

U.S. Department of Housing and Urban Development

Knoxville Field Office, Region IV John J. Duncan Federal Building 710 Locust Street, Suite 300 Knoxville, Tennessee 37902-2526

July 31, 2019

Kathleen Sauseda, Housing Coordinator Community and Economic Development Office City of Franklin P.O. Box 305 Franklin, TN 7065-0305

Dear Ms. Sauseda:

I am pleased to transmit to you the U.S. Department of Housing and Urban Development's (HUD) approval of the 2019 Consolidated Annual Action Plan for funding under the Community Development Block Grant (CDBG) Program. Your jurisdiction's Program Year (PY) 2019 begins on July 1, 2019, and the available funding for the CDBG Program is \$353,910.

The Department commends the City of Franklin and staff on the efforts which successfully completed this Consolidated Annual Action Plan. The goals and objectives developed through this process will provide and expand the foundation for partnerships at all levels of government with citizens and the private sector, including for profit and nonprofit organizations. These partnerships have proven to be invaluable as you and your partners address the problems of affordable housing, homelessness, community development needs, and economic opportunities for all citizens, particularly for very low- income and low-income persons. In addition, these programs are instrumental as your community and the Nation address pressing housing and economic problems and address the needs of our citizens.

As you know, HUD published a Federal Register Notice on May 18, 2018 which withdrew the Local Government Tool for use by CDBG recipients when preparing and submitting their Assessment of Fair Housing (AFH), thereby delaying the requirement to submit an AFH. Nevertheless, the legal obligation to affirmatively further fair housing continues for all. Until HUD publishes a new Local Government Tool, the AFFH obligation reverts to the submission of the certification of affirmatively furthering fair housing. This means that the jurisdiction is conducting an Analysis of Impediments (AI) to fair housing choice, taking appropriate actions to overcome the effects of any impediments, and keeping records reflecting the analysis and actions. The AI should be updated in accordance with the HUD Fair Housing Planning Guide (1996). Any governments that already have an accepted AFH are not required to conduct a separate AI. The Office of Fair Housing and Equal Opportunity is available to answer any questions you may have regarding this matter. You may contact Zachary D. Blair, Senior Equal Opportunity Specialist at 615.515.8597 or at zachary.d.blair a hud.gov.

A copy of your Consolidated Annual Action Plan was provided to the Department's program offices for review and comments. Any received comments have been either enclosed separately or are contained in the Advice and Guidance, which is an enclosure.



Enclosed are three originals of the Grant Agreements for CDBG Entitlement Program (form HUD 7082), which require the Mayor's or the official designee's signatures. These constitute the contract between HUD and the City of Franklin.

The grant agreement(s) require specific information for those using an Indirect Cost Rate. If funding assistance will be used for payment of indirect costs pursuant to 2 CFR 200, Subpart E-Cost Principles, you are required to enter specific information as instructed. The requirement on Indirect Cost rate is indicated under the Special Conditions, Item 8 (attached) for CDBG. Now, if your jurisdiction is not using an indirect cost rate, you are required to state NO. If your jurisdiction is using an indirect cost rate, then enter the required information as indicated on each grant agreement (Funding Approval). If no answer and/or no information are provided, then the applicable grant agreement(s) are not considered as fully executed and will be returned to your jurisdiction for completion. Also, please be aware that the HUD Field Accounting Center will not process the grant agreements until the required information has been entered on a grant agreement. You are also reminded that HUD funds are drawn down using a grant-based approach in the Integrated Disbursement and Information System (IDIS).

As you know, formula grant funds are governed by the Department, and the management of the Consolidated Plan, including the Consolidated Annual Action Plan is handled by the Office of Community Planning and Development (CPD). I have signed the agreements and applicable funding approval forms. Please retain one set of originals for your records and return the other two sets to CPD as noted below:

U.S. Department of Housing and Urban Development Renee Ryles, Acting Director, CPD John J. Duncan Federal Building, Suite 300 710 Locust Street, SW Knoxville, TN 37902

Failure to execute and return the grant agreements within 60 days of the date of this letter may be considered to constitute rejection of the grant and cause for HUD to determine that the funds are available for reallocation to other grantees. Also, the year- end reporting on 2018 program performance and accomplishments in the Consolidated Annual Performance and Evaluation Report (CAPER) is due to CPD 90 days after the end of the 2018 program year. At this time, no new guidance has been received from our headquarters, and grantees are advised to follow the format used for last year's CAPER reporting and submit the CAPER in IDIS. For submission of other HUD program required reports, please refer to the enclosed Advice and Guidance for instructions. We look forward to working with your jurisdiction to accomplish the goals set forth for your jurisdiction. In the meantime, if you have any questions regarding this letter, please contact Deana Doyle, Financial Analyst, at (865) 474-8250.

Very sincerely yours,

Bener D. Ayles

Renee Ryles, Acting Director Office of Community Planning and Development

Enclosures cc Honorable Ken Moore Mayor of Franklin

U.S. Department of Housing and Urban Development Funding Approval/Agreement Office of Community Planning and Development Title I of the Housing and Community OMB Approval No. 2506-0193 Community Development Block Grant Program Development Act (Public Law 930383) exp 5/31/2018 HI-00515R of 20515R 1. Name of Grantee (as shown in item 5 of Standard Form 424) 3a. Grantee's 9-digit Tax ID Number 3b. Grantee's 9-digit DUNS Number Franklin 626000290 081460768 2. Grantee's Complete Address (as shown in item 5 of Standard Form 424) 4. Date use of funds may begin 109 3Rd Ave S (mm/dd/yyyy) 07/01/2019 Franklin, TN 37064 5a. Project/Grant No. 1 6a Amount Approved B-19-MC-47-0014 \$353,910.00 5b. Project/Grant No. 2 6b. Amount Approved Grant Agreement: This Grant Agreement between the Department of Housing and Urban Development (HUD) and the above named Grantee is made pursuant to the authority of Title I of the Housing and Community Development Act of 1974, as amended, (42 USC 5301 et seq ) The Grantee's submissions for Title I assistance, the HUD regulations at 24 CFR Part 570 (as now in effect and as may be amended from time to time), and this Funding Approval, including any special conditions, constitute part of the Agreement Subject to the provisions of this Grant Agreement, HUD will make the funding assistance specified here available to the Grantee upon execution of the Agreement by the parties. The funding assistance specified in the Funding Approval may be used to pay costs incurred after the date specified in item 4 above provided the activities to which such costs are related are carried out in compliance with all applicable requirements. Pre-agreement costs may not be paid with funding assistance specified here unless they are authorized in HUD regulations or approved by waiver and listed in the special conditions to the Funding Approval The Grantee agrees to assume all of the responsibilities for environmental review, decision making, and actions, as specified and required in regulations issued by the Secretary pursuant to Section 104(g) of Title I and published in 24 CFR Part 58 The Grantee further acknowledges its responsibility for adherence to the Agreement by subrecipient entities to which it makes funding assistance hereunder available U.S. Department of Housing and Urban Development (By Name) Grantee Name (Contractual Organization) Renee Ryles Franklin (City Of Franklin) Title Title Acting CPD Director Signature Date (mm/dd/yyyy) Signature Date (mm/dd/yyyy) 0 07/31/2019 8. Special Conditions 7. Category of Title I Assistance for this Funding Action: 9a. Date HUD Received Submission 10. check one (mm/dd/yyyy) 05/28/2019 (check one) 🖾 a. Orig. Funding Entitlement, Sec 106(b) None Approval 9b. Date Grantee Notified Attached (mm/dd/yyyy) 07/31/2019 D b. Amendment Amendment Number 9c. Date of Start of Program Year (07/01/2019) 11. Amount of Community Development Block Grant FY (2019) FY (2018) FY (2017) a. Funds Reserved for this Grantee \$353,822.00 \$ 88.00 \$ .00 b. Funds now being Approved c. Reservation to be Cancelled (11a minus 11b) 12s. Amount of Loan Guarantee Commitment now being Approved 12b. Name and complete Address of Public Agency City Of Franklin N/A Loan Guarantee Acceptance Provisions for Designated Agencies: 109 3Rd Ave S The public agency hereby accepts the Grant Agreement executed by the Franklin, TN 37064 Department of Housing and Urban Development on the above date with respect to the above grant number(s) as Grantee designated to receive loan 12c. Name of Authorized Official for Designated Public Agency guarantee assistance, and agrees to comply with the terms and conditions of the Agreement, applicable regulations, and other requirements of HUD Title now or hereafter in effect, pertaining to the assistance provided it Signature HUD Accounting use Only Effective Date Batch TAC A Reg Area Document No. Project Number Category Amount (mm/dd/yyyy) F Program Y Project Number Amount Project Number Amount

> Verified By Transaction Code Entered By 24 CFR 570

form HUD-7082 (5/15)

Batch Number

Data Entered PAS (mm/dd/yyyy)

Date Entered LOCCS (mm/dd/yyyy)