERNING FAIR HOUSING
- LACK OF A PLAN AND FORMAL PROCESS FOR ADDRESSING FAIR HOUSING ISSUES ON AN ONGOING BASIS

A summary of the analysis considered in determining the Impediments, as well as Twenty-one (21) specific actions developed to address each of the above Impediments, are discussed in detail in Section IV of the Analysis of Impediments document.

Actions Implemented and Discussed in More Detail in Section V of the AI:

- Fair Housing Choice Ordinance
- Barrier Free Construction Ordinance
- Affordable and Workforce Housing Round-up Ordinance & Program
- CDBG Allocation of \$15,530 for Fair Housing Training
- Second Annual Housing Fair
- Foreclosure Task Force
- TNHousingSearch.org
- City Staff Training & Conference Participation
- Uniform Residential Landlord and Tenant Act Training

The Analysis of Impediments and the Consolidated Planning actions and goals will be worked in concert with the objective to continually improve the effectiveness of our collective efforts in the community to Affirmatively Further Fair Housing Choice.

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Specific Actions Undertaken in the 2013/2014 Program Year:

1. The City of Franklin sponsored and staff attended the annual Fair Housing Conference
2. Coordinated fair housing training and service activities with Franklin Housing Authority
3. Fair Housing public service announcements on Channel 10
4. Fair Housing brochures and materials distributed in the community
5. THDA's TNHousingSearch.org marketing materials and program information are prominently on display in City Hall offices
6. The City has a Fair Housing Task Force as part of the City's Affordable Housing Advisory Committee
7. As part of the Annual Update to the Consolidated Plan for the 2013/2014 program year, CDBG funds were allocated for Fair Housing counseling/training

Actions in Strategic Plan or Action Plan taken to address obstacles to meeting underserved needs

The City's complete focus during the year was on implementing and following the goals and objectives presented in the Consolidated Plan. These actions were addressed above in the accomplishments and progress assessment discussions for each of the plan's goals and objectives.

Leveraging Resources

Additional community development resources have been leveraged as a result of the City becoming an entitlement jurisdiction. Receiving a direct entitlement of CDBG funds automatically qualified the City as a State of Tennessee Small City Entitlement Jurisdiction under THDA's Emergency Shelter Grant Program. These funds have been passed on to local non-profit organizations that in return are required to supply a one-to-one match to their ESG contracted amount. Local CBDOs have applied for State HOME and NSP funds and received Federal Home Loan Bank funds. These same organizations also use the THDA Community Investment Tax Credit program. A regional Community Development Financial Institution (CDFI) has provided financing to CBDOs and the local Habitat for Humanity chapter, and contracted for services with a local housing counseling agency.

During the reporting period, the City sponsored a community cleanup in Hill Estates, a low to moderate income neighborhood. Keep Williamson Beautiful donated bags comprised of trash pickers, garbage bags, gloves, reflective vests, water, and hand sanitizer. Ten smoke detectors were installed on-the-spot by firemen of the Franklin Fire Department. Community Housing Partnership of Williamson County, the non-profit operating the CDBG Emergency Rehab program received 13 applications for home rehabilitation. Other partners in the effort included: Franklin Solid Waste Department, Liberty Oaks Apartments, Middle Tennessee Electric MC, Williamson County Animal Control, Big Harpeth Primitive Baptist Church, and Christ Fellowship Church.

Managing the Process

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1. Describe actions taken during the last year to ensure compliance with program and comprehensive planning requirements.

Program Year 4 CAPER Managing the Process response:

Actions taken to ensure compliance with program and comprehensive planning requirements

Key staff members attended a number of trainings, conferences, workshops, etc., to further educate themselves in the fields of community development and affordable housing. In no particular order, a sampling of these include: Completed the certification for NeighborWorks Training Institute on housing rehabilitation; HUD State Entitlement Conference.

The City has a Consolidated Planning Process plan which provides for, and encourages, citizen participation and which emphasizes participation by persons of low- or moderate-income. The plan:

- provides citizens with access to local meetings, information, and records related to the use of funds;
- provides for public hearings to obtain citizen views and to answer questions at all stages of the consolidated planning process, including the development of needs, the review of proposed activities, and review of program performance;
- provides for timely written answers to written complaints and grievances; and
- addresses how the needs of non-English speaking residents will be met at public hearings.

Citizen Participation

1. Provide a summary of citizen comments.
2. In addition, the performance report provided to citizens must identify the Federal funds made available for furthering the objectives of the Consolidated Plan. For each formula grant program, the grantee shall identify the total amount of funds available (including estimated program income), the total amount of funds committed during the reporting period, the total amount expended during the reporting period, and the geographic distribution and location of expenditures. Jurisdictions are encouraged to include maps in describing the geographic distribution and location of investment (including areas of minority concentration). The geographic distribution and expenditure requirement may also be satisfied by specifying the census tracts where expenditures were concentrated.

*Please note that Citizen Comments and Responses may be included as additional files within the CPMP Tool.

Program Year 4 CAPER Citizen Participation response:

Summary of Citizen Comments

A public hearing on the Consolidated Annual Performance and Evaluation Report was held on August 21, 2014. The public advertisement is attached.

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Comments:

[Inset Comments]

Summary of Funds and Expenditures

Program	Budgeted Funds	Program Income	Committed Funds	Expended Funds	Geographic Distribution
Emergency Rehabilitation	\$128,308	\$0	\$128,308	\$0	Dispersed throughout Franklin
CBDO Program	\$61,686	\$0	\$61,686	\$31,000	Project is in Natchez Neighborhood
Fair Housing Counseling	\$7,402	\$0	\$7,402	\$14,866**	Not Applicable
Administration	\$49,350	\$0	\$49,350	\$27,460	Not Applicable
TOTAL	\$246,747	\$0	\$246,747	\$73,326	Not Applicable

* U.S. Census Tracts 050600 and 050800

** includes funding from prior program years

Institutional Structure

1. Describe actions taken during the last year to overcome gaps in institutional structures and enhance coordination.

Program Year 4 CAPER Institutional Structure response:

Gaps in Institutional Structures

There were no substantial changes to the institutional structure for delivering Consolidated Plan programs from that outlined in the 2010-2015 Franklin Consolidated Plan. The identification of gaps is part of the City’s ongoing assessment and evaluation of the program as it evolves, and is addressed in succeeding Consolidated Plan updates and Performance Reports. Coordination has been enhanced by appointment of the Affordable Housing Committee in January 2008 and its reestablishment in early 2011 as an Affordable Housing Commission that includes representatives from the City, private and non-profit development community, neighborhood groups, real estate professionals, counseling agencies, private citizens, and other housing professionals. The creation of subcommittees to this Commission has also brought additional stakeholders into the process of planning for affordable housing and community development needs. Contracting with local non-profit

Contracting with a local non-profit organization to operate the Emergency Rehabilitation program builds the capacity and effectiveness of the institutional structure that delivers affordable housing and community development programs within the City.

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organizations to operate the Emergency Rehabilitation Program, develop projects as CBDOs, and provide Fair Housing counseling and outreach is also building the capacity and effectiveness of the institutional structure for delivering affordable housing and community development programs within the City.

The City's Housing Development Coordinator has extensive knowledge of affordable/workforce housing and is active in the community. The position coordinates the workforce and affordable housing and modernization programs for the City of Franklin. The Housing Development Coordinator is responsible for the coordination and supervision of all activities involved in the implementation of affordable, workforce, and housing modernization/rehabilitation programs. Work will involve the preparation of conceptual program designs, soliciting participation in programs, coordinating proposals with various City, State and Federal agencies for approval of funding assistance, developing strategies for joint participation and financial planning, design analysis, negotiation of development agreements with private and non-profit developers, economic viability analyses, and oversight of construction and redevelopment budgets, and facility management.

Monitoring

1. Describe how and the frequency with which you monitored your activities.
2. Describe the results of your monitoring including any improvements.
3. Self Evaluation
 - a. Describe the effect programs have in solving neighborhood and community problems.
 - b. Describe progress in meeting priority needs and specific objectives and help make community's vision of the future a reality.
 - c. Describe how you provided decent housing and a suitable living environment and expanded economic opportunity principally for low and moderate-income persons.
 - d. Indicate any activities falling behind schedule.
 - e. Describe how activities and strategies made an impact on identified needs.
 - f. Identify indicators that would best describe the results.
 - g. Identify barriers that had a negative impact on fulfilling the strategies and overall vision.
 - h. Identify whether major goals are on target and discuss reasons for those that are not on target.
 - i. Identify any adjustments or improvements to strategies and activities that might meet your needs more effectively.

Program Year 4 CAPER Monitoring response:

Monitoring of Activities

The activities performed by an outside contractor or subrecipient are the Emergency Demonstration Rehabilitation Program, CBDO projects, assistance to Homeless shelter, and the Fair Housing Counseling and Outreach Program. City staff was integrally involved with the Fair Housing subgrantee, with weekly and often more frequent meetings occurring at the subgrantee and grantee offices. Franklin staff has been in continuing discussions about the delayed billings from this subgrantee

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and worked on proper invoicing and payment procedures with this contractor. Unfortunately, at this time, due to lack of performance, the City is terminating the existing contract with this agency. In order to continue providing these valuable services, the City of Franklin is negotiating a new contract with another qualified subgrantee. The City of Franklin met with the full staff of Community Housing Partnership to conduct a monitoring visit and no findings resulted. For the CBDO and Shelter program in a similar fashion to the rehabilitation program, the City has been integrally involved with the grantees in program issues and during the design and construction processes.

Self Evaluation

The effect programs have in solving neighborhood and community problems. Emergency rehabilitation was selected for funding because it has a more immediate and visible impact on solving neighborhood and community problems. With the modest amount of funds available, doing something quick and that residents can see is the best way to jumpstart a bigger revitalization of the neighborhood. It also has an immediate and dramatic impact on the lives of the families that are assisted and allows them to remain in their homes. It is anticipated that making improvements on a few properties will encourage other property owners to invest their personal funds in their properties, and encourage new investment and construction in the area. Several new homes and/or acquisition rehabs have been or are planned to be constructed in both the Hard Bargain and Natchez Neighborhoods through the CBDO program.

Meeting priority needs and specific objectives and helping make the community's vision of the future a reality. Progress toward meeting specific Consolidated Plan objectives was discussed in a previous section. There were five priority housing needs identified in the Consolidated Plan: 1) Assistance to extremely low and low income homeowners, particularly the elderly; 2) Assistance to moderate income homeowners; 3) Assistance to moderate income renters; 4) Assistance to extremely low and low income renters, particularly elderly and small households with higher cost burdens. Obviously, not all the issues facing these groups can be solved with the City's limited amount of CDBG funds. However, assistance to the first group is the target of the Emergency Rehabilitation Program and getting it established has been the focus of first year efforts. The CDBO program, discussed earlier and started in the 2008/2009 program year, is largely designed to assist the third group, who as renters with moderate incomes can become first-time homeowners with some assistance. In addition, the Fair Housing Counseling and Outreach Program targets renters to help them understand their rights and responsibilities. Some of the City's plans to address barriers to affordable housing will be of assistance to the second group, moderate income homeowners, who by virtue of higher incomes stand to be more impacted by procedural type initiatives that lower the costs of developing affordable housing.

Providing decent housing and a suitable living environment and expanded economic opportunity principally for low and moderate income persons. All of the Consolidated Plan objectives are categorized as Decent Housing for reporting purposes. The two funded CDBG projects, the Emergency Demonstration Rehabilitation Program and the Needs Assessment of Homeless and Special Needs Populations are both about providing decent housing for specific populations. The rehab program is by definition making decent housing out of substandard housing. The Needs Assessment upon completion will identify the existing inventory of

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housing and services, an estimate of the number of homeless persons and special needs populations, the linkages between housing and services, and an evaluation of the gaps in housing and services. As previously discussed, some of the initial data gathering and collaborations needed to conduct the Needs Assessment is underway.

Although the Consolidated Plan objectives are categorized as Decent Housing, they certainly also make for a suitable living environment and expand economic opportunity. Housing does not occur in a vacuum, but rather has a positive or negative impact on the environment in which it is located. Decent housing is a necessary building block to a suitable living environment and offers the stable personal and financial setting that enables individuals to contribute to neighborhood-wide improvement programs. Likewise, it is nearly impossible for a low to moderate income person to take advantage of economic opportunities if they are in an unstable living arrangement.

Activities falling behind schedule. As discussed previously, the Emergency Demonstration Rehabilitation Program is generally on schedule, with the understanding that the nature of an ongoing rehab program bridges program years and there was a delay due to the need to have an approved environmental review process. The CBDO activity is underway, property was purchased and construction is started and is to be completed in program year 2013/2014. The Fair Housing program is being restructured due to a current lack of capacity on the part of the past non-profit provider. City staff met and corresponded regularly with the non-profit provider from previous years about performance and capacity issues but was unable to reach a successful resolution or contractual relationship for the 2012/2013 year. The City is in the process of contracting with another provider to deliver those services in 2013/2014. The assistance to the Homeless shelter is under contract and the funded activity being implemented.

How activities and strategies made an impact on identified needs. Please refer to previous answers in this section on progress towards meeting the needs and objectives outlined in the Consolidated Plan.

Indicators that would best describe the results.

Activity/Objective	Indicator(s)
Emergency Demonstration Rehabilitation Program	<ul style="list-style-type: none">• Cases completed• Cases under contract• Number of applications• Number of households & persons assisted
Community Based Development Organization (CBDO) Program	<ul style="list-style-type: none">• CBDOs identified and selected• Units developed• Units under agreement to be developed• Number of households & persons assisted
Fair Housing Counseling and Outreach Program	<ul style="list-style-type: none">• Number of Materials produced and advertisements in public locations• Number of community workshops• Number of counseled clients

Barriers that had a negative impact on fulfilling the strategies and overall vision. Two barriers stand out with the first being the absence of affordable land for development in CBDO target areas, restricting the options and alternatives available if the initial targeted property proves difficult to purchase. A second obstacle is the capacity of contracted non-profits to both deliver services and timely complete the

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administrative functions for their agencies; this is a particular concern with the housing counseling agency and may increase as federal funding for counseling services is decreased.

Major goals that are on target and reasons for those that are not.

Goals	Status	Comments
10 Rehab projects annually	50% of goal met	Program manager selected, 6 projects completed or under contract in program year 2013/2014
One CBDO project completed	100% of goal met	CBDO RFP released, 2 CBDOs selected, agreements executed, property identified, acquired, construction underway
Counsel 13 households in fair housing/housing issues and outreach to community	60% of goal met	2 public workshops, 2 households counseled

Adjustments or improvements to strategies and activities. No notable adjustments or changes to any activities were made during the 2012/2013 program year.

Lead-based Paint

1. Describe actions taken during the last year to evaluate and reduce lead-based paint hazards.

Program Year 4 CAPER Lead-based Paint response:

Actions taken to evaluate and reduce lead-based paint hazards

The following excerpt is from the Policies and Procedures Manual for the Emergency Rehabilitation Program: When applicable, the work will also include testing, remediating, and clearing structures for lead-based paint hazards. All structures constructed pre-1978 must be tested and cleared for lead-based paint hazards. In the presence of lead-based paint hazards, contractors/workers are required to be certified in and use safe-work practices. Applicants are also being provided with the EPA brochure entitled Protect Your Family From Lead In Your Home.

All funded Emergency Rehabilitation projects are having a lead based paint test that is documented in each project book. That report is provided to the homeowner. If there is lead based paint where any rehabilitation activity is being done then it is contained during the activity, however this has been rare. There has been one instance when windows that were being replaced had lead based paint and they were removed in accordance with required practices and taken to the approved (lined) landfill.

HOUSING

Housing Needs

*Please also refer to the Housing Needs Table in the Needs.xls workbook.

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1. Describe Actions taken during the last year to foster and maintain affordable housing.

Program Year 4 CAPER Housing Needs response:

Actions to Foster and Maintain Affordable Housing

The goals established in the Housing Needs Table in the Consolidated Plan for Year 1 were to directly assist homeowners with incomes from 0% to 50% of the median family income. The Emergency Demonstration Rehabilitation Program targets elderly households with incomes less than 50% of the median family income. The Housing Needs Table also shows relatively large numbers of moderate income renters (50% to 80% median family income) with housing needs. The CBDO program is largely targeted to those households; the program provides funding to non-profit organizations developing affordable homebuyer housing. The Fair Housing Counseling and Outreach program addresses the education of renters of all incomes, but particularly those below 80% of the median family income. The Barriers to Affordable Housing Study addressed the housing needs of every subpopulation of households with incomes less than 80% of the median family income by developing strategies to facilitate development of housing affordable across income stratum.

Specific Housing Objectives

1. Evaluate progress in meeting specific objective of providing affordable housing, including the number of extremely low-income, low-income, and moderate-income renter and owner households comparing actual accomplishments with proposed goals during the reporting period.
2. Evaluate progress in providing affordable housing that meets the Section 215 definition of affordable housing for rental and owner households comparing actual accomplishments with proposed goals during the reporting period.
3. Describe efforts to address "worst-case" housing needs and housing needs of persons with disabilities.

Program Year 4 CAPER Specific Housing Objectives response:

Progress in providing housing to targeted income stratum

Emergency Rehabilitation Program 2013-2014 Program Year					
Income	Goal	Accomplishment	Race	Elderly	Family Type
Extremely low income <=30% MFI	5	1 completed	White =1	1 >=55 1=disabled	Small Related =1
Low income >30 to <=50% MFI	5	4 completed	Black =2 White =2	3 >=55 3=disabled	Small Related =1
Moderate Income >50 to <=80% MFI	0	0 completed			

Progress in providing housing that meets Section 215

This is applicable to entitlement jurisdictions receiving HOME Investment Partnership funds. The City of Franklin does not receive HOME funds. However, all of the program participants in the Emergency Rehabilitation Program would meet the income criteria established for homeowners in Section 215, and be well within the maximum property value limits.

Efforts to address “worst case” housing needs and housing needs of persons with disabilities

The Emergency Rehabilitation Program is restricted to low income elderly persons and households with a disabled member. Five of the 6 rehab cases completed or under contract were for disabled households. Other than by income as presented in the previous section, the Consolidated Plan did not set goals for “worst case” housing needs or housing needs for disabled persons. The Homeless Counts help assess the demand and needs for housing by persons experiencing homelessness. Most noteworthy in the effort to address “worst case” housing needs is the City’s receipt of Emergency Shelter Grant funds through the State of Tennessee, which are being used to meet the housing needs of domestic violence victims and at risk teens.

Most noteworthy in the effort to address “worst case” housing needs is the City’s receipt of Emergency Shelter Grant funds through the State of Tennessee, which are being used to meet the housing needs of domestic violence victims and persons recently incarcerated in correctional facilities.

Public Housing Strategy

1. Describe actions taken during the last year to improve public housing and resident initiatives.

Program Year 4 CAPER Public Housing Strategy response:

Public Housing and Public Housing Resident Initiatives

The Franklin Housing Authority’s lease and all related policies comply with the requirements of the Quality Housing and Work Responsibility Act (QHWRA). Policies address deconcentration and income mixing, thereby encouraging higher income families in the developments. Although the FHA has provided incentives for higher income families, the majority of their applicants are from the extremely low income levels. All policies are reviewed on a regular basis.

Capital Fund Program

Funding under the Capital Fund Program was \$523,532 for 2010. The Authority’s primary focus under the FY 2010 Annual Plan was to construct a new maintenance facility and to support its redevelopment activities.

Revitalization and Redevelopment

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Over the next five years, it is the intent of the Franklin Housing Authority to demolish all 297 units of public housing and to redevelop them with a mixed income approach. FHA intends to use their 56+ acres to rebuild 308 public housing units. FHA has hired a master developer to assist in putting together a master plan for transforming Franklin's public housing. The plan is to rebuild back 308 units of public housing as well as to create more affordable, workforce housing, and ownership opportunities. FHA will seek to purchase property off-site for replacement housing. No demolition will occur until such time that replacement housing is deemed obtainable.

Homeownership and Resident Involvement

The Franklin Housing Authority encourages its residents to enter paths toward self-sufficiency. Preferences exist for families working or engaging in training or education programs for non-housing programs operated or coordinated by the Authority. Although the Authority has no current homeownership program, they encourage their residents to pursue that dream and as mentioned in the previous section are hoping to include a homeownership component in the redevelopment of their property. The Authority also works with outside and/or resident organizations for the provision of crime and drug prevention activities, as well as activities targeted to at-risk youth, adults, and seniors.

Barriers to Affordable Housing

1. Describe actions taken during the last year to eliminate barriers to affordable housing.

Program Year 4 CAPER Barriers to Affordable Housing response:

Eliminating Barriers to Affordable Housing

In January 2008, the Franklin Board of Mayor and Alderman appointed an Affordable Housing Committee charged with facilitating affordable housing development in the City. Early in 2011 the Committee was reestablished as an Affordable Housing Commission. Much as the original committee did, the Commission does much of its work through a committee structure:

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The work of the committees on barriers to affordable housing has already resulted in the adoption of a new section of the Zoning Ordinance dealing exclusively with affordable and workforce housing. The section defines common affordable housing terms and as a first step, exempts building permit and plan review fees for affordable housing projects developed by non-profit housing organizations. Perhaps more importantly, by incorporating affordable housing as a section of the City's zoning code, the institutional structure is in place for future codified initiatives. In October and November 2008, two new ordinances were passed that created a "Water and Wastewater System Development and Access Fee Incentive Program" used to establish a Affordable and Workforce Housing Reserve Fund with an amount to be determined annually by the Board of Mayor and Alderman; and a Affordable and Workforce Housing Round-Up Ordinance whereby citizens can voluntarily round-up their monthly water utility bills to the next highest dollar. Additionally, the Process Committee is working with the City on two other longer term initiatives that would address barriers in a very substantive way: a new Transfer of Development Rights ordinance and a moderately price dwelling unit ordinance that would promote mixed-income housing developments. The ordinance establishing a moderately priced dwelling unit program was passed and became a part of the City's zoning code in 2010.

high building, impact, and tap fees; land cost and availability; zoning ordinance approval process; lack of incentives in the zoning ordinance; lack of education of why affordable housing is important; lack of "clean" property titles; high rental rates; limited areas for redevelopment, and; not-in-my-backyard attitudes.

HOME/ American Dream Down Payment Initiative (ADDI)

1. Assessment of Relationship of HOME Funds to Goals and Objectives
 - a. Evaluate progress made toward meeting goals for providing affordable housing using HOME funds, including the number and types of households served.
2. HOME Match Report
 - a. Use HOME Match Report HUD-40107-A to report on match contributions for the period covered by the Consolidated Plan program year.
3. HOME MBE and WBE Report
 - a. Use Part III of HUD Form 40107 to report contracts and subcontracts with Minority Business Enterprises (MBEs) and Women's Business Enterprises (WBEs).
4. Assessments
 - a. Detail results of on-site inspections of rental housing.
 - b. Describe the HOME jurisdiction's affirmative marketing actions.
 - c. Describe outreach to minority and women owned businesses.

Program Year 4 CAPER HOME/ADDI response:

The City of Franklin does not receive ADDI funds.

HOMELESS

Homeless Needs

*Please also refer to the Homeless Needs Table in the Needs.xls workbook.

1. Identify actions taken to address needs of homeless persons.
2. Identify actions to help homeless persons make the transition to permanent housing and independent living.
3. Identify new Federal resources obtained from Homeless SuperNOFA.

Program Year 4 CAPER Homeless Needs response:

Actions taken to address the needs of homeless persons

City officials and community volunteers conducted a first ever “pilot” point-in-time count during a night in January 2008. This pilot count was a good trial run and much was learned about the mechanics of doing a count: recruiting volunteers, developing easy to use counting forms, covering the geographic areas of the City, and reporting the findings. In addition, the City recruited agency volunteers and required City departments to maintain a log of homeless encounters during the entire month of January 2008. The point-in-time count was repeated in January 2009, 2011, and 2013 and provided data for the previously discussed Special Needs Assessment.

Actions to help homeless persons make the transition to permanent housing and independent living

At this point in the development of services for homeless persons in the City of Franklin, focus is on working with the few existing providers to get persons in danger of or that are experiencing homelessness into the service system. Receiving Emergency Shelter Grant funds through the State is an important step forward in this effort. In addition, the recently completed Consolidated Plan for 2010-2015 planned to allocate CDBG funds for homeless activities during that consolidated planning period and did in fact allocated funds for the 2011/2012 program year.

Federal Resources obtained from Homeless SuperNOFA

No new resources were obtained from the SuperNOFA

Specific Homeless Prevention Elements

1. Identify actions taken to prevent homelessness.

Program Year 4 CAPER Specific Housing Prevention Elements response:

Actions taken to prevent homelessness

CDBG funds were used during the 2012/2013 program year to assist a local homeless shelter that primarily services domestic violence victims and their families.

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The project is enabling the shelter to provide storage space for household items needs by clients moving out.

The Emergency Shelter Grant funds received from the State and allocated to agencies servicing domestic violence victims and at risk teens directly addresses two groups of persons who otherwise would be likely candidates for recurring episodes of homelessness. The center contains fifteen beds and during the program year the funded activity is to benefit 35 households.

The City also works with two local non-profit organizations on several initiatives that help prevent homelessness. Through the efforts of one agency, funding is available to provide emergency housing in a hotel for up to three nights. During that time, efforts are made to find more stable living arrangements. Transportation may also be provided to Nashville shelters where a larger array of services and resources are available.

Emergency Shelter Grants (ESG)

1. Identify actions to address emergency shelter and transitional housing needs of homeless individuals and families (including significant subpopulations such as those living on the streets).
2. Assessment of Relationship of ESG Funds to Goals and Objectives
 - a. Evaluate progress made in using ESG funds to address homeless and homeless prevention needs, goals, and specific objectives established in the Consolidated Plan.
 - b. Detail how ESG projects are related to implementation of comprehensive homeless planning strategy, including the number and types of individuals and persons in households served with ESG funds.
3. Matching Resources
 - a. Provide specific sources and amounts of new funding used to meet match as required by 42 USC 11375(a)(1), including cash resources, grants, and staff salaries, as well as in-kind contributions such as the value of a building or lease, donated materials, or volunteer time.
4. State Method of Distribution
 - a. States must describe their method of distribution and how it rated and selected its local government agencies and private nonprofit organizations acting as subrecipients.
5. Activity and Beneficiary Data
 - a. Completion of attached Emergency Shelter Grant Program Performance Chart or other reports showing ESGP expenditures by type of activity. Also describe any problems in collecting, reporting, and evaluating the reliability of this information.
 - b. Homeless Discharge Coordination
 - i. As part of the government developing and implementing a homeless discharge coordination policy, ESG homeless prevention funds may be used to assist very-low income individuals and families at risk of becoming homeless after being released from publicly funded institutions such as health care facilities, foster care or other youth facilities, or corrections institutions or programs.

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- c. Explain how your government is instituting a homeless discharge coordination policy, and how ESG homeless prevention funds are being used in this effort.

Program Year 4 CAPER ESG response:

Program Year 4 CAPER ESG response:

The City does not receive ESG funds from the U.S. Department of Housing and Urban Development. The City anticipates continuing to receive State ESG funds as part of their small city entitlement program.

COMMUNITY DEVELOPMENT

Community Development

*Please also refer to the Community Development Table in the Needs.xls workbook.

1. Assessment of Relationship of CDBG Funds to Goals and Objectives
 - a. Assess use of CDBG funds in relation to the priorities, needs, goals, and specific objectives in the Consolidated Plan, particularly the highest priority activities.
 - b. Evaluate progress made toward meeting goals for providing affordable housing using CDBG funds, including the number and types of households served.
 - c. Indicate the extent to which CDBG funds were used for activities that benefited extremely low-income, low-income, and moderate-income persons.
2. Changes in Program Objectives
 - a. Identify the nature of and the reasons for any changes in program objectives and how the jurisdiction would change its program as a result of its experiences.
3. Assessment of Efforts in Carrying Out Planned Actions
 - a. Indicate how grantee pursued all resources indicated in the Consolidated Plan.
 - b. Indicate how grantee provided certifications of consistency in a fair and impartial manner.
 - c. Indicate how grantee did not hinder Consolidated Plan implementation by action or willful inaction.
4. For Funds Not Used for National Objectives
 - a. Indicate how use of CDBG funds did not meet national objectives.
 - b. Indicate how did not comply with overall benefit certification.
5. Anti-displacement and Relocation – for activities that involve acquisition, rehabilitation or demolition of occupied real property
 - a. Describe steps actually taken to minimize the amount of displacement resulting from the CDBG-assisted activities.
 - b. Describe steps taken to identify households, businesses, farms or nonprofit organizations who occupied properties subject to the Uniform Relocation Act or Section 104(d) of the Housing and Community Development Act of 1974, as amended, and whether or not they were displaced, and the nature of their needs and preferences.

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- c. Describe steps taken to ensure the timely issuance of information notices to displaced households, businesses, farms, or nonprofit organizations.
6. Low/Mod Job Activities – for economic development activities undertaken where jobs were made available but not taken by low- or moderate-income persons
 - a. Describe actions taken by grantee and businesses to ensure first consideration was or will be given to low/mod persons.
 - b. List by job title of all the permanent jobs created/retained and those that were made available to low/mod persons.
 - c. If any of jobs claimed as being available to low/mod persons require special skill, work experience, or education, provide a description of steps being taken or that will be taken to provide such skills, experience, or education.
7. Low/Mod Limited Clientele Activities – for activities not falling within one of the categories of presumed limited clientele low and moderate income benefit
 - a. Describe how the nature, location, or other information demonstrates the activities benefit a limited clientele at least 51% of whom are low- and moderate-income.
8. Program income received
 - a. Detail the amount of program income reported that was returned to each individual revolving fund, e.g., housing rehabilitation, economic development, or other type of revolving fund.
 - b. Detail the amount repaid on each float-funded activity.
 - c. Detail all other loan repayments broken down by the categories of housing rehabilitation, economic development, or other.
 - d. Detail the amount of income received from the sale of property by parcel.
9. Prior period adjustments – where reimbursement was made this reporting period for expenditures (made in previous reporting periods) that have been disallowed, provide the following information:
 - a. The activity name and number as shown in IDIS;
 - b. The program year(s) in which the expenditure(s) for the disallowed activity(ies) was reported;
 - c. The amount returned to line-of-credit or program account; and
 - d. Total amount to be reimbursed and the time period over which the reimbursement is to be made, if the reimbursement is made with multi-year payments.
10. Loans and other receivables
 - a. List the principal balance for each float-funded activity outstanding as of the end of the reporting period and the date(s) by which the funds are expected to be received.
 - b. List the total number of other loans outstanding and the principal balance owed as of the end of the reporting period.
 - c. List separately the total number of outstanding loans that are deferred or forgivable, the principal balance owed as of the end of the reporting period, and the terms of the deferral or forgiveness.
 - d. Detail the total number and amount of loans made with CDBG funds that have gone into default and for which the balance was forgiven or written off during the reporting period.

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- e. Provide a List of the parcels of property owned by the grantee or its subrecipients that have been acquired or improved using CDBG funds and that are available for sale as of the end of the reporting period.

11. Lump sum agreements

- a. Provide the name of the financial institution.
- b. Provide the date the funds were deposited.
- c. Provide the date the use of funds commenced.
- d. Provide the percentage of funds disbursed within 180 days of deposit in the institution.

12. Housing Rehabilitation – for each type of rehabilitation program for which projects/units were reported as completed during the program year

- a. Identify the type of program and number of projects/units completed for each program.
- b. Provide the total CDBG funds involved in the program.
- c. Detail other public and private funds involved in the project.

13. Neighborhood Revitalization Strategies – for grantees that have HUD-approved neighborhood revitalization strategies

- a. Describe progress against benchmarks for the program year. For grantees with Federally-designated EZs or ECs that received HUD approval for a neighborhood revitalization strategy, reports that are required as part of the EZ/EC process shall suffice for purposes of reporting progress.

Program Year 4 CAPER Community Development response:

Community Development Responses

Assessment of Relationship of CDBG fund to Goals and Objectives

Other than for program administration, CDBG funds were not used for non-housing community development needs. Housing needs, particularly the rehabilitation of existing owner units and the production of new owner units, were identified in the Consolidated Plan Community Development Table as the high priority needs. As presented elsewhere throughout this report the Emergency Demonstration Rehabilitation Program addresses the need to rehabilitate existing owner occupied housing units, particularly those of elderly homeowners with extremely low and low incomes. The table below shows progress made under the rehab program toward meeting affordable housing goals and how those funds were used to benefit different income groups. The CBDO program, as also discussed in other sections of this report, is targeted to the production/preservation of new owner units.

Emergency Rehabilitation Program 2008-2009 Program Year					
Income	Goal	Accomplishment	Race	Elderly	Family Type
Extremely low income <=30% MFI	5	1 completed	White =1	1 >=55 1=disabled	Small Related =1
<i>[next page]</i> Low income >30 to <=50% MFI	5	4 completed	Black =2 White =2	4 >=55 3=disabled	Small Related =1

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Moderate Income >50 to <=80% MFI	0	0 completed			
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Changes in Program Objectives

This is the third year of the new five year Consolidated Plan and no changes in program objectives have been suggested or implemented. As stated previously in this document four activities/programs funded in the 2012/2013 program year are continuations of previously funding activities/programs and the overall objectives remain relatively consistent.

Assessment of Efforts in Carrying Out Planned Actions

The City has used a variety of resources in undertaking its CDBG and affordable housing initiatives. The Emergency Rehabilitation Program is being operated by a local non-profit organization with experience in community development and affordable housing programs. Their expertise in working with the community, inspecting homes, doing work write-ups, and overseeing the work of building contractors has been invaluable. In doing the homeless counts, volunteers from the community and several local agencies conducted the counts in the early morning hours of a mid-January night. Needs Assessment and the analysis of barriers to affordable housing are ongoing efforts of the Affordable Housing Commission, which is a twenty+ member commission appointed by the Board of Mayor and Alderman and composed of residents, representatives of neighborhood and non-profit organizations, local lenders, the public housing authority, city government, and area builders and developers of housing. The CBDO program is reliant upon the work of certified non-profits to perform housing development activities. The Fair Housing Counseling and Outreach program is operated by another local non-profit service agency certified homeowner counseling and foreclosure counseling. ESG funds from the State of Tennessee are resources available to address homelessness in the City.

The City provides Certifications of Consistency to the Consolidated Plan on a case-by-case basis upon request. Staff reviews the request and assesses whether or not the application is for a program or initiative that is consistent with the goals and objectives of the Consolidated Plan, and whether or not the project is for persons with incomes at or below 80% of the median family income, or for neighborhoods with a majority of households at 80% or less of MFI.

The City is not aware of any actions or willful inactions it has taken to hinder Consolidated Plan implementation.

Funds Not Used for National Objectives

All funds used went to meet a national objective.

Anti-displacement and Relocation

No displacement or relocation occurred on projects funded through the Consolidated Plan programs. The Emergency Rehabilitation Program is minor rehab with a maximum grant of \$15,000.

Low/Mod Job Activities

No economic development activities were funded through the Consolidated Plan programs.

Low/Mod Limited Clientele Activities

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The Emergency Demonstration Rehabilitation Program serviced all low/mod clients. Each rehab case was for a low/moderate income household and household income was certified on an individual case basis. Community Housing Partnership, the CBDO developer of the one funded project, will sell the home located in the Natchez Neighborhood to a qualified low/moderate income buyer for an affordable price. All participating households were certified as having gross incomes below 80% of the median family income using the Section 8/Part 5 definition of annual income.

Program Income received

No program income was received during the 2012-2013 program year.

Prior period adjustments

No prior period adjustments were made during the 2012-2013 program year.

Loans and other receivables

No loans have been made using Consolidated Plan program funds; the City has no outstanding loans from the use of Consolidated Plan program funds. No properties owned by the City or any subrecipient were acquired or improved using CDBG funds.

Lump sum agreements

The City has no lump sum agreements.

Housing Rehabilitation

Emergency Rehabilitation Program	
Participant Income	Units Completed
Extremely low income <=30% MFI	1 completed
Low income >30 to <=50% MFI	4 completed
Moderate Income >50 to <=80% MFI	0 completed

The Emergency Rehabilitation Program in 2011/2012 provided CDBG grants to elderly and/or disabled homeowners with extremely-low and low incomes certified as less than or equal to 50% of the median family income. The program was available to eligible homeowners throughout the City of Franklin and specifically targeted in two low to moderate income neighborhoods, Hard Bargain and Natchez. Maximum grant amounts were for \$15,000. Average household income for the 8 cases completed is \$16,202. Seventy five percent (75%) of households assisted are African-American.

Emergency Rehabilitation Program Budget and Expenditures				
Program	Budgeted Funds	Program Income	Committed Funds	Expended Funds
Emergency Rehabilitation	\$128,308	\$0	\$128,308	\$0

No additional public or private funds were available for this program.

Neighborhood Revitalization Strategies

The City has no HUD approved neighborhood revitalization strategies.

Antipoverty Strategy

1. Describe actions taken during the last year to reduce the number of persons living below the poverty level.

Program Year 4 CAPER Antipoverty Strategy response:

Actions taken to reduce the number of persons living below the poverty level

The overall poverty rate in the City is 6.7% compared to 12.4% in the U.S. and an even higher rate of 13.5% in the State. This relatively low rate of overall poverty in the City, allows it to more focus its program efforts on the neediest groups.

As presented in the Consolidated Plan, the overall poverty rate in the City is 6.7% compared to 12.4% in the U.S. and an even higher rate of 13.5% in the State. This relatively low rate of poverty in the City, allows it to more focus its program efforts on the neediest groups. One group in Franklin whose poverty rate exceeds the national average is the elderly. The Emergency Rehabilitation Program targets help to this group by limiting its reach to homeowners 55 and older, with incomes at or below 50% of MFI. Data in the previous section shows that nearly 38% of the rehab program's completed cases, are helping elderly homeowners with extremely low incomes less than or equal to

30% MFI. Although the poverty rate of African Americans in the City (17.8%) is considerably less than in the U.S. (24.9%) or in the State (25.3%), African-Americans in the City do have poverty rates approaching three-times that for the City as a whole. The two neighborhoods targeted by the Emergency Rehabilitation Program are historic African-American communities; 75% of the households applying for and receiving assistance through the program during the reporting period were African American.

Other actions taken to help persons living below the poverty level, include the homeless counts. These initiatives help quantify a subpopulation that very likely have incomes below the poverty level. The ESG program in the City is also a step in helping stabilize the living arrangements, hopefully promoting greater prosperity, for persons and families experiencing tough economic straits.

NON-HOMELESS SPECIAL NEEDS

Non-homeless Special Needs

*Please also refer to the Non-homeless Special Needs Table in the Needs.xls workbook.

1. Identify actions taken to address special needs of persons that are not homeless but require supportive housing, (including persons with HIV/AIDS and their families).

Program Year 4 CAPER Non-homeless Special Needs response:

Actions taken to address special needs of persons that are not homeless but require supportive housing

Under the Emergency Demonstration Rehabilitation Program, 80% of households assisted were elderly, and 80% of the households receiving assistance had disabled members. The City began the process of collecting data and working with service providers in 2007 to better understand needs. The City appointed an Affordable Housing Commission to study and make recommendations on housing needs in the community. These two steps of beginning to gather data and engaging key community members, including non-profit developers and housing counselors, are necessary building blocks in the process of understanding the housing needs of all citizens. Also noteworthy, the City became a State Emergency Shelter Grant entitlement agency and is contractually working with a local domestic violence shelter and a shelter housing recently incarcerated persons.

Specific HOPWA Objectives

*Please also refer to the HOPWA Table in the Needs.xls workbook.

1. Overall Assessment of Relationship of HOPWA Funds to Goals and Objectives
Grantees should demonstrate through the CAPER and related IDIS reports the progress they are making at accomplishing identified goals and objectives with HOPWA funding. Grantees should demonstrate:
 - a. That progress is being made toward meeting the HOPWA goal for providing affordable housing using HOPWA funds and other resources for persons with HIV/AIDS and their families through a comprehensive community plan;
 - b. That community-wide HIV/AIDS housing strategies are meeting HUD's national goal of increasing the availability of decent, safe, and affordable housing for low-income persons living with HIV/AIDS;
 - c. That community partnerships between State and local governments and community-based non-profits are creating models and innovative strategies to serve the housing and related supportive service needs of persons living with HIV/AIDS and their families;
 - d. That through community-wide strategies Federal, State, local, and other resources are matched with HOPWA funding to create comprehensive housing strategies;
 - e. That community strategies produce and support actual units of housing for persons living with HIV/AIDS; and finally,
 - f. That community strategies identify and supply related supportive services in conjunction with housing to ensure the needs of persons living with HIV/AIDS and their families are met.

2. This should be accomplished by providing an executive summary (1-5 pages) that includes:
 - a. Grantee Narrative
 - i. Grantee and Community Overview
(1) A brief description of your organization, the area of service, the name of each project sponsor and a broad overview of the range/type of housing activities and related services

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- (2) How grant management oversight of project sponsor activities is conducted and how project sponsors are selected
 - (3) A description of the local jurisdiction, its need, and the estimated number of persons living with HIV/AIDS
 - (4) A brief description of the planning and public consultations involved in the use of HOPWA funds including reference to any appropriate planning document or advisory body
 - (5) What other resources were used in conjunction with HOPWA funded activities, including cash resources and in-kind contributions, such as the value of services or materials provided by volunteers or by other individuals or organizations
 - (6) Collaborative efforts with related programs including coordination and planning with clients, advocates, Ryan White CARE Act planning bodies, AIDS Drug Assistance Programs, homeless assistance programs, or other efforts that assist persons living with HIV/AIDS and their families.
- ii. Project Accomplishment Overview
- (1) A brief summary of all housing activities broken down by three types: emergency or short-term rent, mortgage or utility payments to prevent homelessness; rental assistance; facility based housing, including development cost, operating cost for those facilities and community residences
 - (2) The number of units of housing which have been created through acquisition, rehabilitation, or new construction since 1993 with any HOPWA funds
 - (3) A brief description of any unique supportive service or other service delivery models or efforts
 - (4) Any other accomplishments recognized in your community due to the use of HOPWA funds, including any projects in developmental stages that are not operational.
- iii. Barriers or Trends Overview
- (1) Describe any barriers encountered, actions in response to barriers, and recommendations for program improvement
 - (2) Trends you expect your community to face in meeting the needs of persons with HIV/AIDS, and
 - (3) Any other information you feel may be important as you look at providing services to persons with HIV/AIDS in the next 5-10 years
- b. Accomplishment Data
- i. Completion of CAPER Performance Chart 1 of Actual Performance in the provision of housing (Table II-1 to be submitted with CAPER).
 - ii. Completion of CAPER Performance Chart 2 of Comparison to Planned Housing Actions (Table II-2 to be submitted with CAPER).

Program Year 4 CAPER Specific HOPWA Objectives response:

No HOPWA funds are received by the City of Franklin.

OTHER NARRATIVE

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Include any CAPER information that was not covered by narratives in any other section.

Program Year 4 CAPER Other Narrative response: NA