

Action Plan

Grantee: Louisville Jefferson County Metro Government, KY

Grant: B-08-MN-21-0001

LOCCS Authorized Amount:	\$ 6,973,721.00
Grant Award Amount:	\$ 6,973,721.00
Status:	Reviewed and Approved
Estimated PI/RL Funds:	\$ 0.00
Total Budget:	\$ 6,973,721.00

Funding Sources

No Funding Sources Found

Narratives

Areas of Greatest Need:

Jefferson County ranks highest among the Commonwealth of Kentucky's 120 counties and the Louisville MSA has been identified as the area with greatest need for assistance to reduce the number of foreclosures. According to the Kentucky Office of the Courts, Louisville/Jefferson County Metro Government (Louisville Metro), ranks highest among statewide jurisdictions with the greatest likelihood of future foreclosure, abandonment and deterioration. According to the Foreclosure and Abandonment Risk scores furnished by HUD, when aggregated to the county level, Louisville Metro was the only county assigned a most distressed score of 100 out of 100 points by the Kentucky Department for Local Government.

The areas of greatest need to be targeted with NSP funds are the Park duValle area (Census Tracts 10, 127.01, and 128.01); Shawnee (Census Tracts 4 and 7); Newburg (Census Tracts 113.01, 114.04, 114.05 and 114.06); and Smoketown/Shelby Park (Census Tracts 62 and 65).

Distribution and and Uses of Funds:

March 2013 Technical Amendment: Louisville Metro Government, through consultation with the local HUD CPD field office, intends to reallocate a portion of its Administration and LISA RENTAL Project funds to the 08-E4-NEW DIRECTIONS HOUSING CORP Activity to help the responsible organization carry out the national objective by occupying their last unit with an NSP eligible beneficiary. Louisville Metro Government determined it would use \$196,810.00 of its Projected 08-F1-Administration Project Budget and \$3,521.83 of its Projected LISA-RENTAL LMHA DEVELOPMENT CORP Project Budget to fund a housing unit in the 08-E4-NEW DIRECTIONS HOUSING CORP Activity within the E2-ACQUISITION-REHAB-HOMEOWNERSHIP Project. Therefore, the 08-F1-Administration Project Budget was reduced from \$697,372.00, down to \$500,562.00. The LISA-RENTAL LMHA DEVELOPMENT CORP Project Budget was reduced from \$2,100,000 down to \$2,096,478.17. The E2-ACQUISITION-REHAB-HOMEOWNERSHIP Project budget was raised from \$2,145,046.69, up to \$2,345,378.52 and the related activity budget from \$622,450.00 up to \$822,781.83. January 2013 Technical Amendment: Under the LISA - Homeownership Project, the project status for all activities had been changed to complete. Although this project is 100% expended, it had not been drawn down 100%, nor was it closed out. During the modification, the status was corrected to underway for all activities under this project. Additionally under the LISA - Homeownership Project, the LISA - Rebound activity had a \$0.00 proposed budget amount. The proposed budget was corrected to the \$158,902.31 amount. Louisville Metro was unable to draw funds down from DRGR in the complete status without a proposed budget. Louisville Metro will be able to draw funds down now. The drawn down amount will match the expended amount by the March 20th, 2013 expenditure deadline, putting Louisville Metro in place to begin closeout on this project soon after. Louisville Metro has never been able to report expenditures under the New Directions Homeownership Activity, under the E2 ACQUISITION-REHAB-HOMEOWNERSHIP Project. Through ongoing efforts, Louisville Metro worked with the local HUD CPD Field Office, NSP-TA providers and the OneCPD DRGR Help Desk, to arrive at a solution in January 2013. Louisville Metro re-associated the Responsible Organization (New Directions Housing) on the second Edit Activity screen in the Action Plan. The box to enter the expenditure amount now appears in the QPR edit mode and the total expenditure



of \$622,450.00 has been saved to the December 2012 QPR prior to submission of the QPR. September 2012 Technical Amendment: Comments on the national objectives for the public facilities activities to Area Benefit. Updated Proposed Accomplishments / Performance measures for all ongoing activities. Revised the River City Housing Homeownership and LISA Activities. One of the LISA - RIVER CITY HOUSING units was mistakenly identified as such under the previous technical amendment. That unit was added back to the 08-E3-RIVER CITY INC ACQUISITION, REHAB AND HOMEOWNERSHIP activity. The budget of those respective activities have been adjusdrngly by \$157,000, the amount of funding for that unit. June 2012 Technical Amendment: Activity Number
Activitytitle

Definitions and Descriptions:

May 2015 Technical Amendment The LISA-RENTAL LMHA DEVELOPMENT CORPORATION activity provides rental housing to 50% AMI households and is the largest share of the Low Income Set Aside expenditures of Metro's NSP allocation. All parties to the activity recognized that the rent received from all units below 50% AMI may not provide adequate revenue to support the long-term viability of the project. Metro therefore, authorized LMHADCO, upon finishing the development and occupying the units with the initial tenants, to transfer ownership of the nine NSP units for a nominal amount to the local public housing agency ("PHA"), the Louisville Metro Housing Authority (LMHA). LMHA has the experience and capacity to operate low income projects and demonstrated the ability to operate this project throughout the Period of Affordability (POA) essentially as part of their Public Housing portfolio. One of the efficiencies LMHA utilizes in their operations is verifying tenant income through an Electronic Income Verification (EIV) system and using the HUD Part 5 Method of determining the income of a tenant. Metro decided to utilize the IRS 1040 method of income determination for their NSP-1 program. Given the position of these properties as both NSP LISA units and a part of the PHA's portfolio, each tenant would have to be certified twice to comply with LMHA's and Metro's policies. Furthermore, Metro does not have access to or permission to see the documentation generated by and used to verify income through the EIV system. To avoid this double duty and make operations more efficient, the parties have consulted with CPD and it has been determined that an acceptable solution is for Metro to change the income certification method for the NSP LISA Rental Activity, through a technical amendment to the Action Plan. Metro is changing the income certification method from the IRS 1040 to Part 5 method for the NSP LISA-RENTAL LMHA DEVELOPMENT CORPORATION Activity through this technical amendment in May of 2015, to move toward the close out of the Activity. Metro will ensure LMHA will certify incomes according to the HUD Part 5 method and maintain proper records by executing an Operating Agreement with LMHA after the Action Plan Amendment is approved by CPD and just prior to the transfer of the property from the developer, Louisville Metro Housing Authority Development Corporation, to LMHA. The Operating Agreement will also obligate LMHA to submit a signed HUD Income Calculator form for all initial occupants, without backup documentation, to Metro, to attest they properly certified household income and properly used, recorded, and managed the source information that cannot be shared (i.e., the EIV report). May 2015 Amendment: In January 2015, Louisville Metro Government made the final payment on expenses incurred on the LISA-RENTAL LMHA DEVELOPMENT CORPORATION activity. The expenditure was being retained until the Development Agreement was amended. Through consultation with the local CPD field office in December 2014, it was determined the amendment was not the solution for moving toward closing out the activity. Instead, Metro would need to execute an Operating Agreement with the Louisville Metro Housing Authority, who will purchase the property and operate it over the remaining life of the affordability period. Since an amended Development Agreement was not needed and the terms for final retainage payment had effectively been met under that existing agreement, Metro made the final payment to move toward closing out the activity. Metro then attempted to draw down the funds from DRGR and was unable to do so. Metro consulted with HUD on determining why the funds could not be drawn. During a monitoring of the NSP-1 Program in March of 2015, CPD provided guidance to Metro to change the status of the LISA-RENTAL LMHA DEVELOPMENT CORPORATION activity to "underway" from the current status of "complete". CPD informed Metro th

Low Income Targeting:

October 2011 Amendment

Louisville Metro anticipates that thirty percent (30%) of NSP funds will be used for projects to be occupied by households whose income does not exceed 50% of area median income, adjusted for household size. This will be accomplished by working closely with the LMHA Development Corporation. Louisville Metro will enter into an amended NSP development agreement with LMHA Development Corporation to acquire nine (9) "vacant" unimproved parcels in the Smoketown Neighborhood, upon which nine (9) single-family homes will be constructed and rented to income qualified households. Subject to the "Dodd-Frank Wall Street Reform and Consumer Protection Act" passed in 2010 redevelopment activities performed under Eligible Use E are now permitted in meeting the NSP-1 Low-Income Set-Aside grant requirement.

Acquisition and Relocation:

October 2011 Amendment:

Louisville Metro estimates the number of low- and moderate-income dwelling units—i.e., 80% of area median income—reasonably expected to be demolished or converted as a direct result of NSP-assisted activities subject this substantial amendment to be zero units.

The number of NSP affordable housing units made available to low-, moderate-, and middle-income households—i.e., 120% of area median income—reasonably expected to be produced by activity and income level as provided for in DRGR, are listed below for all NSP activities that will provide housing. A proposed time schedule for each NSP activity is included in the following activity summary descriptions.

Louisville Metro reasonably expects to produce twenty-six (26) units of affordable housing for low-, moderate-, and middle-income households (LMMI).

Under Eligible Use E, the LMHA Development Corporation will acquire nine (9) unimproved "vacant" properties and construct nine (9) single-family homes for rental to low-income tenants. A total of nine (9) rental housing units for households at or below fifty percent of area median income will be provided under the Low Income Set Aside.

River City Housing and REBOUND will acquire and rehabilitate twelve (12) single-family "foreclosed" or "vacant" properties while New Directions Housing Corporation will acquire four (4) properties and construct five (5) new homes to be sold to owner-occupants.

Louisville Metro estimates that approximately nine (9) units are reasonably expected to be made available for households whose income does not exceed 50 percent of area median income.



Public Comment:

October 2011 Amendment - No public comments received.

Summary of Public Comments on the
Amendment to the NSP Substantial Amendment
ACCEPTED COMMENTS

Comment: Debra Mercer

Ms. Mercer brought to the attention of Louisville Metro Department of Housing and Family Services (LMHFS), NSP program staff, an error contained in the major revision to the NSP Substantial Amendment. Specifically, there was a citation in the amendment listing Census Tract 62 as being Portland instead of Smoketown/Shelby Park.

Response: LMHFS has made the correction and appreciates the careful review by our external partners.

Comment: Joe Gliessner, New Directions Housing Corporation

New Directions Housing Corporation (NDHC) expressed appreciation for being one of the non-profit developers selected to carry out NSP activities and expressed support of the overall plan specifically highlighting its confidence in its ability to administer NSP activities in the Shelby Park Neighborhood. NDHC reiterated the importance of homeownership assistance, expressed commitment to the timeframe and expressed a desire to quickly finalize developer agreements as ample NSP-eligible properties have been identified.

Response: LMHFS agrees and will work to quickly finalize developer agreements.

Comment: Jonathan Lowe, River City Housing Board Member

Mr. Lowe expressed appreciation for LMHFS recognizing the capacity and proven track record of River City Housing Corporation, evident by the selection of this organization to carry out NSP activities, and expressed support of the overall plan.

Response: LMHFS agrees.

Comment: Tim Barry, Louisville Metro Housing Authority (LMHA)

LMHA expressed appreciation for being one of the non-profit developers selected to carry out NSP activities in an effort to increase affordable rental and homeownership opportunities and expressed support of the neighborhood specific strategy of the NSP program. LMHA expressed confidence and assurance regarding its capacity to undertake the activities in the given timeframe, citing its success with the Clarksdale/Liberty Green project.

Response: LMHFS agrees.

Comment: Christie McCravy, Louisville Urban League (REBOUND, Inc.)

Ms. McCravy expressed appreciation for being one of the non-profit developers selected to carry out NSP activities, specifically citing REBOUND's enthusiasm over the development of two homes in the Hallmark and Shawnee neighborhoods.

Response: LMHFS agrees.

Comment: Chris Posey

Response: Mr. Posey expressed his opposition to the major revisions to the NSP Substantial Amendment and to the entire NSP process. Specifically, Mr. Posey is opposed to the selection of the non-profit developers chosen to administer NSP activities, as the procurement process was not open bidding, as was included in the original NSP Substantial Amendment. Mr. Posey further cites concerns that the developers were chosen in an exclusionary and subjective manner due to LMHFS's inability to administer the NSP program in a timely manner. What's more, Mr. Posey states that the process has excluded minority owned and operated entities, with the exception of the Louisville Urban League, which has not been engaged in housing rehabilitation for several years.

Response: While the original NSP Substantial Amendment included a procurement process, it became apparent that due to the NSP timeline for expenditures of grant funds that LMHFS would not have time to undertake a type of procurement process it had never used before and that teaming with established partners with proven capacity to undertake the activities allowed for under the grant was more prudent. The amendment process contained in the Consolidated Plan allows for entitlement communities to adapt its programs to changing circumstances.



Project Summary

Project #	Project Title	Grantee Activity #	Activity Title
9999	Restricted Balance		<i>No activities in this project</i>
A	Shawnee		<i>No activities in this project</i>
B	Portland		<i>No activities in this project</i>
B- Acquisition-Rehab	Homebuyer Choice Program		<i>No activities in this project</i>
C	Smoketown/Shelby Park		<i>No activities in this project</i>
D	Park DuValle		<i>No activities in this project</i>
E	Newburg		<i>No activities in this project</i>
E-Redevelopment	Developer Request For Proposals		<i>No activities in this project</i>
E1	ACQUISITION-REHAB-PUBLIC	08-E1-YOUTHBUILD	ACQUISITION, REHAB AND PUBLIC FACILITY
		08-E2-HABITAT FOR HUMANITY	
E2	ACQUISITION-REHAB-	08-E3-RIVER CITY INC	ACQUISITION, REHAB AND HOMEOWNERSHIP
		08-E4-NEW DIRECTIONS HOUSING CORP	
		08-E5-REBOUND INC	ACQUISITION, REHAB, AND HOMEOWNERSHIP
E3	RIVER CITY HOUSING, INC		<i>No activities in this project</i>
E4	NEW DIRECTIONS HOUSING		<i>No activities in this project</i>
E5	REBOUND		<i>No activities in this project</i>
F	Administration	08-F1-ADMINSTRATION	ADMINISTRATION
LISA - RESALE	LISA - HOMEOWNERSHIP	12 - E4 - LISA - REHAB/RESALE	LISA - NEW DIRECTIONS HOUSING CORPORATION
		12 - E5 - LISA - REHAB/RESALE	LISA - REBOUND
		12- E3 - LISA - REHAB/RESALE	LISA - RIVER CITY HOUSING
LISA-RENTAL	LMHA DEVELOPMENT	11-E-LH25-LMHA DEVELOPMENT CORPORATION	LOW INCOME SET ASIDE ACQ, NEW CONSTRUCT AND RENTAL



Activities

Project # / Title: E1 / ACQUISITION-REHAB-PUBLIC FACILITY

Grantee Activity Number: 08-E1-YOUTHBUILD
Activity Title: ACQUISITION, REHAB AND PUBLIC FACILITY

Activity Type:
Acquisition, construction, reconstruction of public facilities

Project Number:
E1

Projected Start Date:
07/01/2010

Project Draw Block by HUD:
Not Blocked

Activity Draw Block by HUD:
Not Blocked

Block Drawdown By Grantee:
Not Blocked

National Objective:
LMMI: Low, Moderate and Middle Income National Objective for NSP Only

Activity Status:
Completed

Project Title:
ACQUISITION-REHAB-PUBLIC FACILITY

Projected End Date:
12/31/2011

Project Draw Block Date by HUD:

Activity Draw Block Date by HUD:

Total Budget: \$ 750,000.00

Most Impacted and Distressed Budget: \$ 0.00

Other Funds: \$ 0.00

Total Funds: \$ 750,000.00

Benefit Report Type:
Direct (Person)

Proposed Beneficiaries	Total	Low	Mod	Low/Mod%
# of Persons	694060		422785	60.91

Proposed Accomplishments	Total
# of Non-business Organizations benefitting	
# of public facilities	1
# of buildings (non-residential)	1
# of Properties	1



Activity is being carried out by Grantee:

No

Activity is being carried out through:

Organization carrying out Activity:

YOUTHBUILD LOUISVILLE

Proposed budgets for organizations carrying out Activity:

Responsible Organization	Organization Type	Proposed Budget
YOUTHBUILD LOUISVILLE	Non-Profit	\$ 750,000.00

Location Description:

CENSUS TRACT #62-SMOKETOWN NEIGHBORHOOD

The Youthbuild Public Facility is located on 812 South Preston Street, Louisville, KY 40203. The target service area is the entire consolidated city-county of Louisville-Jefferson County, Kentucky. CSR used HUD provided census data to determine the percentage of the entire jurisdiction of the consolidated city-county of Louisville-Jefferson County, Kentucky that met the NSP requirement of 51% of the residents being at or below 120% of the Area Median Income (AMI). The HUD provided census data used was the LM 120 file for the state of KY on the Neighborhood Stabilization Program Targeting – Data Set. CSR used the data to calculate the total number of persons below 120% AMI in Jefferson County to be 422,785 and the total number of persons in the Jefferson County to be 694,060. Those figures show 61% of the total population of the consolidated city-county of Louisville-Jefferson County falls at or below 120% AMI, therefore, this activity have met the LMMA National Objective. Louisville Metro has been unable to properly report this in DRGR under Area Benefit other Bill Kubal from the HUD OneCPD Resource Exchange has explained the other grantees were having similar issues. HUD OneCPD Resource Exchange advisors have yet to resolve the issue and have recommended to continue using the Direct Benefit option and explain how we determined the LMMA beneficiary percentage in the narrative. Louisville Metro was further instructed to report the number of persons at or below 120% AMI under the "Mod" column for now.

Activity Description:

THIS ACTIVITY WILL MEET THE NATIONAL OBJECTIVE, BENEFITTING LOW AND MODERATE INCOME PERSONS BY SERVING A LIMITED CLIENTELE WHOSE INCOME ARE AT OR BELOW 80 PERCENT OF AREA MEDIAN INCOME THRU THE ACQUISITION, REHABILITATION AND NEW CONSTRUCTION OF ITS PROGRAMMATIC AND ADMINISTRATIVE HEADQUARTERS

THE RESPONSIBLE ORGANIZATION PROVIDES TRAINING AND EDUCATION PROGRAMS THAT OFFER GED COMPLETION COURSES AND PREPARATION FOR EMPLOYMENT IN CONSTRUCTION TRADES. THE FACILITY WILL PROVIDE A CENTRALIZED LOCATION FOR OPERATIONS THEREBY REDUCING RESOURCES AND TIME REQUIRED TO MANAGE LOGISTICAL CHALLENGES. ADDITIONAL SPACE FROM CREATING A GREEN-CAMPUS WILL ALLOW THE ORGANIZATION TO ACCOMMODATE MORE PARTICIPANTS AND EXPAND INTO OTHER TRAINING OPPORTUNITIES FOR ADULTS. YOUTHBUILD LOUISVILLE AVERAGES 40 YOUNG ADULT PARTICIPANTS IN THE FULL-TIME ELEVEN MONTH PROGRAM AND 50 YOUNG ADULT PARTICIPANTS IN THE PART-TIME SUMMER PROGRAM. YOUTHBUILD EXPECTS TO DOUBLE THE NUMBER OF PERSONS SERVED IN THE FULL-TIME AND PART-TIME PROGRAMS. YOUTHBUILD ALSO PLANS TO BEGIN OFFERING ONGOING TRAINING OPPORTUNITIES IN GREEN CONSTRUCTION PROFESSIONAL TRADES FOR APPROX 25 TO 150 LOW AND MODERAT INCOME ADULTS

Environmental Assessment: COMPLETED

Environmental Reviews: None



Grantee Activity Number: 08-E2-HABITAT FOR HUMANITY
Activity Title: ACQUISITION, REHAB AND PUBLIC FACILITY

Activity Type:

Acquisition, construction, reconstruction of public facilities

Project Number:

E1

Projected Start Date:

07/01/2010

Project Draw Block by HUD:

Not Blocked

Activity Draw Block by HUD:

Not Blocked

Block Drawdown By Grantee:

Not Blocked

National Objective:

LMMI: Low, Moderate and Middle Income National Objective for NSP Only

Activity Status:

Completed

Project Title:

ACQUISITION-REHAB-PUBLIC FACILITY

Projected End Date:

12/31/2011

Project Draw Block Date by HUD:

Activity Draw Block Date by HUD:

Total Budget: \$ 750,000.00

Most Impacted and Distressed Budget: \$ 0.00

Other Funds: \$ 0.00

Total Funds: \$ 750,000.00

Benefit Report Type:

Direct (Person)

Proposed Beneficiaries

of Persons

Total	Low	Mod	Low/Mod%
694060		422785	60.91

Proposed Accomplishments

of Non-business Organizations benefitting

of public facilities

of buildings (non-residential)

of Properties

Total

1

1

1

Activity is being carried out by Grantee:

No

Activity is being carried out through:

Organization carrying out Activity:

HABITAT FOR HUMANITY OF METRO LOUISVILLE

Proposed budgets for organizations carrying out Activity:

Responsible Organization

HABITAT FOR HUMANITY OF METRO LOUISVILLE

Organization Type

Non-Profit

Proposed Budget

\$ 750,000.00



Location Description:**CENSUS TRACT #23-PORTLAND NEIGHBORHOOD**

The Habitat for Humanity Public Facility is located on 1620 Bank St, Louisville, KY 40203. The target service area is the entire consolidated city-county of Louisville-Jefferson County, Kentucky. CSR used HUD provided census data to determine the percentage of the entire jurisdiction of the consolidated city-county of Louisville-Jefferson County, Kentucky that met the NSP requirement of 51% of the residents being at or below 120% of the Area Median Income (AMI). The HUD provided census data used was the LM 120 file for the state of KY on the Neighborhood Stabilization Program Targeting – Data Set. CSR used the data to calculate the total number of persons below 120% AMI in Jefferson County to be 422,785 and the total number of persons in the Jefferson County to be 694,060. Those figures show 61% of the total population of the consolidated city-county of Louisville-Jefferson County falls at or below 120% AMI, therefore, this activity have met the LMMA National Objective. Louisville Metro has been unable to properly report this in DRGR under Area Benefit other Bill Kubal from the HUD OneCPD Resource Exchange has explained the other grantees were having similar issues. HUD OneCPD Resource Exchange advisors have yet to resolve the issue and have recommended to continue using the Direct Benefit option and explain how we determined the LMMA beneficiary percentage in the narrative. Louisville Metro was further instructed to report the number of persons at or below 120% AMI under the "Mod" column for now.

Activity Description:

THIS ACTIVITY WILL MEET THE NATIONAL OBJECTIVE BENEFITTING LOW, AND MODERATE INCOME PERSONS BY SERVING A LIMITED CLIENTELE WHOSE INCOME ARE AT OR BELOW 80 PERCENT OF AREA MEDIAN INCOME THRU THE ACQUISITION, REHABILITATION. NSP FUNDS FOR PHASE 1 (ACQUISITION OF TWO BUILDINGS, PARTIAL REHAB OF ONE).

THE RESPONSIBLE ORGANIZATION SPECIALIZES IN PRODUCTION AND FINANCING OF SINGLE-FAMILY HOMEOWNERSHIP OPPORTUNTIES FOR LOW AND MODERATE INCOME HOUSEHOLDS. THE FACILITY WILL PROVIDE A CENTRALIZED LOCATION FOR OPERATIONS THEREBY REDUCING RESOURCES AND TIME REQUIRED TO MANAGE LOGISTICAL CHALLENGES. ADDITIONAL SPACE FROM CREATING A CENTRALIZED HEADQUARTERS WILL ALLOW THE "RESTORE" LINE OF BUSINESS TO EXPAND OPERATIONAL CAPACITY AND INCREASE REVENUES OVER TIME. THESE REVENUES WILL BE UTILIZED TO REACH A GOAL OF CONSTRUCTING 300 NEW HOMES BY THE YEAR 2019. CURRENT ANNUAL PRODUCTION IS APPROX 25 HOMES PER YEAR WITH AN AVERAGE OF 35 FAMILIES PARTICIPATING THROUGHOUT THE PIPELINE. BY THE COMPLETION OF PHASE 1,2, AND 3 HABITAT FOR HUMANITY OF METRO LOUISVILLE ANTICIPATES ANNUAL GROWTH IN PRODUCTION AND PARTICIPATION OF APPROX 10

Environmental Assessment: COMPLETED

Environmental Reviews: None

Project # / Title: E2 / ACQUISITION-REHAB-HOMEOWNERSHIP

Grantee Activity Number: 08-E3-RIVER CITY INC
Activity Title: ACQUISITION, REHAB AND HOMEOWNERSHIP

Activity Type:
 Rehabilitation/reconstruction of residential structures

Activity Status:
 Completed

Project Number:
 E2

Project Title:
 ACQUISITION-REHAB-HOMEOWNERSHIP



Projected Start Date:

07/01/2010

Projected End Date:

03/20/2013

Project Draw Block by HUD:

Not Blocked

Project Draw Block Date by HUD:**Activity Draw Block by HUD:**

Not Blocked

Activity Draw Block Date by HUD:**Block Drawdown By Grantee:**

Not Blocked

Total Budget: \$ 1,056,050.00**National Objective:**

LMMI: Low, Moderate and Middle Income National Objective for NSP Only

Most Impacted and Distressed Budget: \$ 0.00**Other Funds:** \$ 0.00**Total Funds:** \$ 1,056,050.00**Benefit Report Type:**

Direct (Households)

Proposed Beneficiaries

	Total	Low	Mod	Low/Mod%
# Owner Households	7		7	100.00
# of Households	7		7	100.00

Proposed Accomplishments

	Total
# of Singlefamily Units	7
# of Housing Units	7
# ELI Households (0-30% AMI)	
Activity funds eligible for DREF (Ike Only)	
#Units ζ other green	
#Units deconstructed	
#Sites re-used	7
#Units exceeding Energy Star	
#Units with bus/rail access	7
#Low flow showerheads	11
#Low flow toilets	13
#Units with solar panels	
#Dishwashers replaced	7
#Clothes washers replaced	7
#Refrigerators replaced	7
#Light fixtures (outdoors) replaced	16



#Light Fixtures (indoors) replaced	93
#Replaced hot water heaters	7
#Replaced thermostats	7
#Efficient AC added/replaced	7
#High efficiency heating plants	7
#Additional Attic/Roof Insulation	7
#Energy Star Replacement Windows	44
# of Properties	7

Activity is being carried out by Grantee:

No

Activity is being carried out through:

Organization carrying out Activity:

RIVER CITY HOUSING INC.

Proposed budgets for organizations carrying out Activity:

Responsible Organization	Organization Type	Proposed Budget
RIVER CITY HOUSING INC.	Non-Profit	\$ 1,056,050.00

Location Description:

AREA ADJACENT PARK DUVALLE(CT 10,127.01,128.01); SHAWNEE (CT 4,7); PORTLAND (CT 3,21,23); SMOKETOWN/SHELBY PARK(CT 62,65); NEWBURG (CT 113.01,114.04,114.05,114.06)

Activity Description:

NONPROFIT DEVELOPER WHO WILL ACQUIRE AND REHABILITATE PROPERTIES FOR EVENTUAL SALE TO LOW, MIDDLE AND MODERATE INCOME HOMEBUYERS

Environmental Assessment: COMPLETED

Environmental Reviews: None



Grantee Activity Number: 08-E4-NEW DIRECTIONS HOUSING CORP
Activity Title: ACQUISITION, REHAB AND HOMEOWNERSHIP

Activity Type:
 Rehabilitation/reconstruction of residential structures

Project Number:
 E2

Projected Start Date:
 07/01/2010

Project Draw Block by HUD:
 Not Blocked

Activity Draw Block by HUD:
 Not Blocked

Block Drawdown By Grantee:
 Not Blocked

National Objective:
 LMMI: Low, Moderate and Middle Income National Objective for NSP Only

Activity Status:
 Completed

Project Title:
 ACQUISITION-REHAB-HOMEOWNERSHIP

Projected End Date:
 03/20/2013

Project Draw Block Date by HUD:

Activity Draw Block Date by HUD:

Total Budget: \$ 822,781.83

Most Impacted and Distressed Budget: \$ 0.00

Other Funds: \$ 0.00

Total Funds: \$ 822,781.83

Benefit Report Type:
 Direct (Households)

Proposed Beneficiaries	Total	Low	Mod	Low/Mod%
# Owner Households	4		2	50.00
# of Households	4		2	50.00

Proposed Accomplishments	Total
# of Singlefamily Units	4
# of Housing Units	4
# ELI Households (0-30% AMI)	
Activity funds eligible for DREF (Ike Only)	
#Units ζ other green	
#Units deconstructed	
#Sites re-used	
#Units exceeding Energy Star	4
#Units with bus/rail access	4
#Low flow showerheads	8
#Low flow toilets	8
#Units with solar panels	
#Dishwashers replaced	4
#Clothes washers replaced	4
#Refrigerators replaced	4
#Light fixtures (outdoors) replaced	8



#Light Fixtures (indoors) replaced	45
#Replaced hot water heaters	4
#Replaced thermostats	4
#Efficient AC added/replaced	4
#High efficiency heating plants	4
#Additional Attic/Roof Insulation	4
#Energy Star Replacement Windows	40
# of Properties	4

Activity is being carried out by Grantee:

No

Activity is being carried out through:

Organization carrying out Activity:

NEW DIRECTIONS HOUSING CORPORATION

Proposed budgets for organizations carrying out Activity:

Responsible Organization	Organization Type	Proposed Budget
NEW DIRECTIONS HOUSING CORPORATION	Non-Profit	\$ 822,781.83

Location Description:

AREAS ADJACENT PARK DUVALLE(CT 10,127.01,128.01); SHAWNEE (CT 4,7); PORTLAND (CT 3,21,23); SMOKETOWN, SHELBY PARK (CT 62,65); NEWBURG(CT 113.01,114.04,114.05,114.06)

Activity Description:

NONPROFIT DEVELOPERS WHO WILL ACQUIRE VACANT PROPERTIES FOR NEW CONSTRUCTION OR REHABILITATION FOR EVENTUAL SALE TO LOW, MIDDLE AND MODERATE INCOME HOMEBUYERS.

Louisville Metro Government, through consultation with the local HUD CPD field office, intends to reallocate Administration and LISA RENTAL funds to the 08-E4-NEW DIRECTIONS HOUSING CORP Activity to help the responsible organization carry out the national objective by occupying their last unit with an NSP eligible beneficiary. The E2-ACQUISITION-REHAB-HOMEOWNERSHIP Project budget was raised from \$2,145,046.69, up to \$2,345,046.69 and the related 08-E4-NEW DIRECTIONS HOUSING CORP Activity Budget was raised from \$622,450.00 up to \$822,781.83.

Environmental Assessment: COMPLETED

Environmental Reviews: None



Grantee Activity Number: 08-E5-REBOUND INC
Activity Title: ACQUISITION, REHAB, AND HOMEOWNERSHIP

Activity Type:
 Rehabilitation/reconstruction of residential structures

Project Number:
 E2

Projected Start Date:
 07/01/2010

Project Draw Block by HUD:
 Not Blocked

Activity Draw Block by HUD:
 Not Blocked

Block Drawdown By Grantee:
 Not Blocked

National Objective:
 LMMI: Low, Moderate and Middle Income National Objective for NSP Only

Activity Status:
 Completed

Project Title:
 ACQUISITION-REHAB-HOMEOWNERSHIP

Projected End Date:
 03/20/2013

Project Draw Block Date by HUD:

Activity Draw Block Date by HUD:

Total Budget: \$ 466,546.69

Most Impacted and Distressed Budget: \$ 0.00

Other Funds: \$ 0.00

Total Funds: \$ 466,546.69

Benefit Report Type:
 Direct (Households)

Proposed Beneficiaries	Total	Low	Mod	Low/Mod%
# Owner Households	3		3	100.00
# of Households	3		3	100.00

Proposed Accomplishments	Total
# of Singlefamily Units	3
# of Housing Units	3
# ELI Households (0-30% AMI)	
Activity funds eligible for DREF (Ike Only)	
#Units ζ other green	
#Units deconstructed	
#Sites re-used	3
#Units exceeding Energy Star	
#Units with bus/rail access	3
#Low flow showerheads	6
#Low flow toilets	8
#Units with solar panels	
#Dishwashers replaced	3
#Clothes washers replaced	
#Refrigerators replaced	3
#Light fixtures (outdoors) replaced	5



#Light Fixtures (indoors) replaced	30
#Replaced hot water heaters	3
#Replaced thermostats	3
#Efficient AC added/replaced	3
#High efficiency heating plants	3
#Additional Attic/Roof Insulation	3
#Energy Star Replacement Windows	33
# of Properties	3

Activity is being carried out by Grantee:

No

Activity is being carried out through:

Organization carrying out Activity:

REBOUND, INC

Proposed budgets for organizations carrying out Activity:

Responsible Organization	Organization Type	Proposed Budget
REBOUND, INC	Non-Profit	\$ 625,449.00

Location Description:

AREAS ADJACENT PARK DUVALLE(CT 10,127.01,128.01); SHAWNEE (CT 4,7); PORTLAND (CT 3,21,23); SMOKETOWN/SHELBY PARK(CT 62,65); NEWBURG (CT 113.01,114.04,114.05,114.06)

Activity Description:

NONPROFIT DEVELOPERS WHO WILL ACQUIRE AND REHABILITATE PROPERTIES FOR EVENTUAL SALE TO LOW, MODERATE, AND MIDDLE INCOME HOMEBUYERS.

Environmental Assessment: COMPLETED

Environmental Reviews: None

Project # / Title: F / Administration

Grantee Activity Number: 08-F1-ADMINISTRATION

Activity Title: ADMINISTRATION

Activity Type:

Activity Status:



Administration

Project Number:

F

Projected Start Date:

01/01/2009

Project Draw Block by HUD:

Not Blocked

Activity Draw Block by HUD:

Not Blocked

Block Drawdown By Grantee:

Not Blocked

National Objective:

LMMI: Low, Moderate and Middle Income National Objective for NSP Only

Benefit Report Type:

NA

Completed

Project Title:

Administration

Projected End Date:

03/20/2013

Project Draw Block Date by HUD:

Activity Draw Block Date by HUD:

Total Budget: \$ 500,562.00

Most Impacted and Distressed Budget: \$ 0.00

Other Funds: \$ 0.00

Total Funds: \$ 500,562.00

Activity is being carried out by Grantee:

Yes

Activity is being carried out through:

Grantee Employees

Organization carrying out Activity:

Louisville Metro Department of Housing and Family Services

Proposed budgets for organizations carrying out Activity:

Responsible Organization

Louisville Metro Department of Housing and Family Services

Organization Type

Unknown

Proposed Budget

\$ 500,562.00

Location Description:

Neighborhoods and concentrated areas located within the low and moderate census tracts referred to in the substantial amendment.

Activity Description:

Administration activities to support NSP implementation.



Louisville Metro Government, through consultation with the local HUD CPD field office, intends to use \$196,810.00 of its Projected 08-F1-Administration Project Budget on the E2-ACQUISITION-REHAB-HOMEOWNERSHIP Project. The 08-F1-Administration Project Budget was reduced from \$697,372.00, down to \$500,562.00.

Environmental Assessment: EXEMPT

Environmental Reviews: None

Project # / Title: LISA - RESALE / LISA - HOMEOWNERSHIP

Grantee Activity Number: 12 - E4 - LISA - REHAB/RESALE
Activity Title: LISA - NEW DIRECTIONS HOUSING CORPORATION

Activity Type:
 Rehabilitation/reconstruction of residential structures

Project Number:
 LISA - RESALE

Projected Start Date:
 07/01/2010

Project Draw Block by HUD:
 Not Blocked

Activity Draw Block by HUD:
 Not Blocked

Block Drawdown By Grantee:
 Not Blocked

National Objective:
 LH25: Funds targeted for housing for households whose incomes are at or under 50% Area Median Income.

Benefit Report Type:
 Direct (Households)

Activity Status:
 Completed

Project Title:
 LISA - HOMEOWNERSHIP

Projected End Date:
 03/20/2013

Project Draw Block Date by HUD:

Activity Draw Block Date by HUD:

Total Budget: \$ 203,000.00

Most Impacted and Distressed Budget: \$ 0.00

Other Funds: \$ 0.00

Total Funds: \$ 203,000.00

Proposed Beneficiaries	Total	Low	Mod	Low/Mod%
# Owner Households	1	1		100.00
# of Households	1	1		100.00



Proposed Accomplishments	Total
# of Singlefamily Units	1
# of Housing Units	1
# ELI Households (0-30% AMI)	
Activity funds eligible for DREF (Ike Only)	
#Units ζ other green	
#Units deconstructed	
#Sites re-used	1
#Units exceeding Energy Star	1
#Units with bus/rail access	1
#Low flow showerheads	2
#Low flow toilets	2
#Units with solar panels	
#Dishwashers replaced	1
#Clothes washers replaced	1
#Refrigerators replaced	1
#Light fixtures (outdoors) replaced	2
#Light Fixtures (indoors) replaced	12
#Replaced hot water heaters	1
#Replaced thermostats	1
#Efficient AC added/replaced	1
#High efficiency heating plants	1
#Additional Attic/Roof Insulation	1
#Energy Star Replacement Windows	10
# of Properties	1

Activity is being carried out by Grantee:

No

Activity is being carried out through:

Organization carrying out Activity:

NEW DIRECTIONS HOUSING CORPORATION

Proposed budgets for organizations carrying out Activity:

Responsible Organization	Organization Type	Proposed Budget
NEW DIRECTIONS HOUSING CORPORATION	Non-Profit	\$ 203,000.00

Location Description:

Area of greatest need identified in 2008 included AREAs ADJACENT PARK DUVALLE(CT 10,127.01,128.01); SHAWNEE (CT 4,7); PORTLAND (CT 3,21,23); SMOKETOWN/SHELBY PARK(CT 62,65); NEWBURG (CT 113.01,114.04,114.05,114.06). One unit was located in the Shelby Park neighborhood.

Activity Description:



NONPROFIT DEVELOPER WHO WILL ACQUIRE AND REHABILITATE PROPERTIES FOR EVENTUAL SALE TO LOW INCOME HOMEBUYERS.

New Directions Housing Corporation completed one unit which sold to a household below 50% Area Median Income. Performance measures reported as "replaced" are interpreted as "added" for this unit, as it was newly constructed.

Environmental Assessment: COMPLETED

Environmental Reviews: None

Grantee Activity Number: 12 - E5 - LISA - REHAB/RESALE
Activity Title: LISA - REBOUND

Activity Type:

Rehabilitation/reconstruction of residential structures

Project Number:

LISA - RESALE

Projected Start Date:

07/01/2010

Project Draw Block by HUD:

Not Blocked

Activity Draw Block by HUD:

Not Blocked

Block Drawdown By Grantee:

Not Blocked

National Objective:

LH25: Funds targeted for housing for households whose incomes are at or under 50% Area Median Income.

Activity Status:

Completed

Project Title:

LISA - HOMEOWNERSHIP

Projected End Date:

03/20/2013

Project Draw Block Date by HUD:

Activity Draw Block Date by HUD:

Total Budget: \$ 158,902.31

Most Impacted and Distressed Budget: \$ 0.00

Other Funds: \$ 0.00

Total Funds: \$ 158,902.31

Benefit Report Type:

Direct (Households)

Proposed Beneficiaries

	Total	Low	Mod	Low/Mod%
# Owner Households	1	1		100.00
# of Households	1	1		100.00

Proposed Accomplishments

	Total
# of Singlefamily Units	1
# of Housing Units	1
# ELI Households (0-30% AMI)	
Activity funds eligible for DREF (Ike Only)	
#Units ζ other green	
#Units deconstructed	
#Sites re-used	1
#Units exceeding Energy Star	
#Units with bus/rail access	1
#Low flow showerheads	2
#Low flow toilets	1
#Units with solar panels	
#Dishwashers replaced	1
#Clothes washers replaced	
#Refrigerators replaced	1
#Light fixtures (outdoors) replaced	2



#Light Fixtures (indoors) replaced	9
#Replaced hot water heaters	1
#Replaced thermostats	1
#Efficient AC added/replaced	1
#High efficiency heating plants	1
#Additional Attic/Roof Insulation	1
#Energy Star Replacement Windows	8
# of Properties	1

Activity is being carried out by Grantee:

No

Activity is being carried out through:

Organization carrying out Activity:

REBOUND, INC

Proposed budgets for organizations carrying out Activity:

Responsible Organization	Organization Type	Proposed Budget
REBOUND, INC	Non-Profit	\$ 158,902.31

Location Description:

One unit was located in the Shawnee neighborhood.

Area of greatest need identified in 2008 included AREAs ADJACENT PARK DUVALLE(CT 10,127.01,128.01); SHAWNEE (CT 4,7); PORTLAND (CT 3,21,23); SMOKETOWN/SHELBY PARK(CT 62,65); NEWBURG (CT 113.01,114.04,114.05,114.06).

Activity Description:

NONPROFIT DEVELOPER WHO WILL ACQUIRE AND REHABILITATE PROPERTIES FOR EVENTUAL SALE TO LOW INCOME HOMEBUYERS.

REBOUND, Inc. completed one unit which sold to a household below 50% Area Median Income.

Environmental Assessment: COMPLETED

Environmental Reviews: None



Grantee Activity Number: 12- E3 - LISA - REHAB/RESALE
Activity Title: LISA - RIVER CITY HOUSING

Activity Type:

Rehabilitation/reconstruction of residential structures

Project Number:

LISA - RESALE

Projected Start Date:

07/01/2010

Project Draw Block by HUD:

Not Blocked

Activity Draw Block by HUD:

Not Blocked

Block Drawdown By Grantee:

Not Blocked

National Objective:

LH25: Funds targeted for housing for households whose incomes are at or under 50% Area Median Income.

Activity Status:

Completed

Project Title:

LISA - HOMEOWNERSHIP

Projected End Date:

03/20/2013

Project Draw Block Date by HUD:

Activity Draw Block Date by HUD:

Total Budget: \$ 169,400.00

Most Impacted and Distressed Budget: \$ 0.00

Other Funds: \$ 0.00

Total Funds: \$ 169,400.00

Benefit Report Type:

Direct (Households)

Proposed Beneficiaries

	Total	Low	Mod	Low/Mod%
# Owner Households	1	1		100.00
# of Households	1	1		100.00

Proposed Accomplishments

	Total
# of Singlefamily Units	1
# of Housing Units	1
# ELI Households (0-30% AMI)	
Activity funds eligible for DREF (Ike Only)	
#Units ζ other green	
#Units deconstructed	
#Sites re-used	1
#Units exceeding Energy Star	
#Units with bus/rail access	1
#Low flow showerheads	
#Low flow toilets	2
#Units with solar panels	
#Dishwashers replaced	1
#Clothes washers replaced	1
#Refrigerators replaced	1
#Light fixtures (outdoors) replaced	3



#Light Fixtures (indoors) replaced	19
#Replaced hot water heaters	1
#Replaced thermostats	1
#Efficient AC added/replaced	1
#High efficiency heating plants	1
#Additional Attic/Roof Insulation	1
#Energy Star Replacement Windows	19
# of Properties	1

Activity is being carried out by Grantee:

No

Activity is being carried out through:

Organization carrying out Activity:

RIVER CITY HOUSING INC.

Proposed budgets for organizations carrying out Activity:

Responsible Organization	Organization Type	Proposed Budget
RIVER CITY HOUSING INC.	Non-Profit	\$ 169,400.00

Location Description:

Area of greatest need identified in 2008 included AREAs ADJACENT PARK DUVALLE(CT 10,127.01,128.01); SHAWNEE (CT 4,7); PORTLAND (CT 3,21,23); SMOKETOWN/SHELBY PARK(CT 62,65); NEWBURG (CT 113.01,114.04,114.05,114.06). One unit was located in the Portland neighborhood and the one unit was located in the Newburg neighborhood.

Activity Description:

NONPROFIT DEVELOPER WHO WILL ACQUIRE AND REHABILITATE PROPERTIES FOR EVENTUAL SALE TO LOW INCOME HOMEBUYERS.
River City Housing completed one unit which sold to a household below 50% Area Median Income.

Environmental Assessment: COMPLETED

Environmental Reviews: None

Project # / Title: LISA-RENTAL / LMHA DEVELOPMENT CORPORATION

Grantee Activity Number: 11-E-LH25-LMHA DEVELOPMENT CORPORATION



Activity Title: LOW INCOME SET ASIDE ACQ, NEW CONSTRUCT AND RENTAL

Activity Type:

Construction of new housing

Project Number:

LISA-RENTAL

Projected Start Date:

07/01/2010

Project Draw Block by HUD:

Not Blocked

Activity Draw Block by HUD:

Not Blocked

Block Drawdown By Grantee:

Not Blocked

National Objective:

LH25: Funds targeted for housing for households whose incomes are at or under 50% Area Median Income.

Activity Status:

Completed

Project Title:

LMHA DEVELOPMENT CORPORATION

Projected End Date:

03/20/2013

Project Draw Block Date by HUD:

Activity Draw Block Date by HUD:

Total Budget: \$ 2,096,478.17
Most Impacted and Distressed Budget: \$ 0.00
Other Funds: \$ 0.00
Total Funds: \$ 2,096,478.17

Benefit Report Type:

Direct (Households)

Proposed Beneficiaries

	Total	Low	Mod	Low/Mod%
# Renter Households	9	9		100.00
# of Households	9	9		100.00

Proposed Accomplishments

	Total
# of Singlefamily Units	9
# of Housing Units	9
# ELI Households (0-30% AMI)	6
#Units ζ other green	9
#Units exceeding Energy Star	9
#Units with bus/rail access	9
#Low flow showerheads	18
#Low flow toilets	18
#Units with solar panels	



Activity is being carried out by Grantee:

No

Activity is being carried out through:

Organization carrying out Activity:

LMHA DEVELOPMENT CORPORATION

Proposed budgets for organizations carrying out Activity:

Responsible Organization	Organization Type	Proposed Budget
LMHA DEVELOPMENT CORPORATION	Non-Profit	\$ 2,096,478.17
LOUISVILLE METRO HOUSING AUTHORITY DEVELOPMENT CORP	Local Government	\$ 0.00

Location Description:

Area of greatest need identified in 2008 included AREAs ADJACENT PARK DUVALLE(CT 10,127.01,128.01); SHAWNEE (CT 4,7); PORTLAND (CT 3,21,23); SMOKETOWN/SHELBY PARK(CT 62,65); NEWBURG (CT 113.01,114.04,114.05,114.06). Nine single family, scattered site rental units will be located in the smoketown neighborhood.

Activity Description:

FUNDING FOR THIS ACTIVITY WILL BE USED TO MEET THE LOW INCOME HOUSING SET-ASIDE REQUIREMENT BY PROVIDING RENTAL UNITS for households at or below 50% of the Area Median Income. FUNDS WILL BE USED TO ACQUIRE "VACANT" UNIMPROVED USE E TYPE PROPERTIES PHYSICALLY LOCATED IN THE SMOKETOWN NEIGHBORHOOD. SINGLE FAMILY RENTAL UNITS WILL BE CONSTRUCTED FOR LISA OCCUPANCY. All units will be Energy Star and Enterprise Green Communities Certified, as indicated in the "units other green" performance measures above.

Environmental Assessment: COMPLETED

Environmental Reviews: None

Action Plan Comments:

- Reviewer - Reviewed and accepted
- Reviewer - DRGR version is consistent with hard copy previously submitted and approved by HUD.
- Reviewer - Review 6/12/09
- Reviewer - no comments 6/25/09
- Reviewer - 6/25/09

Reviewer - Although the current DRGR action plan is not adequate, I will be approving the DRGR action plan so that you will be able to submit your next report timely. I am aware that a Plan update is in process.

I have made several comments on the current plan, please ensure that the update addresses these issues as well as your changes in projects and activities. I think all of these items have been discussed before, so there should not be any surprises.

1. The current DRGR Plan is not consistent with the information available at <http://www.louisvilleky.gov/Housing/Neighborhood+Stabilization+Program.htm>. As near as I can determine, only the original NSP plan is posted on the site. HUD expects the grantee website information to contain the same data as the DRGR plan and to maintain a "chain" of approved plans for public review. Also, it is not clear how you are communicating to citizens who lack computer access or need assistance due to disability or language issues.

2. Please download the current DRGR Plan and post it to the website as soon as possible. You are also reminded that you should follow the consolidated plan and citizen participation plan requirements for processing plan amendments. Minor changes may be implemented by notifying HUD via email and updating the DRGR Plan. Substantial amendments need a public notice and allow for comments prior to submitting the changes for HUD review. A summary of the changes (what was added, deleted or changed " project by project) should be emailed to our office at the same time the DRGR Plan is submitted for both minor and substantial amendments.

3. Prior to submitting the revised Plan in DRGR, please ensure that the data is consistent and correct. Many of the current projects state that the activity is NOT being carried out by the grantee and then state that the Louisville Metro Department of Housing and Family Services is carrying out the activity. Data consistency is very important. Many of the current projects list only census tract numbers, please use commonly used neighborhood and street names.

4. The correct national objective citation is essentially for ensuring that project are properly categorized, especially for LH25 projects. Compliance with the set aside requirements is based on DRGR data.

You are also reminded that the obligation deadline is September 20, 2010.

You may want to review the Commonwealth of Kentucky's Action Plan for style and content prior to updating your plan in DRGR.

The above comments provided via email on 4/16/10. RK

Reviewer - June 29, 2010. The DRGR revised action plan appears to be consistent with the hard copy submitted to HUD and approved on May 19, 2010. It does not appear that the grantee intended to fund homebuyer assistance with NSP funds as the project descriptions focus on acquisition and rehab and do not include any information regarding homebuyer assistance and how the amount could be determined or on compliance with CDBG rules for homebuyer assistance. The lack of clarity in this area is cause for concern and grantee was advised in the amendment approval letter that it was HUD's opinion that homebuyer assistance was not included in the plan. The current amendment includes on two public facilities, a LH25 activity, and three non-profit developers for acquisition and rehab. Grantee is very slow to implement and HUD has expressed grave concern to the Mayor on the ability of the grantee to meet the obligation deadline. RK 06/29/2010.

Reviewer - Action Plan technical corrections requested by HQ have been reviewed and accepted. RK 2/15/11

Reviewer - Grantee reported that while it had intended to make changes in its plan and initiated the process, it had not actually changed anything. Plan has been in modify status since shortly after previous QPR was submitted. Scanned plan and it appears to be consistent with prior plan with some slight changes in performance measurements. Reviewed and accepted. RK 7/29/11

Reviewer - Revisions reviewed and approved. Discussed with grantee staff. RK 3/1/12

Reviewer - Noted. Technical correction to add LH25 homebuyer activities for home ownership developers. RK 3/27/12

- Reviewer - Technical corrections approved. Grantee is working closely with NDC to update plan to correctly identify approved activities and appropriate accomplishments. RK 6/13/12
- Reviewer - Grantee submitted technical correction to action plan. Set up new LH25 activities for completed homebuyer project, and corresponding budget changes. Grantee did not explain changes in Plan document. Poor documentation practices. Grantee advised to document changes within the plan narrative. RK 6/19/12
- Reviewer - Grantee submitted another series of technical corrections to reflect that some developer partners actually produced LH25 units that were originally reflected as higher income units. There is a corresponding change in budgets but no change in overall program and plan. RK 10/1/12.
- Reviewer - These changes are expected to be the last round of technical corrections needed to bring the proposed activities into compliance with DRGR documentation requirements. RK 10/25/12
- Reviewer - Grantee apparently did not complete the data cleanup and corrections as it previously claimed in October 2012. Changes noted are considered technical corrections to clean up DRGR data issues. RK 1/30/13
- Reviewer - This change reallocated admin funds to an existing project. RK 3/18/13
- Reviewer - Budget changes. See Jeremy Dyer email 3/20/13, 12:28 p.m. for details. RK 3/20/13
- Reviewer - Plan is rejected. Several activities marked as complete do not appear to be complete based on other available information. RK 8/7/14
- Reviewer - The AP was changed to reopen the LH25 rental development activity because Metro closed the activity prior to completing the financial requirements. This step is also part of the final steps discussed during the recent NSP 1 monitoring to resolve outstanding issues and prepare the grant for closeout. A series of additional single purpose narrowly defined changes are anticipated until all issues are resolved. RK May 20, 2015
- Reviewer - This was a limited change amendment specifically to change the income determination method from the IRS 1040 to the Part 5 method. An additional amendment is expected to clarify that the on-going client income determinations for rental property will be CDBG instead of HOME. See hard copy file for further information. RK 5/26/2015
- Reviewer - Grantee reported no changes to action plan. AP rejected so grantee can use the opportunity to update and correct activity data and accomplishments to facilitate grant closeout. RK 6/26/17
- Reviewer - Grantee reported no changes to action plan. AP rejected so grantee can use the opportunity to update and correct activity data and accomplishments to facilitate grant closeout. RK 6/26/17
Reviewed 8/1/2017 grantee email with 3 additions/corrections with DRGR changes list. Approved ST 11/20/2017
- Reviewer - Grantee completed technical changes to area benefits per guidance from TA provider to correct previous areas. No other changes made per grantee. RK 02/15/2018 Approved. 3/9/16
- Reviewer - Grantee has been working with NSP TA provider to clean up DRGR data in preparation for closeout.

Action Plan History

Version	Date
B-08-MN-21-0001 AP#1	04/16/2010
B-08-MN-21-0001 AP#2	07/29/2011
B-08-MN-21-0001 AP#3	03/01/2012
B-08-MN-21-0001 AP#4	03/27/2012
B-08-MN-21-0001 AP#5	06/13/2012
B-08-MN-21-0001 AP#6	06/19/2012



B-08-MN-21-0001 AP#7	10/01/2012
B-08-MN-21-0001 AP#8	10/25/2012
B-08-MN-21-0001 AP#9	01/30/2013
B-08-MN-21-0001 AP#10	03/18/2013
B-08-MN-21-0001 AP#11	03/20/2013
B-08-MN-21-0001 AP#12	05/20/2015
B-08-MN-21-0001 AP#13	05/26/2015
B-08-MN-21-0001 AP#14	11/20/2017
B-08-MN-21-0001 AP#15	03/09/2018
B-08-MN-21-0001 AP#16	03/13/2018

