

**State of Tennessee
Draft Action Plan
for 2020 and 2021 Disasters**



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1. Executive Summary

Overview

The U.S. Department of Housing and Urban Development (HUD) announced that the State of Tennessee will receive \$84,980,000 in funding to support long-term recovery efforts following DR-4476-TN, DR-4541-TN and DR-4609-TN through the Department of Economic and Community Development (TNECD). Community Development Block Grant - Disaster Recovery (CDBG-DR) funding is designed to address needs that remain after all other assistance has been exhausted. This plan details how funds will be allocated to address remaining unmet need in Tennessee, with specific focus on the counties of Bradley, Davidson, Dickson, Hamilton, Humphreys, Putnam, and Wilson.

To meet disaster recovery needs, the statutes making CDBG-DR funds available have imposed additional requirements and authorized HUD to modify the rules that apply to the annual CDBG program to enhance flexibility and allow for a quicker recovery. HUD has allocated \$42,740,000 in CDBG-DR funds to the TNECD in response to DR-4476-TN and DR-4541-TN through the Federal Register publication of 87 FR 6364, February 3, 2022. This allocation was made available through the Disaster Relief Supplemental Appropriations Act of 2022 for major disasters occurring in 2020.

HUD allocated an additional \$25,403,000 in CDBG-DR funds through the Federal Register publication of the Federal Register 87 FR 31636, May 24, 2022, to TNECD from the Appropriations Act for disasters occurring in 2021 (DR-4609-TN). Nashville-Davidson County Tennessee also received \$5,151,000 through this notice.

Finally, supplemental allocation of \$16,602,000 in CDBG-DR funds was made available for recovery related to DR-4609-TN through the publication of Federal Register 88 FR 3198, January 18, 2023. The addition of this supplemental results in a total allocation for DR-4609-TN of \$42,005,000.

These CDBG-DR funds are for necessary expenses for activities authorized under Title I of the Housing and Community Development Act of 1974 (42 United States Code [U.S.C.] 5301 et seq.) (HCDA) related to disaster relief, long-term recovery, restoration of infrastructure and housing, economic revitalization, and mitigation in the “most impacted and distressed” (MID) areas resulting from a qualifying major disaster in 2020 or 2021.

TNECD is the lead agency and responsible entity for administering \$42,740,000 in 2020 CDBG-DR funds and \$42,005,000 in 2021 CDBG-DR funds allocated for disaster recovery programs. Because this funding addresses three different disaster events occurring in two different years, and in multiple jurisdictions across the state, from urban metropolitan to very rural communities, the program will be implemented through a sub-recipient model, following established policies and procedures of the state’s existing CDBG Program.

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Table 1: Unmet Need and Proposed Allocation

2020 Disasters				
Category	Remaining Unmet Need	% of Unmet Need	Program Allocation Amount	% of Program Allocation
Administration	\$2,137,000.00	2.1%	\$2,137,000.00	5.0%
Planning	\$0.00	0.0%	\$0.00	0.0%
Housing	\$43,255,543.22	42.8%	\$20,000,000.00	46.8%
Infrastructure	\$4,618,657.36	4.6%	\$15,028,000.00	35.2%
Economic Revitalization	\$45,363,327.28	44.9%	\$0.00	0.0%
Public Services	\$0.00	0.0%	\$0.00	0.0%
Mitigation	\$5,575,000.00	5.5%	\$5,575,000.00	13.0%
Total	\$100,949,527.86	100.0%	\$42,740,000.00	100.0%

Data Source(s): FEMA IA, SBA, FEMA Open Source

2021 Disasters				
Category	Remaining Unmet Need	% of Unmet Need	Program Allocation Amount	% of Program Allocation
Administration	\$2,100,250.00	5.1%	\$2,100,250.00	5.0%
Planning	\$1,000,000	2.4%	\$1,004,750	2.4%
Housing	\$20,817,776.63	50.3%	\$16,700,000.00	39.8%
Infrastructure	\$1,488,731.20	3.6%	\$16,700,000.00	39.8%
Economic Revitalization	\$10,481,876.23	25.3%	\$0.00	0.0%
Public Services	\$0.00	0.0%	\$0.00	0.0%
Mitigation	\$5,479,000.00	13.2%	\$5,500,000.00	13.1%
Total	\$41,367,634.06	100.0%	\$42,005,000.00	100.0%

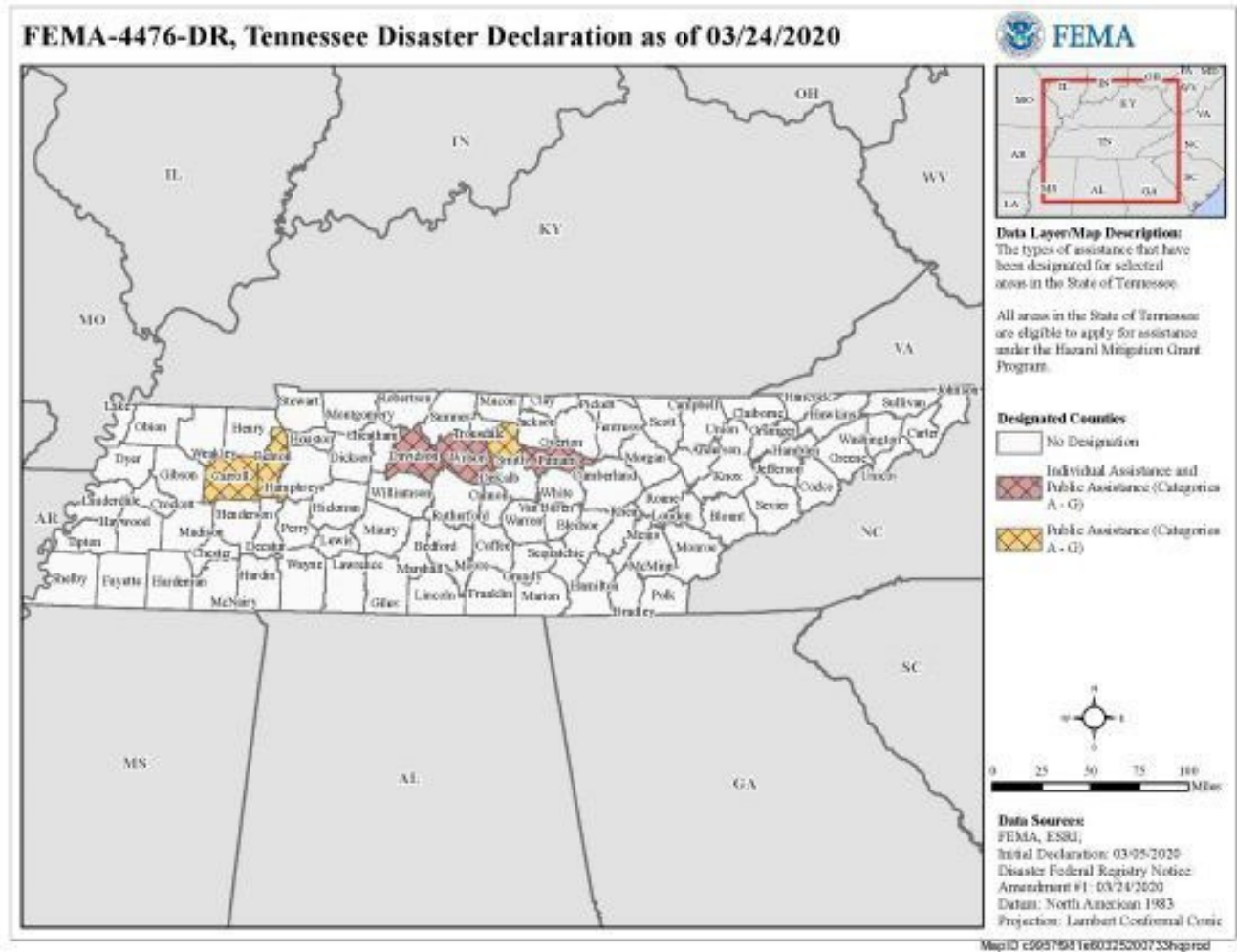
Data Source(s): FEMA IA, SBA, FEMA Open Source

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Disaster Specific Overview

FEMA 4476-DR-TN

Tennessee's Presidentially Declared Disasters by County



A pdf. file of the impacted areas may also be found at: https://gis.fema.gov/maps/dec_4476.pdf

On March 3, 2020, a storm system moved through the State of Tennessee, bringing tornadic activity, heavy rains, hail, and powerful winds through the west and middle regions of the state.

A confirmed tornado travelled through portions of Davidson, Wilson, and Putnam Counties. This tornado left a wide path of destruction with 25 confirmed fatalities, homes destroyed, businesses destroyed, widespread power outages, and significant damage to some educational facilities. Putnam County, Wilson County, City of Lebanon, and City of Mount Juliet declared a State of Emergency.

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Cascading impacts from the initial disaster included, but were not limited to: Downed power lines, trees, and debris scattered throughout the affected area posing a significant safety concern for the public. Ongoing search and rescue and firefighting operations were required.

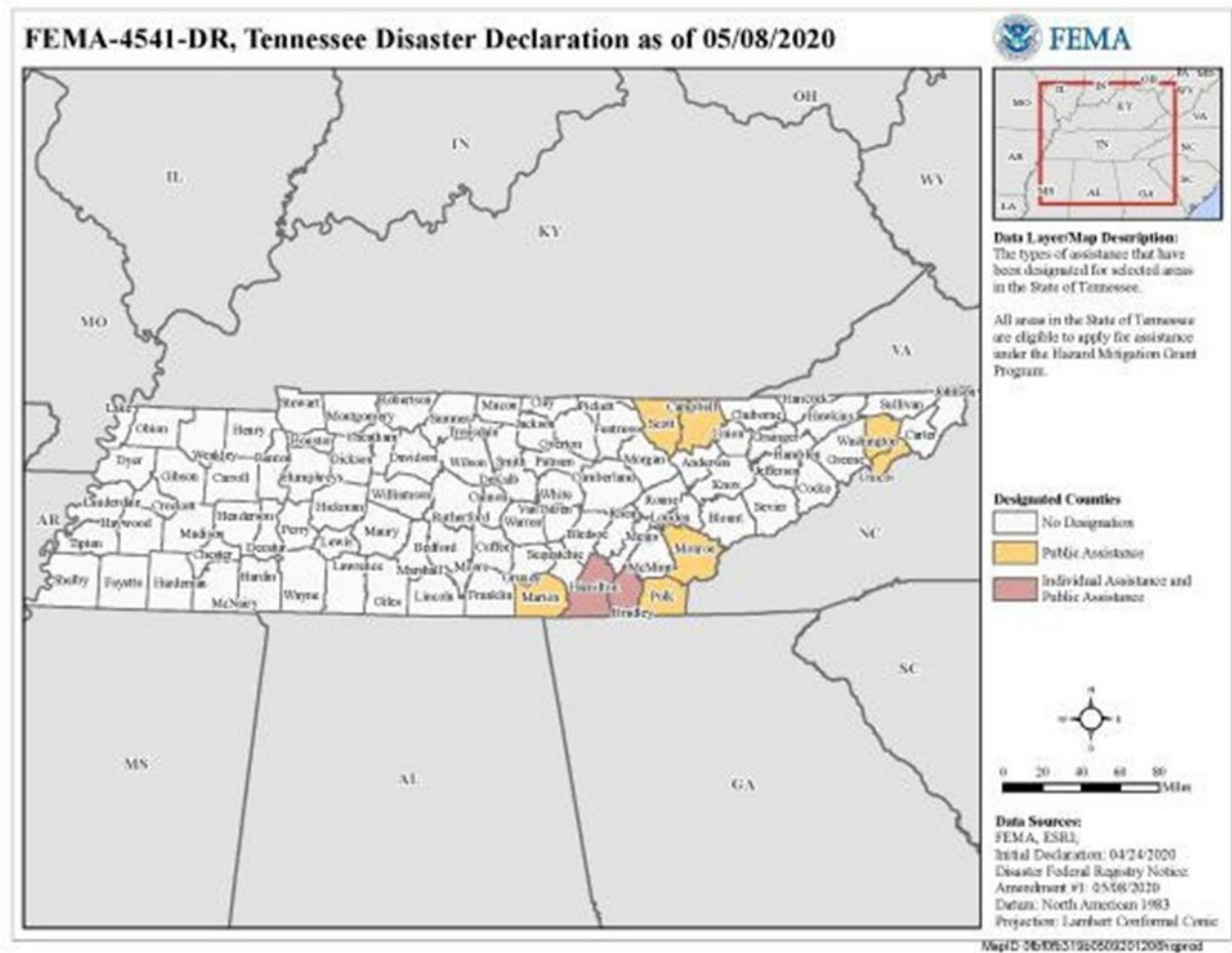
There were communication and transportation issues, and debris management required significant coordination. There were multiple power and transmission lines down across the region, with over 75,000 households in a heavily population metropolitan area without power. Interstate Highways initially had to be cleared, as well as several isolated state routes. The Nashville to Lebanon daily commuter train, the Music City Star, could not operate due to debris and fallen trees. CSX had to reroute rail traffic to clear their main rail lines.



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FEMA DR-4541

Tennessee's Presidentially Declared Disasters by County



A pdf. file of the impacted areas may also be found at: https://gis.fema.gov/maps/dec_4541.pdf

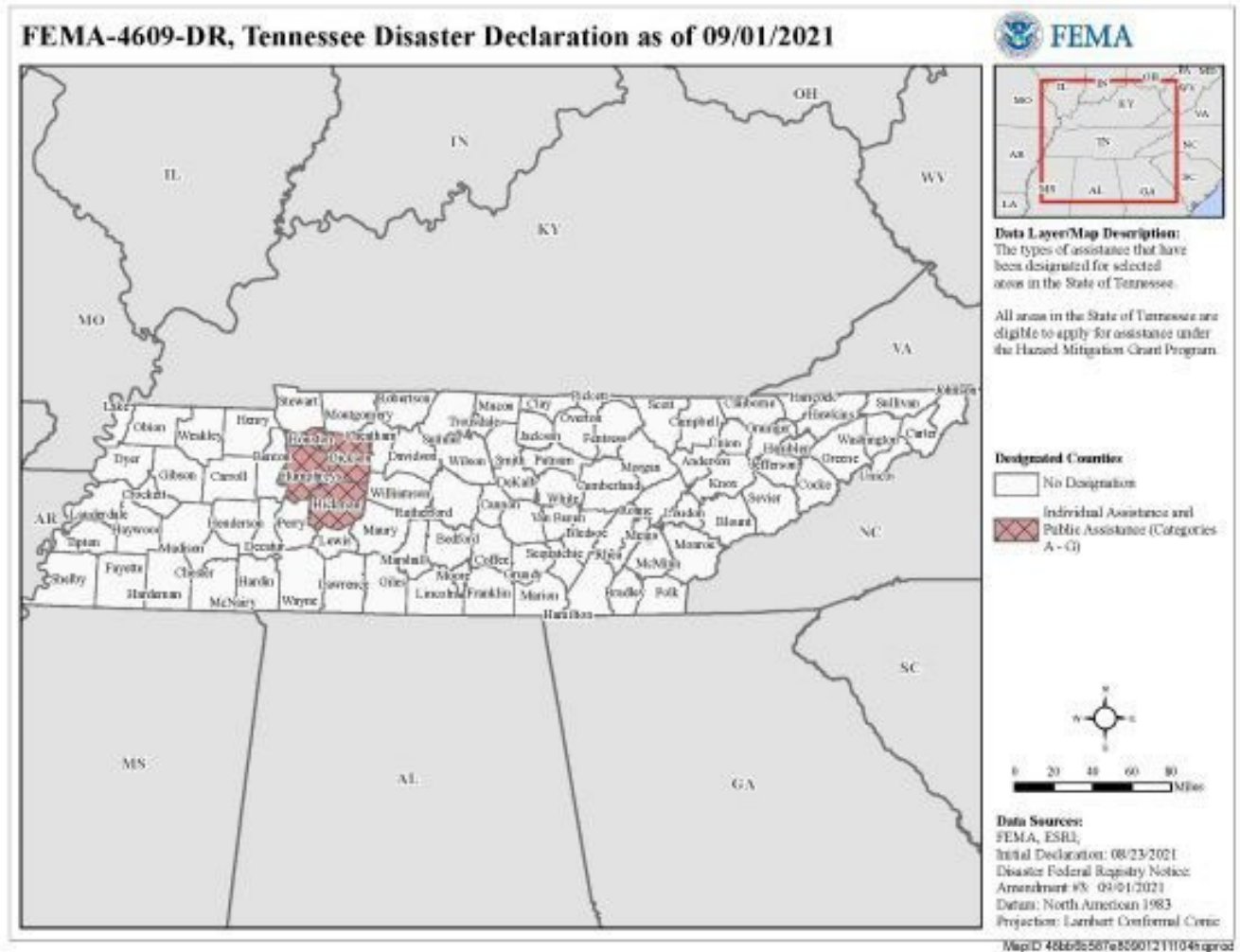
On April 12, 2020, a storm system moved through the State of Tennessee, bringing tornadic activity, heavy rains, flooding, hail, and powerful winds. The National Weather Service-Morristown office determined that the tornado was 9 miles long, 1500 feet wide at maximum width and approximately 145 m.p.h. and tornados travelled through portions of Hamilton, Bradley, and Marion Counties. The EF-3 tornados left a wide path of destruction with multiple injuries reported, as well as 4 fatalities, one in Marion County and three in Hamilton County. Dozens of homes and businesses were damaged or destroyed, and there were widespread power outages in multiple counties of Tennessee.

Cascading impacts from the initial disaster included, but were not limited to: Downed power lines, trees, and debris scattered throughout the affected area posing a significant safety concern for the public. There were communication and transportation issues, and debris management required significant coordination. There were multiple power and transmission lines down across the region, with over 2,400 households without power.

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FEMA 4609-DR-TN

Tennessee's Presidentially Declared Disasters by County

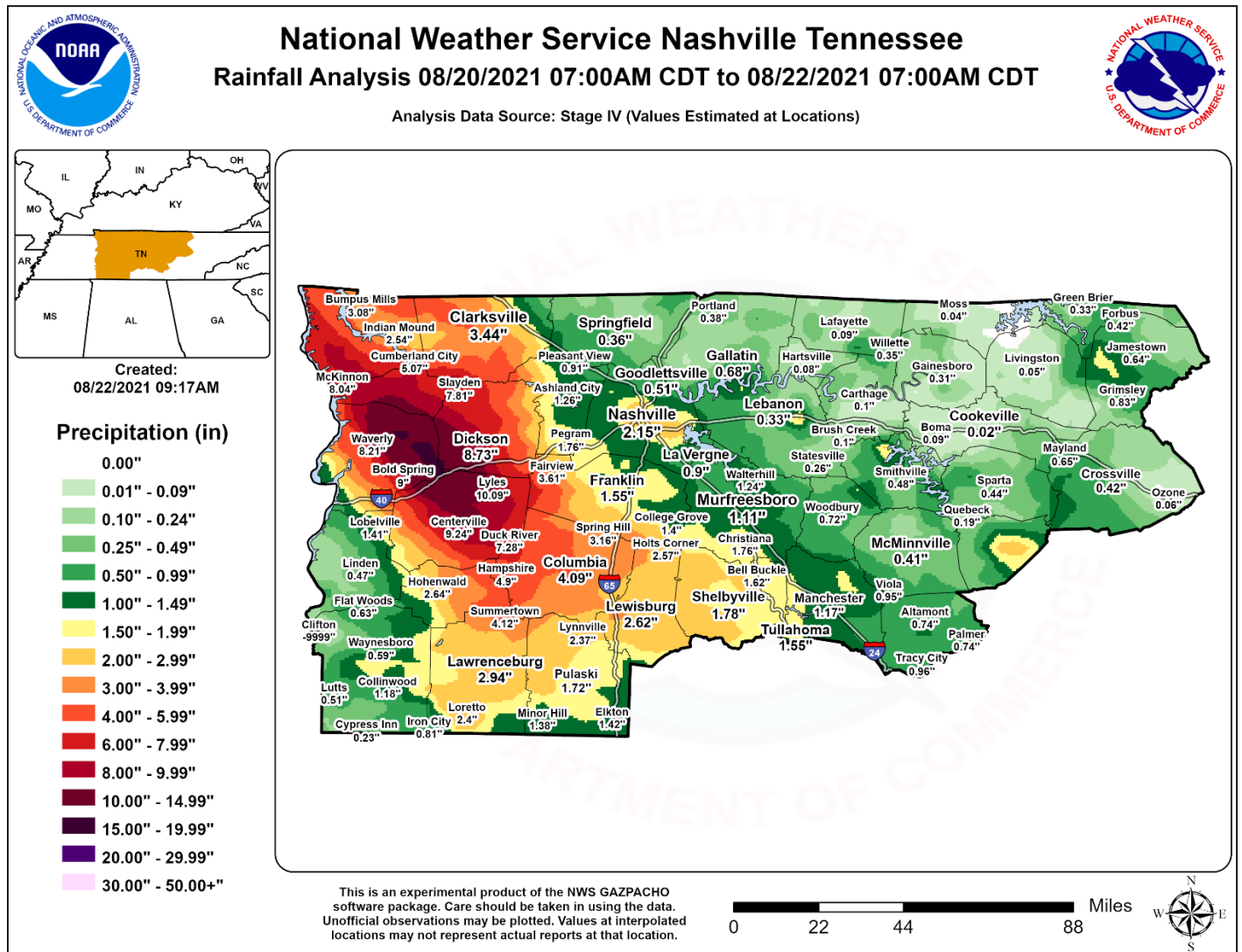


A pdf. file of the impacted areas may also be found at: https://gis.fema.gov/maps/dec_4609.pdf

On Saturday, August 21, 2021, the State experienced catastrophic flooding and flash flooding from a line of rain and storms that moved through the State. The Middle Region Counties affected were Dickson, Hickman, Houston, and Humphreys; with the City of Waverly being heavily impacted. This flooding left a wide path of destruction with 16 confirmed fatalities, homes destroyed, interruption of water services (including water services to Three Rivers Hospital, which is the primary hospital in the area), and major damage to Waverly Elementary School and Waverly Junior High, rendering them uninhabitable.

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Cascading impacts from the initial disaster included, but were not limited to: Downed power lines, trees, and debris scattered throughout the affected area posing a significant safety concern for the public. Ongoing search and rescue and firefighting operations were required. There were communication and transportation issues, and multiple power and transmission lines down, with over 10,500 households in a very rural area without power. Many roads had to be closed and bridges were damaged.



Additional information may be found at the Center For Western Weather and Water Extremes (CW3E) website: <https://cw3e.ucsd.edu/middle-tennessee-flooding-21-august-2021/>

2. Unmet Needs Assessment

Unmet Needs Overview

This section provides an analysis of the housing damages resulting from severe storms, tornados, straight-line winds, and flooding. It utilizes open-source Federal Emergency Management Individual Assistance (FEMA IA) and Public Assistance (FEMA PA) data as the basis of analysis. Prior to the severe storms, tornados, straight-line winds and flooding in March 2020, Nashville and surrounding counties were experiencing tremendous growth in both housing and economic revitalization. According to the October 21, 2022, Nashville Post, "Wesley Mortgage and McNaught Digital recently studied online search patterns to analyze the local housing market. According to their report, searches for terms related to home buying in Nashville and Tennessee increased dramatically between March 2020 and March 2022, but then decreased between March and July of this year. The companies found that Nashville had the seventh-highest search volume for "homes for sale" queries among major American cities."

Unfortunately, this rapid growth has disproportionately impacted low to moderate income people and families and resulted in an increase in unhoused individuals. In the report entitled, "Nashville Performance Study of Homelessness and Affordable Housing, May 2022," which may be found at: <https://www.nashville.gov/sites/default/files/2022-06/Nashville-Performance-Study-Homelessness-Affordable-Housing.pdf?ct=1654192067>, researchers found that as of the January 2022 Point in Time Count (PIT), there are roughly 1,900 individuals experiencing homelessness. Of the total, 634 persons are living outdoors or in places not fit for habitation, in cars or within the parks and streets of Nashville. This is an increase of about 10% from 2019 and 2020 when the PIT Counts found that there were, respectively, 584 and 585 individuals living on the streets and places not meant for human habitation in the Nashville Davidson Metropolitan Area.

Housing construction and rehabilitation needs have been identified as a priority across all disaster areas. Each community impacted by these disasters is unique, as shown in this narrative overview of available FEMA data. Severe storms, flooding, and tornadoes impacted Davidson, Wilson, and Putnam counties in March 2020, resulting in the FEMA DR-4476 disaster declaration. Under the declaration, 5,422 households applied for FEMA IA assistance resulting from the FEMA DR-4476 disaster. Of the total registrants, 2,243 (41%) are homeowners and 3,179 (59%) are renters. Of the FEMA IA applicants, 866 were found to have a FEMA verified loss over \$0, including 369 homeowners (43%) and 497 renters (57%). Of those with documented losses, 788 were approved for FEMA IA assistance, including 141 homeowners (18%) and 647 renters (82%).

Severe storms, flooding, and tornadoes impacted Bradley, Campbell, Hamilton, Marion, Monroe, Polk, Scott, Unicoi, and Washington counties in May 2020, resulting in the FEMA DR-4541 disaster declaration. Under the declaration, 1,317 households applied for FEMA IA assistance resulting from the FEMA DR-4541 disaster. Of the total registrants, 905 (69%) are homeowners and 412 (31%) are renters. Of the FEMA IA applicants, 516 were found to have a FEMA verified loss over \$0, including 319 homeowners (62%) and 197 renters (38%). Of those with documented

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losses, 383 were approved for FEMA IA assistance, including 227 homeowners (59%) and 156 renters (41%).

Flooding and flash flooding impacted Dickson, Hickman, Houston, and Humphreys counties in September 2021, resulting in the FEMA DR-4609 disaster declaration. Under the declaration, 2,478 households applied for FEMA IA assistance resulting from the FEMA DR-4609 disaster. Of the total registrants, 1,325 (53%) are homeowners and 1,153 (47%) are renters. Of the FEMA IA applicants, 951 were found to have a FEMA verified loss over \$0, including 593 homeowners (64%) and 331 renters (35%). Of those with documented losses, 955 were approved for FEMA IA assistance, including 593 homeowners (62%) and 362 renters (38%).

Housing Unmet Need

Of the counties impacted by Disaster Declarations 4476, 4541 and 4609, only Davidson and Hamilton counties have Public Housing Authority assistance programs within the community. While the more rural counties have access to Public Housing Authority assistance programs, they are more often located in neighboring counties. Public housing needs of historically disadvantaged populations are not fully reflected in the FEMA IA data obtained through the data sharing agreement with HUD or the FEMA open-source data. However, TNECD has been able to obtain information from the Waverly Housing Authority that in the 4609 declaration, 62 public housing units were destroyed, and the average family size is 3.5 people per unit. The early estimate is that FEMA is estimating \$5.3 million in recovery assistance, but this amount will be well short of the funding need to relocate all the public housing units that were damaged, including acquisition, design, construction, infrastructure costs, etc.

Additional analysis of renter income level using HUD-defined income categories yields potential unmet needs for this population. According to the Federal Register, rental units with a tenant earning less than the poverty level or 50 percent of the area median income (AMI) --whichever is greatest—are used to calculate likely unmet needs for affordable rental housing. HUD uses the following income categories:

- Low and Moderate Income (LMI) - 80 percent Area Median Income and below
- Very Low Income (VLI) - 50 percent AMI and below
- Extremely Low Income (ELI) - 30 percent AMI and below

As stated in the Federal Register Notice, HUD notes: "The average cost to fully repair a home for a specific disaster to code within each of the damage categories noted above is calculated using the median real property damage repair costs determined by the SBA for its disaster loan program based on a fuzzy match at the block group level comparing FEMA and SBA inspections." However, due to the lack of data to conduct this analysis, TNECD does not have FEMA registration numbers or SBA Home Loan data to conduct this approved methodology.

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Table 4: Pre-Disaster Renter- and Owner-Occupied Housing, by County

DR-4476				
County	Owner-Occupied (#)	Owner-Occupied (%)	Renter-Occupied (#)	Renter-Occupied (%)
Davidson	157,390	54.4	131,801	45.6
Putnam	19,681	61.2	12,096	38.1
Wilson	39,082	76.1	12,266	23.9

Source: American Community Survey, 5-Year Estimates

DR-4541				
County	Owner-Occupied (#)	Owner-Occupied (%)	Renter-Occupied (#)	Renter-Occupied (%)
Bradley	27,212	66.8	13,518	33.2
Hamilton	95,010	64.1	53,286	35.9

Source: American Community Survey, 5-Year Estimates

DR-4609				
County	Owner-Occupied (#)	Owner-Occupied (%)	Renter-Occupied (#)	Renter-Occupied (%)
Dickson	14,891	76.1	4,668	23.9
Hickman	7,124	82.1	1,551	17.9
Houston	2,322	79.5	597	20.5
Humphreys	5,389	78.5	1,480	21.5

Source: American Community Survey, 5-Year Estimates

Table 5: Pre-Disaster Vacancy Rates of Renter & Owner-Occupied Housing by MID County

DR-4476		
County	Renter-Occupied Vacancy Rate (%)	Owner-Occupied Vacancy Rate (%)
Davidson	7.2	1.2
Putnam	4.4	1.5
Wilson	6.8	0.6

Source: American Community Survey, 5-Year Estimates

DR-4541		
County	Renter-Occupied Vacancy Rate (%)	Owner-Occupied Vacancy Rate (%)
Bradley	5.4	0.8
Hamilton	6.6	1.6

Source: American Community Survey, 5-Year Estimates

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DR-4609		
County	Renter-Occupied Vacancy Rate (%)	Owner-Occupied Vacancy Rate (%)
Dickson	2.8	1.0
Hickman	4.9	1.7
Houston	2.3	0.5
Humphreys	4.0	3.2

Source: American Community Survey, 5-Year Estimates

Table 6: Evidence of Cost Burden

DR-4476			
County	Median Home Value (\$)	Median Gross Rent (\$)	Building Permits Issued (2021)
Davidson	294,200	1,252	16,310
Putnam	172,900	779	N/A
Wilson	300,800	1,171	2,317

Source: American Community Survey, 5-Year Estimates; HUD State of the Cities Data Systems

DR-4541			
County	Median Home Value (\$)	Median Gross Rent (\$)	Building Permits Issued (2021)
Bradley	179,700	836	330
Hamilton	210,500	966	2,752

Source: American Community Survey, 5-Year Estimates; HUD State of the Cities Data Systems

DR-4609			
County	Median Home Value (\$)	Median Gross Rent (\$)	Building Permits Issued (2021)
Dickson	200,900	683	617
Hickman	130,700	736	131
Houston	126,300	664	N/A
Humphreys	139,600	707	N/A

Source: American Community Survey, 5-Year Estimates; HUD State of the Cities Data Systems

Table 7: Unmet Needs Summary

DR-4476					
Category	Data Type	Total Damage	Total Resources	Unmet Need	Percentage
Housing	FEMA IA	\$6,160,375.16	\$1,184,615.79	\$4,975,759.37	80.8%
Housing	SBA Home/EIDL	\$36,237,266.30	\$11,218,140.00	\$25,019,126.30	69.0%
Infrastructure	FEMA PA (C-G only)	\$7,933,748.43	\$7,140,373.59	\$793,374.84	10.0%
Economic	SBA Business/EIDL	\$23,069,243.84	\$5,834,500.00	\$17,234,743.84	74.7%
Total		\$73,400,633.73	\$25,377,629.38	\$48,023,004.35	65.4%

Data Source(s): FEMA IA, SBA, FEMA Open Source

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DR-4541					
Category	Data Type	Total Damage	Total Resources	Unmet Need	Percentage
Housing	FEMA IA	\$2,938,081.05	\$1,388,209.17	\$1,549,871.88	52.8%
Housing	SBA Home/EIDL	\$19,302,205.67	\$7,591,420.00	\$11,710,785.67	60.7%
Infrastructure	FEMA PA (C-G only)	\$38,252,825.41	\$34,427,542.89	\$3,825,282.52	10.0%
Economic	SBA Business/EIDL	\$28,554,183.44	\$425,600.00	\$28,128,583.44	98.5%
Total		\$89,047,295.57	\$43,832,772.06	\$45,214,523.51	50.8%

Data Source(s): FEMA IA, SBA, FEMA Open Source

DR-4609					
Category	Data Type	Total Damage	Total Resources	Unmet Need	Percentage
Housing	FEMA IA	\$13,361,708.64	\$6,330,884.68	\$7,030,823.96	52.6%
Housing	SBA Home/EIDL	\$24,873,820.07	\$9,951,578.00	\$13,786,952.67	60.0%
Infrastructure	FEMA PA (C-G only)	\$14,887,312.25	\$13,398,581.05	\$1,488,731.20	10.0%
Economic	SBA Business/EIDL	\$13,605,076.23	\$3,123,200.00	\$10,481,876.23	77.0%
Total		\$66,727,917.19	\$32,804,243.73	\$32,788,384.06	49.1%

Data Source(s): FEMA IA, SBA, FEMA Open Source

Disaster Damage and Impacts

This section provides an analysis of the housing damages resulting from severe storms, tornados, straight-line winds, and flooding. It utilizes open-source Federal Emergency Management Individual Assistance (FEMA IA) and Public Assistance (FEMA PA) data as the basis of analysis. Each community impacted by these disasters is unique, as shown in this narrative overview of available FEMA data:

Severe storms, flooding, and tornadoes impacted Davidson, Wilson, and Putnam counties in March 2020, resulting in the FEMA DR-4476 disaster declaration. Under the declaration, 5,422 households applied for FEMA IA assistance resulting from the FEMA DR-4476 disaster. Of the total registrants, 2,243 (41%) are homeowners and 3,179 (59%) are renters. Of the FEMA IA applicants, 866 were found to have a FEMA verified loss over \$0, including 369 homeowners (43%) and 497 renters (57%). Of those with documented losses, 788 were approved for FEMA IA assistance, including 141 homeowners (18%) and 647 renters (82%).

Severe storms, flooding, and tornadoes impacted Bradley, Campbell, Hamilton, Marion, Monroe, Polk, Scott, Unicoi, and Washington counties in May 2020, resulting in the FEMA DR-4541 disaster declaration. Under the declaration, 1,317 households applied for FEMA IA assistance resulting from the FEMA DR-4541 disaster. Of the total registrants, 905 (69%) are homeowners and 412 (31%) are renters. Of the FEMA IA applicants, 516 were found to have a FEMA verified loss over \$0, including 319 homeowners (62%) and 197 renters (38%). Of those with documented

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losses, 383 were approved for FEMA IA assistance, including 227 homeowners (59%) and 156 renters (41%).

Flooding and flash flooding impacted Dickson, Hickman, Houston, and Humphreys counties in September 2021, resulting in the FEMA DR-4609 disaster declaration. Under the declaration, 2,478 households applied for FEMA IA assistance resulting from the FEMA DR-4609 disaster. Of the total registrants, 1,325 (53%) are homeowners and 1,153 (47%) are renters. Of the FEMA IA applicants, 951 were found to have a FEMA verified loss over \$0, including 593 homeowners (64%) and 331 renters (35%). Of those with documented losses, 955 were approved for FEMA IA assistance, including 593 homeowners (62%) and 362 renters (38%).

Table 8: HUD Income Limits

DR-4476 (Davidson County)								
	1 Person	2 Person	3 Person	4 Person	5 Person	6 Person	7 Person	8 Person
Extremely Low Income (30% AMI)	\$19,850	\$22,650	\$25,500	\$28,300	\$32,470	\$37,190	\$41,910	\$46,630
Very Low Income (50% AMI)	\$33,050	\$37,750	\$42,450	\$47,150	\$50,950	\$54,700	\$58,500	\$62,250
Low and Moderate Income (80% AMI)	\$52,850	\$60,400	\$67,950	\$75,450	\$81,500	\$87,550	\$93,600	\$99,600

Source: HUD

DR-4476 (Putnam County)								
	1 Person	2 Person	3 Person	4 Person	5 Person	6 Person	7 Person	8 Person
Extremely Low Income (30% AMI)	\$13,950	\$18,310	\$23,030	\$27,750	\$32,470	\$37,190	\$41,150	\$43,800
Very Low Income (50% AMI)	\$23,250	\$26,550	\$29,850	\$33,150	\$35,850	\$38,500	\$41,150	\$43,800
Low and Moderate Income (80% AMI)	\$37,150	\$42,450	\$47,750	\$53,050	\$57,300	\$61,550	\$65,800	\$70,050

Source: HUD

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DR-4476 (Wilson County)								
	1 Person	2 Person	3 Person	4 Person	5 Person	6 Person	7 Person	8 Person
Extremely Low Income (30% AMI)	\$19,850	\$22,650	\$25,500	\$28,300	\$32,470	\$37,190	\$41,910	\$46,630
Very Low Income (50% AMI)	\$33,050	\$37,750	\$42,450	\$47,150	\$50,950	\$54,700	\$58,500	\$62,250
Low and Moderate Income (80% AMI)	\$52,850	\$60,400	\$67,950	\$75,450	\$81,500	\$87,550	\$93,600	\$99,600

Source: HUD

DR-4541 (Bradley County)								
	1 Person	2 Person	3 Person	4 Person	5 Person	6 Person	7 Person	8 Person
Extremely Low Income (30% AMI)	\$13,750	\$18,310	\$23,030	\$27,750	\$32,470	\$37,190	\$40,500	\$43,100
Very Low Income (50% AMI)	\$22,900	\$26,150	\$29,400	\$32,650	\$35,300	\$37,900	\$40,500	\$43,100
Low and Moderate Income (80% AMI)	\$36,600	\$41,800	\$47,050	\$52,250	\$56,450	\$60,650	\$64,800	\$69,000

Source: HUD

DR-4541 (Hamilton County)								
	1 Person	2 Person	3 Person	4 Person	5 Person	6 Person	7 Person	8 Person
Extremely Low Income (30% AMI)	\$15,800	\$18,310	\$23,030	\$27,750	\$32,470	\$37,190	\$41,910	\$46,630
Very Low Income (50% AMI)	\$26,350	\$30,100	\$33,850	\$37,600	\$40,650	\$43,650	\$46,650	\$49,650
Low and Moderate Income (80% AMI)	\$42,150	\$48,150	\$54,150	\$60,150	\$65,000	\$69,800	\$74,600	\$79,400

Source: HUD

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DR-4609 (Dickson County)								
	1 Person	2 Person	3 Person	4 Person	5 Person	6 Person	7 Person	8 Person
Extremely Low Income (30% AMI)	\$19,850	\$22,650	\$25,500	\$28,300	\$32,470	\$37,190	\$41,910	\$46,630
Very Low Income (50% AMI)	\$33,050	\$37,750	\$42,450	\$47,150	\$50,950	\$54,700	\$58,500	\$62,250
Low and Moderate Income (80% AMI)	\$52,850	\$60,400	\$67,950	\$75,450	\$81,500	\$87,550	\$93,600	\$99,600

Source: HUD

DR-4609 (Hickman County)								
	1 Person	2 Person	3 Person	4 Person	5 Person	6 Person	7 Person	8 Person
Extremely Low Income (30% AMI)	\$13,590	\$18,310	\$23,030	\$27,750	\$32,470	\$36,600	\$39,150	\$41,650
Very Low Income (50% AMI)	\$22,100	\$25,250	\$28,400	\$31,550	\$34,100	\$36,600	\$39,150	\$41,650
Low and Moderate Income (80% AMI)	\$35,350	\$40,400	\$45,450	\$50,450	\$54,500	\$58,550	\$62,600	\$66,600

Source: HUD

DR-4609 (Houston County)								
	1 Person	2 Person	3 Person	4 Person	5 Person	6 Person	7 Person	8 Person
Extremely Low Income (30% AMI)	\$13,590	\$18,310	\$23,030	\$27,750	\$32,470	\$36,600	\$39,150	\$41,650
Very Low Income (50% AMI)	\$22,100	\$25,250	\$28,400	\$31,550	\$34,100	\$36,600	\$39,150	\$41,650
Low and Moderate Income (80% AMI)	\$35,350	\$40,400	\$45,450	\$50,450	\$54,500	\$58,550	\$62,600	\$66,600

Source: HUD

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DR-4609 (Humphreys County)								
	1 Person	2 Person	3 Person	4 Person	5 Person	6 Person	7 Person	8 Person
Extremely Low Income (30% AMI)	\$13,590	\$18,310	\$23,030	\$27,750	\$32,470	\$36,600	\$39,150	\$41,650
Very Low Income (50% AMI)	\$22,100	\$25,250	\$28,400	\$31,550	\$34,100	\$36,600	\$39,150	\$41,650
Low and Moderate Income (80% AMI)	\$35,350	\$40,400	\$45,450	\$50,450	\$54,500	\$58,550	\$62,600	\$66,600

Source: HUD

Single-Family and Multi-Family Needs

Table 9: FEMA IA Owner Occupied

DR-4476						
County	# Applicants	# Inspections	# Inspected with Damage	# Received Assistance	Total FEMA Verified Loss	Average FEMA Verified Loss
Davidson	1,263	1,263	205	75	\$1,704,114.69	\$8,312.75
Putnam	430	430	79	16	\$1,770,446.95	\$22,410.72
Wilson	550	550	85	23	\$1,568,456.87	\$18,452.43

Source: FEMA IA

DR-4541						
County	# Applicants	# Inspections	# Inspected with Damage	# Received Assistance	Total FEMA Verified Loss	Average FEMA Verified Loss
Bradley	93	93	47	32	\$313,250.42	\$6,664.90
Hamilton	812	812	272	168	\$2,197,248.88	\$8,078.12

Source: FEMA IA

DR-4609						
County	# Applicants	# Inspections	# Inspected with Damage	# Received Assistance	Total FEMA Verified Loss	Average FEMA Verified Loss
Dickson	273	273	38	33	\$140,597.91	\$3,699.95
Hickman	146	146	53	45	\$428,526.56	\$8,085.41
Houston	116	116	53	50	\$165,258.49	\$3,118.09
Humphreys	790	790	471	361	\$11,581,579.49	\$24,589.34

Source: FEMA IA

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Table 10: FEMA IA Tenant Applications

DR-4476						
County	# Applicants	# Inspections	# Inspected with Damage	# Received Assistance	Total FEMA Verified Loss	Average FEMA Verified Loss
Davidson	2,690	2,690	505	167	\$269,476.33	\$1,613.63
Putnam	258	258	97	49	\$165,065.67	\$3,368.69
Wilson	231	231	40	14	\$27,479.83	\$1,962.85

Source: FEMA IA

DR-4541						
County	# Applicants	# Inspections	# Inspected with Damage	# Received Assistance	Total FEMA Verified Loss	Average FEMA Verified Loss
Bradley	68	68	33	13	\$49,602.72	\$3,815.59
Hamilton	344	344	147	63	\$125,712.10	\$1,995.43

Source: FEMA IA

DR-4609						
County	# Applicants	# Inspections	# Inspected with Damage	# Received Assistance	Total FEMA Verified Loss	Average FEMA Verified Loss
Dickson	311	311	8	4	\$4,910.27	\$1,227.57
Hickman	105	105	4	2	\$4,059.97	\$2,029.99
Houston	80	80	6	2	\$2,200.27	\$1,100.14
Humphreys	657	657	334	224	\$1,028,703.82	\$4,592.43

Source: FEMA IA

Table 11: FEMA IA Applications by Housing Type

DR-4476					
Residence Type	# Applicants	% Owner Occupied	% Tenants	% Unknown	% Type
Apartment	1,547	0.1%	99.7%	0.2%	28.4%
Assisted Living Facility	7	0.0%	100.0%	0.0%	0.1%
College Dorm	4	0.0%	100.0%	0.0%	0.1%
Condo	64	54.7%	45.3%	0.0%	1.2%
Correctional Facility	1	0.0%	100.0%	0.0%	0.0%
House/Duplex	2,990	66.0%	33.6%	0.5%	54.9%
Mobile Home	110	50.0%	47.3%	2.7%	2.0%
Other	593	23.3%	76.2%	0.5%	10.9%
Townhouse	110	26.4%	73.6%	0.0%	2.0%
Travel Trailer	19	68.4%	31.6%	0.0%	0.3%

Source: FEMA IA

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DR-4541					
Residence Type	# Applicants	% Owner Occupied	% Tenants	% Unknown	% Type
Apartment	78	0.0%	100.0%	0.0%	5.9%
Assisted Living Facility	0	0.0%	0.0%	0.0%	0.0%
College Dorm	0	0.0%	0.0%	0.0%	0.0%
Condo	11	45.5%	54.5%	0.0%	0.8%
Correctional Facility	0	0.0%	0.0%	0.0%	0.0%
House/Duplex	967	78.2%	21.3%	0.5%	73.0%
Mobile Home	200	58.5%	40.5%	1.0%	15.1%
Other	36	55.6%	44.4%	0.0%	2.7%
Townhouse	29	13.8%	86.2%	0.0%	2.2%
Travel Trailer	4	75.0%	0.0%	25.0%	0.3%

Source: FEMA IA

DR-4609					
Residence Type	# Applicants	% Owner Occupied	% Tenants	% Unknown	% Type
Apartment	262	0.0%	99.6%	0.4%	10.5%
Assisted Living Facility	3	0.0%	100.0%	0.0%	0.1%
College Dorm	0	0.0%	0.0%	0.0%	0.0%
Condo	11	81.8%	18.2%	0.0%	0.4%
Correctional Facility	0	0.0%	0.0%	0.0%	0.0%
House/Duplex	1,726	58.5%	40.8%	0.7%	69.2%
Mobile Home	228	68.0%	31.6%	0.4%	9.1%
Other	178	46.6%	48.3%	5.1%	7.1%
Townhouse	42	78.6%	21.4%	0.0%	1.7%
Travel Trailer	45	80.0%	20.0%	0.0%	1.8%

Source: FEMA IA

Table 22: FEMA Real Property Damage Owner Occupied Units

DR-4476					
County	Units with Minor-Low	Units with Minor-High	Units with Major-Low	Units with Major-High	Units with Severe
Davidson	94	66	36	5	4
Putnam	31	30	6	2	10
Wilson	28	27	18	2	8

Source: FEMA IA

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DR-4541					
County	Units with Minor-Low	Units with Minor-High	Units with Major-Low	Units with Major-High	Units with Severe
Bradley	15	23	10	0	0
Hamilton	71	119	78	3	1

Source: FEMA IA

DR-4609					
County	Units with Minor-Low	Units with Minor-High	Units with Major-Low	Units with Major-High	Units with Severe
Dickson	27	7	3	1	0
Hickman	28	12	5	7	1
Houston	40	11	1	1	0
Humphreys	113	112	17	192	39

Source: FEMA IA

Table 13: FEMA Real Property Damage Rental Units

DR-4476					
County	Units with Minor-Low	Units with Minor-High	Units with Major-Low	Units with Major-High	Units with Severe
Davidson	275	100	78	47	5
Putnam	37	15	14	24	7
Wilson	16	9	8	4	3

Source: FEMA IA

DR-4541					
County	Units with Minor-Low	Units with Minor-High	Units with Major-Low	Units with Major-High	Units with Severe
Bradley	5	5	6	16	1
Hamilton	54	41	26	23	3

Source: FEMA IA

DR-4609					
County	Units with Minor-Low	Units with Minor-High	Units with Major-Low	Units with Major-High	Units with Severe
Dickson	3	2	2	1	0
Hickman	2	1	0	1	0
Houston	3	2	0	1	0
Humphreys	35	34	43	167	55

Source: FEMA IA

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Public Housing and Affordable Housing

Table 34: Multifamily Assisted Housing

Type Of Damage	# of Properties	# of Units	# of Units Assisted	# of Units Waiting Assistance	Remaining Unmet Need
Minor-Low	N/A	N/A	N/A	N/A	N/A
Minor-High	N/A	N/A	N/A	N/A	N/A
Major-Low	N/A	N/A	N/A	N/A	N/A
Major-High	N/A	N/A	N/A	N/A	N/A
Severe	N/A	N/A	N/A	N/A	N/A
Total	N/A	N/A	N/A	N/A	N/A

Source: We are not currently aware of damages to Multifamily Assisted Housing for the 2020 disaster covered areas. Over the course of the grant, if damages are realized, this table will be updated.

Table 45: Public Housing Authorities Damaged

County/Municipality	Total # PHAs	Total PHAs Damaged	# of Units Damaged	Remaining Unmet Need
Humphreys	1	1	62	Undetermined
Statewide				
Total	1	1	62	Undetermined

Source: Best currently available data - FEMA Open Source

Table 56: Owner with Losses with and without Flood Insurance

DR-4609				
County	(#) Flood Insurance	(#) Without Flood Insurance	(\$ Total Losses with Flood Insurance	(\$ Total Losses without Flood Insurance
Dickson	11	262	\$0.00	\$134,576.74
Hickman	13	133	\$170,462.89	\$256,069.69
Houston	4	112	\$0.00	\$131,719.15
Humphreys	99	691	\$3,463,221.12	\$8,093,985.43

Source: FEMA IA, HUD

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Table 67: Insurance Claims and Losses in Disaster-Impact Areas

DR-4476					
County	(#) No RP or PP Insurance	(#) RP or PP Insurance	(\$ Total Losses with No RP or PP Insurance	(\$ Total Losses with RP or PP Insurance	(%) Losses with No RP or PP Insurance
Davidson	2,351	1,615	\$1,305,123.39	\$ 1,146,882.22	53.2%
Putnam	281	412	\$562,774.04	\$1,485,270.91	27.5%
Wilson	222	564	\$567,519.36	\$1,092,805.24	34.2%

Source: FEMA IA

DR-4541					
County	(#) No RP or PP Insurance	(#) RP or PP Insurance	(\$ Total Losses with No RP or PP Insurance	(\$ Total Losses with RP or PP Insurance	(%) Losses with No RP or PP Insurance
Bradley	106	56	\$351,961.14	\$87,017.29	80.2%
Hamilton	408	755	\$1,438,115.29	\$1,060,987.33	57.5%

Source: FEMA IA

DR-4609					
County	(#) No RP or PP Insurance	(#) RP or PP Insurance	(\$ Total Losses with No RP or PP Insurance	(\$ Total Losses with RP or PP Insurance	(%) Losses with No RP or PP Insurance
Dickson	448	138	\$48,171.05	\$108,047.44	30.8%
Hickman	165	88	\$77,817.95	\$356,080.18	17.9%
Houston	115	81	\$77,317.09	\$96,447.25	44.5%
Humphreys	810	657	\$2,632,125.22	\$10,555,819.08	20.0%

Source: FEMA IA

Table 78: Number of SBA Home Loans

DR-4476					
County	# of Claims	Total Verified Loss (\$)	Total Loan Amount Approved (\$)	Total EIDL Amount (\$)	Total Unmet Need (\$)
Davidson	30	\$10,950,117.49	\$4,040,500.00	\$60,600.00	\$6,849,017.49
Putnam	6	\$15,463,164.93	\$5,070,300.00	\$12,120.00	\$10,380,744.93
Wilson	6	\$9,823,983.88	\$2,022,500.00	\$12,120.00	\$7,789,363.88

Source: SBA

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DR-4541					
County	# of Claims	Total Verified Loss (\$)	Total Loan Amount Approved (\$)	Total EIDL Amount (\$)	Total Unmet Need (\$)
Bradley	5	\$541,320.17	\$148,600.00	\$10,100.00	\$382,620.17
Hamilton	16	\$18,760,885.50	\$7,400,400.00	\$32,320.00	\$11,328,165.50

Source: SBA

DR-4609					
County	# of Claims	Total Verified Loss (\$)	Total Loan Amount Approved (\$)	Total EIDL Amount (\$)	Total Unmet Need (\$)
Dickson	2	\$1,861,031.40	\$721,700.00	\$4,042.00	\$1,135,289.40
Hickman	7	\$1,048,562.23	\$614,000.00	\$14,147.00	\$420,415.23
Houston	4	\$250,675.00	\$24,300.00	\$8,084.00	\$218,291.00
Humphreys	5	\$21,713,551.44	\$8,555,200.00	\$10,105.00	\$13,148,246.44

Source: SBA

Table 19: SBA Business Loan Data

DR-4476			
Damaged Property County Name	Total Verified Loss	Total Approved Loan Amount	Total Unmet Need
Davidson	\$16,074,958.20	\$3,445,100	\$12,629,858.20
Putnam	\$1,433,866.71	\$1,073,000.00	\$360,866.71
Wilson	\$5,560,418.93	\$1,316,400.00	\$4,244,018.93

Source: SBA

DR-4541			
Damaged Property County Name	Total Verified Loss	Total Approved Loan Amount	Total Unmet Need
Bradley	\$736,859.61	\$0.00	\$736,859.61
Hamilton	\$27,817,323.83	\$425,600.00	\$27,391,723.83

Source: SBA

DR-4609			
Damaged Property County Name	Total Verified Loss	Total Approved Loan Amount	Total Unmet Need
Dickson	\$2,163,392.52	\$1,755,300.00	\$408,092.52
Hickman	\$5,000.00	\$0.00	\$5,000.00
Houston	\$19,975.00	\$0.00	\$19,975.00
Humphreys	\$13,580,101.23	\$3,123,200.00	\$10,456,901.23

Source: SBA

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Single Family v. Multi-Family Needs: Owner Occupied v. Tenant

Of the counties impacted by Disaster Declarations 4476, 4541 and 4609, only Davidson and Hamilton counties have Public Housing Authority assistance programs within the community. While the more rural counties have access to Public Housing Authority assistance programs, they are more often located in neighboring counties. At the time of the development of this Action Plan, TNECD does not yet have a data sharing agreement in place to receive full data from FEMA. However, TNECD has been able to obtain information from the Dickson Housing Authority that in the 4609 declaration, 62 public housing units were destroyed, and the average family size is 3.5 people per unit.

This section provides an analysis of the housing damages resulting from severe storms, tornados, straight-line winds, and flooding. It utilizes open-source Federal Emergency Management Individual Assistance (FEMA IA) and Public Assistance (FEMA PA) data as the basis of analysis. Each community impacted by these disasters is unique, as shown in this narrative overview of available FEMA data:

Severe storms, flooding, and tornadoes impacted Davidson, Wilson, and Putnam counties in March 2020, resulting in the FEMA DR-4476 disaster declaration. Under the declaration, 5,422 households applied for FEMA IA assistance resulting from the FEMA DR-4476 disaster. Of the total registrants, 2,243 (41%) are homeowners and 3,179 (59%) are renters. Of the FEMA IA applicants, 866 were found to have a FEMA verified loss over \$0, including 369 homeowners (43%) and 497 renters (57%). Of those with documented losses, 788 were approved for FEMA IA assistance, including 141 homeowners (18%) and 647 renters (82%).

Severe storms, flooding, and tornadoes impacted Bradley, Campbell, Hamilton, Marion, Monroe, Polk, Scott, Unicoi, and Washington counties in May 2020, resulting in the FEMA DR-4541 disaster declaration. Under the declaration, 1,317 households applied for FEMA IA assistance resulting from the FEMA DR-4541 disaster. Of the total registrants, 905 (69%) are homeowners and 412 (31%) are renters. Of the FEMA IA applicants, 516 were found to have a FEMA verified loss over \$0, including 319 homeowners (62%) and 197 renters (38%). Of those with documented losses, 383 were approved for FEMA IA assistance, including 227 homeowners (59%) and 156 renters (41%).

Flooding and flash flooding impacted Dickson, Hickman, Houston, and Humphreys counties in September 2021, resulting in the FEMA DR-4609 disaster declaration. Under the declaration, 2,478 households applied for FEMA IA assistance resulting from the FEMA DR-4609 disaster. Of the total registrants, 1,325 (53%) are homeowners and 1,153 (47%) are renters. Of the FEMA IA applicants, 951 were found to have a FEMA verified loss over \$0, including 593 homeowners (64%) and 331 renters (35%). Of those with documented losses, 955 were approved for FEMA IA assistance, including 593 homeowners (62%) and 362 renters (38%).

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As stated in the Federal Register Notice, HUD notes: "The average cost to fully repair a home for a specific disaster to code within each of the damage categories noted above is calculated using the median real property damage repair costs determined by the SBA for its disaster loan program based on a fuzzy match at the block group level comparing FEMA and SBA inspections." However, due to the lack of data to conduct this analysis, TNECD does not have FEMA registration numbers or SBA Home Loan data to conduct this approved methodology.

Public Housing and Affordable Housing

Of the counties impacted by Disaster Declarations 4476, 4541 and 4609, only Davidson and Hamilton counties have Public Housing Authority assistance programs within the community. When planning for historically distressed and disadvantaged populations it should be noted that more rural counties typically have access to Public Housing Authority assistance programs located in neighboring counties, rather than in the community.

As stated in the Federal Register Notice, HUD notes: "The average cost to fully repair a home for a specific disaster to code within each of the damage categories noted above is calculated using the median real property damage repair costs determined by the SBA for its disaster loan program based on a fuzzy match at the block group level comparing FEMA and SBA inspections." However, due to the lack of data to conduct this analysis, TNECD does not have FEMA registration numbers or SBA Home Loan data to conduct this approved methodology.

Table 20: Public Housing Authorities Damaged – 2020

County/Municipality	Total # PHAs	Total PHAs Damaged	# of Units Damaged	Remaining Unmet Need
Davidson	1	1	Unknown	\$1,709,515.00
Hamilton	1	1	Unknown	\$1,203,100.00
Putnam	1	1	Unknown	\$282,702.00
Statewide	10	Unknown	Unknown	\$557,944.00
Total	13	Unknown	Unknown	\$3,753,261.00

Data Source(s): Best currently available data - FEMA Open Source

Table 21: Public Housing Authorities Damaged – 2021

County/Municipality	Total # PHAs	Total PHAs Damaged	# of Units Damaged	Remaining Unmet Need
Humphreys	1	1	Unknown	\$5,527,156.00
Statewide	2	Unknown	Unknown	\$678,767.00
Total	3	Unknown	Unknown	\$6,205,923.00

Data Source(s): Best currently available data - FEMA Open Source

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Fair Housing, Civil Rights Data and Advancing Equity

The following section provides an overview of the potential impacts and methods that TNECD will work through program implementation to mitigate its proposed CDBG-DR program impacts on federally protected classes. It also examines classes that are most at risk of impacts due to CDBGDR programs. While TNECD does not currently believe its programs will impact protected classes, National Origin, Religion, Sex – including sexual orientation and gender identity, TNECD commits to following guidance in its Analysis of Impediments to Fair Housing, affirmative marketing requirements, and offer a staff contact to address any civil rights concerns or complaints:

Race/Ethnicity

- Multifamily Housing – Challenges include, but are not limited to, historic redlining, and barriers to development of rental housing and housing for low-income people of color. Working with local jurisdictions, TNECD will provide guidance in the siting of proposed development and how it affirmatively furthers fair housing.
- Infrastructure and Public Facilities – Lack of infrastructure and public facilities investment in very rural communities across the state, including the disaster impacted have historically impacted the lives of people of color and their communities. Very rural communities continue to experience disproportionately less investment than more highly populated communities. TNECD commits itself to ensuring that activities prioritize addressing historic disparities, while aligning with new FEMA guidelines that prioritize consideration of protected classes.
- Planning – Vulnerable population are disproportionately impacted by climate change and environmental hazards. The proposed planning programs will allow disaster impacted communities to address historic inequities by updating zoning and building codes, comprehensive plans, and other documents that can benefit, rather than harm very rural communities.

Persons with Disabilities

- Multifamily Housing – Persons with disabilities are disproportionately impacted by disasters. TNECD will build out its policies and procedures to ensure multifamily properties have accessible units in CDBG-DR funded properties.
- Infrastructure and Public Facilities – All infrastructure projects are required to meet state and local standards for accessibility when needed. TNECD will work with jurisdictions to ensure that public facilities are accessible to persons with disabilities and provide further detail in its policies and procedures.
- Planning – Public meetings will be held in accessible facilities. TNECD will ensure that planning projects funded with CDBG-DR follow citizen participation requirements including accommodating reasonable accommodation requests. Furthermore, plan updates provide an opportunity to address the lack of reasonable accommodation ordinances in local plans.

Persons over the age of 65

- Multifamily Housing – As the state’s aging population continues to grow, additional demand for housing units for seniors will increase. TNECD will work with local jurisdictions to help plan for this growing need of senior housing in the disaster impacted areas.

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- Infrastructure and Public Facilities – All infrastructure projects funded by CDBG-DR must meet all state and local safety standards. TNECD will work with TEMA to ensure disaster impacted infrastructure re-opens safely for all groups, including seniors. Public facilities also present an opportunity to provide services to seniors within the disaster impacted communities.
- Planning - Community planning funded by CDBG-DR presents an opportunity to design communities that allow for aging in place for seniors across the impacted areas. Many plans also lack reasonable accommodation, which will benefit seniors with disabilities.

Persons with Limited English Proficiency

- Multifamily Housing – CDBG-DR developments will affirmatively further fair housing through outreach and marketing to people with limited English proficiency and ensure access to affordable rental units.
- Infrastructure and Public Facilities – TNECD and its subrecipients will ensure that LEP persons are aware of the resources available for language assistance for vital documents and meetings. Public facilities also present an opportunity to provide LEP services to those within the disaster impacted communities.
- Planning – CDBG-DR funded planning efforts provide an opportunity for impacted local governments to integrate Affirmatively Further Fair Housing elements including language access into planning efforts.
- TNECD will provide reasonable accommodations to LEP persons requesting accommodations. TNECD offers language assistance measures to ensure meaningful access by LEP persons to CDBG-DR programs, activities and services.

Households with Children

- Multifamily Housing – TNECD will work with local jurisdictions to create needed units of safe, affordable housing to accommodate different family sizes, including families with children.
- Infrastructure and Public Facilities – Right of way improvements for roads, water infrastructure can positively impact households with children, while public facilities will serve households with children as well. Public facilities also present an opportunity to provide services to households with children within the disaster impacted communities.
- Planning – Can address historic discriminatory practices against households with children and ensure that households with children are not exposed to environmental hazards.

TNECD does not anticipate that any of its programs will create or exacerbate barriers to housing. The programs will support communities in their development by investing in infrastructure. Multifamily housing will increase and/or improve affordable housing units that helps remove the barrier of available housing for historically distressed and disadvantaged individuals and families.

Section 109 of Title I of the Housing and Community Development Act of 1974 prohibits discrimination on the basis of race, color, national origin, sex, or religion in programs and activities receiving financial assistance from HUD's Community Development Block Grant Program. The Affirmatively Furthering Fair Housing (AFFH) goals described in HUD's Fair Housing Planning Guide the goals that grantees should try to meet. They include:

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1. Analyze and eliminate housing discrimination in the jurisdiction
2. Promote fair housing choice for all persons
3. Provide opportunities for inclusive patterns of housing occupancy regardless of race, color, religion, sex, familial status, disability and national origin
4. Promote housing that is structurally accessible to, and usable by, all persons, particularly persons with disabilities
5. Foster compliance with the nondiscrimination provisions of the Fair Housing Act

CDBG grantees are responsible for ensuring that all housing assisted with CDBG funds is made available on a non-discriminatory basis: that is, without regard to race, color, religion, sex, disability, familial status, age, or national origin. Discriminatory housing practices might include any action in which an individual or class of individuals in a specific protected class is treated differently than others who are not in that protected class, when the result of that action denies that individual or class of individuals equal access to or benefit of a housing opportunity.

The Tennessee Housing Development Authority's (THDA) last Analysis of Impediments to Fair Housing Choice was prepared in 2018 and may be found at: https://thda.org/pdf/AI-2018-Final_reduced2.pdf

This document will guide the development of TNECD's disaster recovery programs. TNECD is committed to Affirmatively Furthering Fair Housing for historically disadvantaged populations through its disaster recovery efforts. All TNECD programs comply with all relevant fair housing laws including the Fair Housing Act, Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, and the Americans with Disabilities Act as well as the Tennessee Human Rights Act & Tennessee Disability Act which prohibits discrimination related to housing, public accommodations, and employment. The Program Design section of this Action Plan provides further details on how fair housing requirements will be incorporated into CDBG-DR program design, policies and procedures, and program implementation.

TNECD understands that access to fair housing correlates to access to affordable housing. Data utilized were primarily from the U.S. Census Bureau's American Community Survey for 2013–2017 concluded that even in the absence of discrimination, persons with disabilities often experience greater obstacles in securing affordable housing that is accessible due to the potential for lower wages and rates of employment.

Some of the barriers identified in the study that still exist and can prevent impacted communities from obtaining housing include:

- Inadequate or inaccessible housing exists for families with children, the elderly, refugees and immigrants, and individuals with disabilities.
- Emphasis on credit scores that negatively impacts minorities and protected classes.
- Appraisal processes that contribute to increased devaluation of minority neighborhoods.
- Education on homeownership and renters' rights often remains available only in English, such that persons with limited English proficiency (LEP) may encounter obstacles to fair housing by virtue of language and cultural barriers. Providing language access will be essential to ensure that grantee-identified MID areas see higher participation rates due to having a higher percentage of LEP persons and a foreign-born population.

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Sexual Orientation and Gender Identity

There is limited data currently available on gender identity and sexual orientation. The most recent data available from the American Community Survey shows that Tennessee is comparable to the national average for unmarried-partner households consisting of same-sex couples. However, data on gender identity in Tennessee is currently not readily available.

Religion

Data on religious affiliation is limited. TNECD and subrecipients will communicate and coordinate with faith-based organizations over the course of the grant to evaluate unmet needs and disproportionate impacts in the impacted communities, as made aware. Based on current communications and TNECD's knowledge of the impacted areas, no religious groups or populations of specific ethnicity were disproportionately impacted by the disaster.

3. Statewide Demographics and Disaster Impacted Populations

Table 22: Grantee Demographics and Disaster Impacted Populations

Demographic	Area-Wide Estimates	Area-Wide Percent	Disaster Declaration Estimate	Disaster Declaration Percent	MID Estimates	MID Percent
Total Population	1,837,967.00	100.00%	1,837,967.00	100.00%	1,170,191.00	100.00%
Under 5 years	108,446.00	5.90%	108,446.00	5.90%	72,455.00	6.19%
65 years and over	286,360.00	15.58%	286,360.00	15.58%	167,913.00	14.35%
Population with a Disability	1,817,723.00	14.50%	1,817,723.00	14.50%	1,158,520.00	12.61%
White or Caucasian	1,381,329.00	75.16%	1,381,329.00	75.16%	788,340.00	67.37%
Black or African American	287,134.00	15.62%	287,134.00	15.62%	258,421.00	22.08%
American Indian and Alaska Native	3,566.00	0.19%	3,566.00	0.19%	2,042.00	0.17%
Asian	40,516.00	2.20%	40,516.00	2.20%	33,316.00	2.85%
Native Hawaiian and Other Pacific Islander	558.00	0.03%	558.00	0.03%	445.00	0.04%
Other	124,864.00	6.79%	124,864.00	6.79%	87,627.00	7.49%

Data Source(s): U.S. Census Bureau, 2021 American Community Survey 5-Year Estimates

Table 23: Income Demographics

Income/Economic Demographics	Statewide	Areas Impacted by Disaster	HUD MIDs
Median Household Income	\$85,028.00	\$49,596.00	\$55,398.00
Per Capita Income	\$37,638.00	\$27,801.00	\$31,942.00

Data Source(s): U.S. Census Bureau, 2021 American Community Survey 5-Year Estimates

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Table 24: Income Demographics - Low Income

Income/Economic Demographics	Statewide	Areas Impacted by Disaster	HUD MIDs
Income in the past 12 months below poverty level	14.28%	13.78%	13.89%

Data Source(s): U.S. Census Bureau, 2021 American Community Survey 5-Year Estimates

Table 25: LMI Analysis – Overall

Category	Total LMI Persons	Total Population	Percent LMI
Area wide	732,925.00	1,674,160.00	43.80%

Data Source(s): 2022 HUD LMISD Calculations

Table 26: LMI Analysis - Federally Declared Disaster Areas

County/Municipality	Non-MID-Total LMI Persons	Non-MID-Total Population	Non-MID-Percentage LMI	MID-Total LMI Persons	MID-Total Population	MID-Percentage LMI
Davidson County	0	0	0.00%	318,835	635,955	50.13%
Hamilton County	0	0	0.00%	129,915	337,530	38.49%
Humphreys County	0	0	0.00%	6,725	18,020	37.32%
Putnam County	0	0	0.00%	30,825	70,655	43.63%
Total				486,300	1,062,160	45.78%

Data Source(s): 2022 HUD LMISD Calculations

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Table 27: Grantee Demographics and Disaster Impacted Populations

DR-4476						
Demographic	Area-Wide Estimates	Area-Wide Percent	Disaster Declaration Estimate	Disaster Declaration Percent	MID Estimates	MID Percent
Total Population	996,255		996,255		787,445	
Under 5 years	62,505	6.3%	62,505	6.3%	50,622	6.4%
65 years and over	135,324	13.6%	135,324	13.6%	100,494	12.8%
Population with a Disability						
White or Caucasian	685,527	68.8%	685,527	68.8%	504,941	64.1%
Black or African American	203,817	20.5%	203,817	20.5%	190,734	24.2%
American Indian and Alaska Native	1,918	0.2%	1,918	0.2%	1,355	0.2%
Asian	28,815	2.9%	28,815	2.9%	25,856	3.3%
Native Hawaiian and Other Pacific Islander	370	0.0%	370	0.0%	310	0.0%
Other	30,133	3.0%	30,133	3.0%	26,952	3.4%

Source: U.S. Census Bureau, 2021 American Community Survey 5-Year Estimates

DR-4541						
Demographic	Area-Wide Estimates	Area-Wide Percent	Disaster Declaration Estimate	Disaster Declaration Percent	MID Estimates	MID Percent
Total Population	775,058		775,058		363,790	
Under 5 years	42,352	5.5%	42,352	5.5%	20,865	5.7%
65 years and over	140,731	18.2%	140,731	18.2%	63,641	17.5%
Population with a Disability						
White or Caucasian	639,702	82.5%	639,702	82.5%	265,862	73.1%
Black or African American	80,673	10.4%	80,673	10.4%	67,476	18.5%
American Indian and Alaska Native	1,275	0.2%	1,275	0.2%	612	0.2%
Asian	11,378	1.5%	11,378	1.5%	7,316	2.0%
Native Hawaiian and Other Pacific Islander	156	0.0%	156	0.0%	135	0.0%
Other	12,357	1.6%	12,357	1.6%	6,853	1.9%

Source: U.S. Census Bureau, 2021 American Community Survey 5-Year Estimates

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DR-4609						
Demographic	Area-Wide Estimates	Area-Wide Percent	Disaster Declaration Estimate	Disaster Declaration Percent	MID Estimates	MID Percent
Total Population	106,042		106,042		18,956	
Under 5 years	5,835	5.5%	5,835	5.5%	968	5.1%
65 years and over	18,377	17.3%	18,377	17.3%	3,778	19.9%
Population with a Disability						
White or Caucasian	97,225	91.7%	97,225	91.7%	17,537	92.5%
Black or African American	3,541	3.3%	3,541	3.3%	211	1.1%
American Indian and Alaska Native	369	0.3%	369	0.3%	75	0.4%
Asian	550	0.5%	550	0.5%	144	0.8%
Native Hawaiian and Other Pacific Islander	32	0.0%	32	0.0%	0	0.0%
Other	660	0.6%	660	0.6%	162	0.9%

Source: U.S. Census Bureau, 2021 American Community Survey 5-Year Estimates

Table 28: Households with Children under 18

DR-4476		
County	Total Households	% Households with Children under 18
Davidson	293,859	26.2%
Putnam	31,933	27.6%
Wilson	52,983	36.8%

Source: U.S. Census Bureau, 2021 American Community Survey 5-Year Estimates

DR-4541		
County	Total Households	% Households with Children under 18
Bradley	40,948	31.0%
Hamilton	147,419	26.4%

Source: U.S. Census Bureau, 2021 American Community Survey 5-Year Estimates

DR-4609		
County	Total Households	% Households with Children under 18
Dickson	19,663	30.4%
Hickman	8,736	27.2%
Houston	2,860	20.1%
Humphreys	6,688	23.1%

Source: U.S. Census Bureau, 2021 American Community Survey 5-Year Estimates

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Table 29: Income Demographics

DR-4476		
County	Median Household Income	Per Capita Income
Davidson (HUD MID)	\$66,047	\$40,962
Putnam (HUD MID)	\$49,228	\$26,602
Wilson (State MID)	\$82,224	\$39,449
Statewide	\$58,516	\$32,908

Source: U.S. Census Bureau, 2021 American Community Survey 5-Year Estimates

DR-4541		
County	Median Household Income	Per Capita Income
Bradley (State MID)	\$55,426	\$28,531
Hamilton (HUD MID)	\$61,050	\$36,964
Statewide	\$58,516	\$32,908

Source: U.S. Census Bureau, 2021 American Community Survey 5-Year Estimates

DR-4609		
County	Median Household Income	Per Capita Income
Dickson (State MID)	\$61,388	\$30,897
Hickman (State MID)	\$48,527	\$28,160
Houston (State MID)	\$46,535	\$25,233
Humphreys (HUD MID)	\$49,745	\$26,920
Statewide	\$58,516	\$32,908

Source: U.S. Census Bureau, 2021 American Community Survey 5-Year Estimates

Table 30: LMI Analysis - Federally Declared Disaster Areas

DR-4476						
County/Municipality	Non-MID-Total LMI Persons	Non-MID-Total Population	Non-MID-Percentage LMI	MID-Total LMI Persons	MID-Total Population	MID-Percentage LMI
Benton	7,665	16,080	47.7%			
Carroll	11,375	27,395	41.5%			
Davidson				318,835	635,955	50.1%
Putnam				30,825	70,655	43.6%
Smith	7,510	18,900	39.7%			
Wilson	43,645	120,965	36.1%			
Total	70,195	183,340	38.3%	349,660	706,610	49.5%

Source: 2022 HUD LMISD Calculations

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DR-4541						
County/Municipality	Non-MID-Total LMI Persons	Non-MID-Total Population	Non-MID-Percentage LMI	MID-Total LMI Persons	MID-Total Population	MID-Percentage LMI
Bradley	36,780	99,140	37.1%			
Hamilton				129,915	337,530	38.5%
Marion	12,360	28,025	44.1%			
Monroe	19,415	44,745	43.4%			
Polk	6,540	16,440	39.8%			
Scott	10,370	21,710	47.8%			
Unicoi	8,195	17,535	46.7%			
Washington	44,785	120,470	37.2%			
Total	138,445	348,065	39.8%	129,915	337,530	38.5%

Source: 2022 HUD LMISD Calculations

DR-4609						
County/Municipality	Non-MID-Total LMI Persons	Non-MID-Total Population	Non-MID-Percentage LMI	MID-Total LMI Persons	MID-Total Population	MID-Percentage LMI
Dickson	25,105	49,825	50.4%			
Hickman	9,570	22,700	42.2%			
Houston	3,310	8,070	41.0%			
Humphreys				6,725	18,020	37.3%
Total	37,985	80,595	47.1%	6,725	18,020	37.3%

Source: 2022 HUD LMISD Calculations

Table 31: Limited English Proficiency

DR-4476		
County	Number of People Who Speak English Less than 'Very Well'	Percent of People Who Speak English Less than 'Very Well'
Davidson	33,737	5.1%
Putnam	1,019	1.4%
Wilson	2,034	1.5%

Source: U.S. Census Bureau, 2021 American Community Survey 5-Year Estimates

DR-4541		
County	Number of People Who Speak English Less than 'Very Well'	Percent of People Who Speak English Less than 'Very Well'
Bradley	1,997	2.0%
Hamilton	8,184	2.4%

Source: U.S. Census Bureau, 2021 American Community Survey 5-Year Estimates

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DR-4609		
County	Number of People Who Speak English Less than 'Very Well'	Percent of People Who Speak English Less than 'Very Well'
Dickson	245	0.5%
Hickman	154	0.7%
Houston	0	0.0%
Humphreys	34	0.2%

Source: U.S. Census Bureau, 2021 American Community Survey 5-Year Estimates

Table 32: Affected Continuum of Care Entities

DR-4476			
CoC Number	CoC Entity	Impacted County	Homeless Count
TN-504	Nashville-Davidson County CoC	Davidson	1,916
TN-506	Upper Cumberland CoC	Putnam, Wilson	382

Source: HUD

DR-4541			
CoC Number	CoC Entity	Impacted County	Homeless Count
TN-500	Chattanooga/Southeast Tennessee CoC	Bradley, Hamilton	3,392

Source: HUD

DR-4609			
CoC Number	CoC Entity	Impacted County	Homeless Count
TN-503	Central Tennessee CoC	Dickson, Hickman, Houston, Humphreys	387

Source: HUD

Table 33: Point-in-Time Count by Type of Shelter

CoC Number	Emergency Shelter	Transitional Housing	Unsheltered Homeless	Total Known Homeless
TN-504	1,037	245	634	1,916
TN-506	150	6	226	382
TN-500	203	17	3,172	3,392
TN-503	202	91	94	387

Source: HUD

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Table 34: Infrastructure Unmet Needs

Infrastructure Unmet Needs – 2020 Disaster Damage and Impacts

County	A - Debris Removal	B - Protective Measures	C - Roads and Bridges	D - Water Control Facilities	E - Public Buildings	F - Public Utilities	G - Recreational or Other	Z - State Management	Total
Benton	\$71,810.16	\$6,587.43	\$0.00	\$0.00	\$0.00	\$64,802.09	\$0.00	\$4,716.72	\$147,916.40
Bradley	\$1,164,098.66	\$164,786.07	\$68,819.78	\$0.00	\$0.00	\$576,888.43	\$0.00	\$0.00	\$1,974,592.94
Carroll	\$0.00	\$7,128.54	\$0.00	\$0.00	\$0.00	\$199,953.97	\$0.00	\$2,151.28	\$209,233.79
Davidson	\$6,961,226.84	\$6,931,657.60	\$67,591.31	\$0.00	\$1,651,413.68	\$24,586.25	\$25,058.70	\$772,034.51	\$16,433,568.89
Hamilton	\$12,787,874.69	\$3,613,590.28	\$459,159.91	\$0.00	\$127,318.10	\$31,934,532.96	\$129,273.10	\$182,018.37	\$49,233,767.41
Marion	\$212,021.51	\$0.00	\$130,593.41	\$0.00	\$0.00	\$18,821.54	\$13,614.49	\$792.46	\$375,843.41
Monroe	\$46,335.69	\$0.00	\$169,748.31	\$0.00	\$0.00	\$0.00	\$0.00	\$342.00	\$216,426.00
Polk	\$120,669.88	\$7,001.88	\$141,217.89	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$268,889.65
Putnam	\$2,493,676.32	\$979,212.42	\$0.00	\$0.00	\$300,343.50	\$509,337.35	\$0.00	\$46,651.78	\$4,329,221.37
Scott	\$61,582.60	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$299.13	\$61,881.73
Smith	\$22,322.04	\$3,368.84	\$0.00	\$0.00	\$0.00	\$22,500.00	\$0.00	\$0.00	\$48,190.88
Unicoi	\$92,016.87	\$0.00	\$136,237.77	\$0.00	\$0.00	\$39,171.74	\$0.00	\$9,285.35	\$276,711.73
Washington	\$0.00	\$34,529.09	\$0.00	\$0.00	\$0.00	\$15,684.58	\$0.00	\$0.00	\$50,213.67
Wilson	\$2,725,462.17	\$644,170.90	\$7,733.00	\$0.00	\$170,782.03	\$61,055.62	\$0.00	\$65,361.49	\$3,674,565.21
Statewide	\$2,378,422.36	\$6,331,705.87	\$70,080.55	\$0.00	\$2,914,077.22	\$24,474,091.28	\$30,486.67	\$2,426,868.81	\$38,625,732.76
Total	\$29,137,519.79	\$18,723,738.92	\$1,251,181.93	\$0.00	\$5,163,934.53	\$57,941,425.81	\$198,432.96	\$3,510,521.90	\$115,926,755.84

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Infrastructure Unmet Needs – 2021 Disaster Damage and Impacts

County	A - Debris Removal	B - Protective Measures	C - Roads and Bridges	D - Water Control Facilities	E - Public Buildings	F - Public Utilities	G - Recreational or Other	Z - State Management	Total
Dickson	\$146,350.35	\$6,290.35	\$231,341.82	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$383,982.52
Hickman	\$41,875.77	\$0.00	\$197,223.17	\$0.00	\$0.00	\$118,256.96	\$0.00	\$7,845.68	\$365,201.58
Houston	\$28,536.27	\$7,949.34	\$878,385.80	\$7,605.00	\$0.00	\$0.00	\$0.00	\$1,662.62	\$924,139.03
Humphreys	\$3,034,043.32	\$11,441,096.27	\$6,988,255.09	\$0.00	\$125,321.97	\$1,717,655.96	\$304,969.49	\$0.00	\$23,611,342.10
Total	\$3,250,805.71	\$11,455,335.96	\$8,295,205.88	\$7,605.00	\$125,321.97	\$1,835,912.92	\$304,969.49	\$9,508.30	\$25,284,665.23

Table 35: Total Cost and Need by PA Category

PA Category	Estimated PA Cost	Local Match	Resiliency	Total Need (Match + Resiliency)
A - Debris	\$32,388,325.50	\$3,598,702.82	\$0.00	\$35,987,028.32
B - Emergency Measures	\$30,179,074.88	\$3,368,546.87	\$0.00	\$33,547,621.75
C - Roads and Bridges	\$9,546,387.81	\$1,060,709.73	\$0.00	\$10,607,097.54
D - Water Control Facilities	\$7,605.00	\$845.00	\$0.00	\$8,450.00
E - Building and Equipment	\$5,289,256.50	\$587,695.16	\$0.00	\$5,876,951.66
F - Utilities	\$59,777,338.73	\$6,641,926.50	\$0.00	\$66,419,265.23
G - Other	\$503,402.45	\$55,933.61	\$0.00	\$559,336.06
Total	\$137,691,390.87	\$15,314,359.69		\$153,005,750.56

Data Source(s): Currently available Open FEMA data.

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Economic Revitalization Unmet Need

At the time of the development of the initial development of this Action Plan, TNECD only had access to publicly available SBA Disaster Loan Data. Based on this information we can account for \$67,391,896.03 in Total Verified Loss to businesses. Approximately 87% of losses to businesses occurred in the four HUD-identified MID counties. The Total Amount of Approved Loans through SBA for all three disasters was \$11,138,600.00, leaving a Total Unmet Need of \$56,253,296.03.

Though the Total Verified Loss and Total Unmet Need amounts are relatively significant, the number of claims and approved loans are relatively small at just 72 total claims across all disasters in the HUD and State-identified MID areas and 25 approved loans.

In FEMA's "Make Your Business Resilient", the agencies notes that between 40% and 60% that are impacted by a disaster and 90% of businesses that do not reopen with 5 days close permanently. More than 3 years have passed since disasters DR-4476-TN and DR-4541-TN occurred and nearly 2 years since DR-4609-TN has occurred. Undoubtedly unmet needs for businesses may still exist, but coupling the length of time that has passed and the fact that through outreach TNECD has not learned of economic development unmet needs, we anticipate the real remaining unmet need is lower than the SBA data represents.

Table 8: Total Business Loans Approved by the SBA

DR-4476			
County	Business/EIDL Loans	Total Business/EIDL Loan Applications	Total Approved
Davidson	34	34	11
Putnam	3	3	3
Wilson	6	6	5

Source: SBA

DR-4541			
County	Business/EIDL Loans	Total Business/EIDL Loan Applications	Total Approved
Bradley	2	2	0
Hamilton	14	14	3

Source: SBA

DR-4609			
County	Business/EIDL Loans	Total Business/EIDL Loan Applications	Total Approved
Dickson	3	3	1
Hickman	3	3	0
Houston	2	2	0
Humphreys	5	5	2

Source: SBA

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Table 9: SBA Business Loan Data

DR-4476			
Damaged Property County Name	Total Verified Loss	Total Approved Loan Amount	Total Unmet Need
Davidson	\$16,074,958.20	\$3,445,100	\$12,629,858.20
Putnam	\$1,433,866.71	\$1,073,000.00	\$360,866.71
Wilson	\$5,560,418.93	\$1,316,400.00	\$4,244,018.93

Source: SBA

DR-4541			
Damaged Property County Name	Total Verified Loss	Total Approved Loan Amount	Total Unmet Need
Bradley	\$736,859.61	\$0.00	\$736,859.61
Hamilton	\$27,817,323.83	\$425,600.00	\$27,391,723.83

Source: SBA

DR-4609			
Damaged Property County Name	Total Verified Loss	Total Approved Loan Amount	Total Unmet Need
Dickson	\$2,163,392.52	\$1,755,300.00	\$408,092.52
Hickman	\$5,000.00	\$0.00	\$5,000.00
Houston	\$19,975.00	\$0.00	\$19,975.00
Humphreys	\$13,580,101.23	\$3,123,200.00	\$10,456,901.23

Source: SBA

Disaster Damage and Impacts - Economic Revitalization

At the time of the development of the initial development of this Action Plan, TNECD did not yet have a data sharing agreement in place to receive full data from FEMA Individual Assistance, or SBA Home Loan data. Statewide there are 10 counties identified as economically distressed and 30 identified as economically at-risk, although there are none in the 2020 declared counties. In the 2021 disaster declaration there is one county bordering Humphreys County that is identified as distressed (Perry) and 3 border counties (Benton, Decatur & Houston) that are at-risk.

Mitigation Only Activities

The Mitigation Needs Assessment is a risk-based assessment that summarizes the natural threats and hazards in the counties HUD and the State defined as Most Impacted and Distressed (MID) by the 2020 and 2021 disasters. The current Tennessee Emergency Management Plan (TEMP) examines natural hazards and mitigation activities across Tennessee. The legal authority of the TEMP is cited in the T.C.A. § 58-2-106(b)(1). The T.C.A. § 58-2-106(b)(1) states that the Tennessee Emergency Management Agency (TEMA) is the responsible state agency for preparing and maintaining the TEMP.

The Tennessee Emergency Management Plan (TEMP) is recognized as the official State Hazard Mitigation Planning document. In it the State has identified 13 Hazards of Prime Concern, which are:

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1. Drought,
2. Earthquake,
3. Extreme Temperature,
4. Wildfire,
5. Flood,
6. Geologic,
7. Severe Weather,
8. Tornado,
9. Communicable Disease,
10. Dam/Levee Failure,
11. Hazardous Material Release,
12. Terrorism, and
13. Infrastructure Incident.

Each local jurisdiction has procurement policies that rate cost/ benefits to choose projects that best fit their community to maximize their use of CDBG-DR funds.

The TEMP ensures that the State of Tennessee has a documented Comprehensive Emergency Management program and planning process that addresses:

All-hazards (natural, technological/accidental, & human-caused hazards);

All-phases (prevention, protection, mitigation, response, & recovery phases); and

All-stakeholders (local government, state government, federal government, private sector, volunteers, citizens, & non-governmental organization stakeholders).

Hazard Analysis identifies and analyzes those hazards that have historically caused or could potentially cause significant threats to life, health, social welfare, and the economy. The TEMP also assesses the current strengths and weaknesses of the State's hazard mitigation and emergency management capabilities and resources, examines specific hazard mitigation measures that have been undertaken, and recommends both short-term and long-term hazard mitigation opportunities that the state should consider implementing. The TEMP is required by FEMA for states to access Hazard Mitigation Assistance funds.

Each local jurisdiction additionally has a FEMA-approved Hazard Mitigation plan. Once TNECD begins working with the impacted local governments to develop and design activities, mitigation only activities will be better identified, guided by each jurisdiction's plan. All activities developed and funded under these grants will be eligibility and National Objective requirements and criteria and defined in Public Law 117-43 and the subsequent Federal Register notices that guide the program.

4. General Requirements

Citizen Participation

In the development of this disaster recovery action plan, the State of Tennessee, Department of Economic and Community Development (TNECD) consulted with disaster-affected stakeholders, local governments, public housing authorities, and other affected parties in the surrounding geographic area to ensure consistency of disaster impacts identified in the plan, and that the plan and planning process was comprehensive and inclusive.

Tennessee's Language Access Plan is maintained by the Tennessee Housing Development Agency (THDA) Civil Rights Compliance Officer. The State also uses Avaza for customer service calls that need real time translation. For the service areas from the 2020 and 2021 disasters less than 10% of the population is non-English speaking. Translation services will be provided as determined to be appropriate by data analysis, and will adapt throughout the grant term to meet the needs of historically distressed and disadvantaged populations. TNECD has adopted the State's Language Access Plan and relevant links may be found at:

Language Access Plan - <https://thda.org/pdf/Language-Access-Plan-Final.pdf>
Title VI Plan - <https://thda.org/pdf/THDA-TitleVI-Plan-2019.2020.Appendices.pdf>

In addition to the activities above, TNECD has published this action plan on <https://www.tn.gov/ecd/community-development-block-grant/cdbg/cdbg-disaster-program.html> for a 30-day public comment period. Citizens were notified through publication of the public meeting notice in the Chattanooga Time Free Press, Citizen-Herald, Johnson City Press, and The Tennessean. Additionally, TNECD emailed notification of the public meeting to local city and county mayors and officials, local development districts, grant administrators, and consulting engineers, architects, and other professionals. The State of Tennessee will ensure that all citizens have equal access to information, including persons with disabilities and limited English proficiency (LEP) upon request. Public meetings are held in facilities that are physically accessible to persons with disabilities under the Fair Housing Act Section 504 and the Americans with Disabilities Act (ADA).

A summary of citizen comments on this action plan, along with TNECD responses, is in Appendix C of this document.

For more information, citizens can refer to the State of Tennessee citizen participation plan that can be found at https://thda.org/pdf/Updated-Citizen-Participation-Plan-per-09_2014-Sub-Amendment.pdf

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Meeting Accessibility Standards & Reasonable Accommodations

TNECD will uphold accessibility standards in the administration and disbursement of funds. As with other CDBG programs, TNECD has adopted a Section 504/Americans with Disabilities Act (ADA) policy which ensures the full right to reasonable accommodations to encourage public participation.

Complaints

The State of Tennessee will follow the policies and procedures for Fraud, Waste, and Abuse on the Tennessee Comptroller's website: <https://comptroller.tn.gov/office-functions/investigations/fraud-waste-and-abuse.html>. The website provides instructions and guidance for citizens, auditors, and public officials. Anyone can submit a report of Fraud, Waste, and Abuse using this online form: <https://apps.cot.tn.gov/ANTS/Submission/Submit>. Any reports of Fraud, Waste, and Abuse to the state related to these grants or activities funded in part or whole under this grant will be made available to HUD.

Complaints alleging violation of fair housing laws will be directed to FHEO for immediate review.

Complaints regarding fraud, waste, or abuse of funds will be forwarded to the HUD OIG Fraud Hotline (phone: 1-800-347-3735 or email: hotline@hudoig.gov) and/or the FHEO Region 4 Office (phone: 1-800-440-8091 or email: complaintsoffice04@hud.gov).

Public Website

TNECD will maintain a public website that provides information accounting for how all grant funds are used, managed, and administered, including links to all disaster recovery action plans, action plan amendments, program policies and procedures, performance reports, citizen participation requirements, and activity and program information described in this plan, and details of all contracts and ongoing procurement processes.

These items are made available through <https://www.tn.gov/ecd/community-development-block-grant/cdbg/cdbg-disaster-program.html>. Specifically, TNECD will make the following items available: the action plan created using DRGR (including all amendments); each QPR (as created using the DRGR system); citizen participation plan; procurement policies and procedures; all executed contracts that will be paid with CDBG-DR funds as defined in 2 CFR 200.22 (including subrecipients' contracts); and a summary including the description and status of services or goods currently being procured by the grantee or the subrecipient (e.g., phase of the procurement, requirements for proposals, etc.). Contracts and procurement actions that do not exceed the micro-purchase threshold, as defined in 2 CFR 200.67, are not required to be posted to a grantee's website.

In addition, TNECD will maintain a comprehensive website regarding all disaster recovery activities assisted with these funds. The website will be updated in a timely manner to reflect the most up-to-date information about the use of funds and any changes in policies and procedures, as necessary. At a minimum, updates will be made quarterly.

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Amendments

Over time, recovery needs will change. TNECD will amend the disaster recovery action plan as often as necessary to best address long-term recovery needs and goals. This plan describes proposed programs and activities. As programs and activities develop overtime an amendment may not be triggered if the program or activity is consistent with the descriptions provided in this plan.

Substantial Amendment

A change to this action plan is considered to be a substantial amendment if it meets the following criteria:

- A change in program benefit or eligibility criteria
- The addition or deletion of an activity
- A proposed reduction in the overall benefit requirement
- The allocation or reallocation of which constitutes a change of 25% or greater of a program budget

When TNECD pursues the substantial amendment process, the amendment will be posted here at <https://www.tn.gov/eecd/community-development-block-grant/cdbg/cdbg-disaster-program.html> for a 30-day public comment period. The amendment will be posted in adherence with ADA and LEP requirements. TNECD will review and respond to all public comments received and submit to HUD for approval.

Non-Substantial Amendment

A non-substantial amendment is an amendment to the plan that includes technical corrections and clarifications and budget changes that do not meet the monetary threshold for substantial amendments to the plan and does not require posting for public comment. The State of Tennessee will notify HUD five (5) business days before the change is effective.

All amendments will be numbered sequentially and posted to the website into one final, consolidated plan.

Displacement of Persons and Other Entities

TNECD does not anticipate that any of its programs will create or exacerbate barriers to housing. The programs will support communities in their development by investing in infrastructure and housing. The multifamily housing program will increase and/or improve affordable housing units that helps remove the barrier of available housing. To minimize the displacement of persons and other entities that may be affected by the activities outlined in this Action Plan, TNECD and its subrecipients will coordinate with applicable agencies and entities to ensure that all programs are administered in accordance with the Uniform Relocation Assistance and Real Property Acquisition Act (URA) of 1970, as amended (49 CFR Part 24) and Section 104(d) of the Housing and

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Community Development Act of 1974, as amended, and implementing regulations at 24 CFR Part 570.496(a).

These regulations and requirements apply to both property owners and tenants in the event that proposed projects cause the displacement of persons or other entities. TNECD will include detailed policies and procedures for when proposed programs or projects could potentially cause the displacement of people or other entities. TNECD also will budget to cover the costs involved in implementing those policies and procedures. Currently, it is not anticipated that proposed programs will cause displacement.

CDBG-DR funds may not be used to support any federal, State, or local projects that seek to use the power of eminent domain, unless eminent domain is employed only for a public use. None of the currently planned projects under this Action Plan contemplate the use of eminent domain.

TNECD will draw on existing Residential Anti displacement and Relocation Assistance Plans (RARAPs) and will adapt them to meet the URA, Section 104(d), and related waivers and the alternative requirements specified in the Consolidated Notice. The adapted RARAP also will be updated prior to implementing any activity with CDBG-DR grant funds.

Any use of funds for mass transit, railroad, airport, seaport or highway projects, as well as utility projects which benefit or serve the general public (including energy related, communication related, water related, and wastewater-related infrastructure), other structures designated for use by the general public or which have other common-carrier or public-utility functions that serve the general public and are subject to regulation and oversight by the government, and projects for the removal of an immediate threat to public health and safety or brownfields as defined in the Small Business Liability Relief and Brownfields Revitalization Act (Pub. L. 107– 118) shall be considered a public use for purposes of eminent domain.

Protection of People and Property

TNECD will leverage CDBG-DR funds to build economic and disaster resilience into all recovery programs and activities. The Action Plan, as written, intends to promote mitigation, rehabilitation and elevation of existing structures and properties, and implement green building standards. TNECD and its subrecipients will ensure that all newly constructed buildings meet all locally adopted building codes, standards, and ordinances in addition to the requirements of applicable Federal Register notices for this grant. Future property damage will be minimized by requiring that any rebuilding be done according to the best available science for that area with respect to base flood elevations.

In Tennessee local jurisdictions may “opt-out” of building code requirements. The Tennessee Emergency Management Agency’s State Hazard Mitigation Plan has identified the top five Hazards of Prime Concern as priorities: 1) Drought, 2) Earthquake, 3) Extreme Temperature, 4) Wildfire, and 5) Flood. Each local jurisdiction in the disaster declaration area has a FEMA-approved Hazard Mitigation Plan that is informing their planning. TNECD has held preliminary planning meetings with each of the impacted jurisdictions and other relevant state agencies and will continue to collaborate with these stakeholders at each stage of project development.

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TNECD and its subrecipients will incorporate uniform best practices of construction standards for all construction contractors performing work in all relevant jurisdictions. As required in 2 CFR 200.321, TNECD will take all necessary steps to assure minority owned businesses and women's business enterprises are used when possible. Those steps include:

- Placing qualified small and minority businesses and women's business enterprises on solicitation lists;
- Assuring that small and minority businesses, and women's business enterprises are solicited whenever they are potential sources;
- Dividing total requirements, when economically feasible, into smaller tasks or quantities to permit maximum participation by small and minority businesses, and women's business enterprises;
- Using the services and assistance, as appropriate, of such organizations as the Small Business Administration; and
- Requiring prime contractors to take the affirmative steps listed above.

Promoting Sound, Sustainable Long-Term Recovery Planning

Informed by a post-disaster evaluation of natural hazard risks, TNECD has allocated some funding toward planning activities. One of the primary purposes is to promote sound, sustainable long-term recovery that accounts for an understanding of current and projected natural hazard risks, including climate-related hazards. In addition to planning activities, TNECD will fund infrastructure improvements to address unmet recovery and mitigation needs associated with general infrastructure and public facilities. Grant funds will allow recipients to design and construct infrastructure that is directly benefiting individuals and the larger community.

Elevation Standards

For new construction, repair of substantially damaged, or substantial improvement structures principally for residential use and located in the 1 percent annual (or 100-year) floodplain must be elevated with the lowest flood, including the basement, at least two feet above the 1 percent annual floodplain elevation.

Mixed-use structures with no dwelling units and no residents must be elevated or floodproofed up to at least two feet above base flood elevation. If a structure is located in a 500-year floodplain, the structure must be elevated three feet above the 100-year floodplain. Designs will accommodate persons with a disability under the Fair Housing Act, Section 504 and the Americans with Disabilities Act (ADA).

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Flood Insurance Requirements

Assisted property owners must comply with all flood insurance requirements. HUD-assisted homeowners for a property located in a Special Flood Hazard Area must obtain and maintain flood insurance in the amount and duration prescribed by FEMA’s National Flood Insurance Program (NFIP). TNECD may not provide disaster assistance for the repair, replacement, or restoration of a property to a person who has received Federal flood disaster assistance that was conditioned on obtaining flood insurance and then that person failed to obtain or allowed their flood insurance to lapse for the property. TNECD is prohibited by HUD from providing CDBG-DR assistance for the rehabilitation or reconstruction of a house if:

- The combined household income is greater than 120% AMI or the national median,
- The property was located in a floodplain at the time of the disaster, and
- The property owner did not maintain flood insurance on the damaged property.

To ensure adequate recovery resources are available to LMI homeowners who reside in a floodplain but who are unlikely to be able to afford flood insurance may receive CDBG-DR assistance if:

- The homeowner had flood insurance at the time of the qualifying disaster and still has unmet recovery needs, or
- The household earns less than 120% AMI or the national median and has unmet recovery needs.

Construction Standards

TNECD plans to provide support and technical assistance to encourage local jurisdictions adopt standards that are appropriate to their community. Projects will demonstrate a tie-back to current FEMA-approved Hazard Mitigation Plans and the disasters funded in this grant. Designs will accommodate persons with a disability under the Fair Housing Act, Section 504 and the Americans with Disabilities Act (ADA). The Tennessee Housing Development Agency (THDA) Minimum Design Standards for New Construction of Single Family & Multifamily Housing Units, which require, at a minimum, green and resilient building, and universal design, may be used to guide project design.

The definition of substantial damage is defined in 44 CFR 59.1 and applies to any reconstruction, rehabilitation, addition or other improvement to a structure, the total cost of which equals or exceeds 50 percent of the market value of the structure before the start of construction of the improvement. TNECD will require quality inspections and code compliance inspections on all projects and places an emphasis on high-quality, durable, sustainable, and energy efficient construction methods and materials. Site inspections will be required on all projects to ensure quality and compliance with building codes.

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All rehabilitation, reconstruction, or new construction must meet an industry-recognized standard that has achieved certification under at least one of the following programs:

- Energy STAR (Certified Homes or Multifamily High Risk)
- Enterprise Green Communities
- LEED (New Construction, Homes, Midrise, Existing Building Operations and Maintenance or Neighborhood Development)
- ICC- 700 National Green Building Standards
- EPA Indoor AirPlus
- Any other equivalent comprehensive green building standard program acceptable to HUD

Rather than be limited by a single green building design technique, TNECD will encourage new construction to meet the best fit for new construction out of many possible approaches. TNECD will implement and monitor construction results to ensure the safety of residents and the quality of construction completed through this funding.

All new housing created in whole or in part with CDGB-DR funds will comply with current HUD Housing Quality Standards (HQS). Rehabilitation of non-substantially damaged structures shall comply with the HUD CPD Green Building Retrofit Checklist, available at <https://www.hudexchange.info/resource/3684/guidance-on-the-cpdgreen-building-checklist/>, to the extent that the items on the checklist are applicable to the rehabilitation. TNECD will encourage use of the guidance document, FEMA P-798, Natural Hazards and Sustainability for Residential Buildings.

For rehabilitation of non-substantially damaged residential buildings, TNECD will follow the guidelines to the extent applicable as specified in the [HUD CPD Green Building Retrofit Checklist](#). When older or obsolete products are replaced as part of rehabilitation work, the rehabilitation is required to use ENERGY STAR-labeled, WaterSense-labeled, or Federal Energy Management Program (FEMP)-designed products and appliances.

For infrastructure projects, TNECD will encourage, to the extent practicable, implementation of state requirements and accepted industry standards. Additionally, subrecipients will be required to provide detail in the development of activities for funding how the design of the activities and the implementation will promote mitigation against future natural disasters and/or lessen the risks for adverse impacts.

Contractors Standards

Contractors selected under TNECD will make every effort to provide opportunities to low and very-low income persons by providing resources and information to notify Section 3 individuals and businesses of opportunities in the community. TNECD will report Section 3 accomplishments in the Disaster Recovery Grant Reporting (DRGR) system.

All contractors must also possess a current Business License. Construction contractors will be required to carry the required licenses and insurance coverage(s) for all work performed, and contractors will be required to provide a warranty period for all work performed.

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Preparedness, Mitigation and Resiliency

Resilience is defined as a community's ability to minimize damage and recover quickly from extreme events and changing conditions, including natural hazard risks. TNECD will work with other state departments, namely TEMA, TDEC and THDA, and local governments to clearly define how activities will fit and compliment other actions and programs that are being used to rebuild the affected communities while looking toward the future and protecting and advancing opportunities for vulnerable populations.

Broadband Infrastructure in Housing

Any substantial rehabilitation or new construction of a building with more than four (4) rental units will include installation of broadband infrastructure, except when:

- The location of the new construction or substantial rehabilitation makes the broadband infrastructure infeasible,
- The cost of installing broadband infrastructure would result in a fundamental alteration in the nature of its program or activity or in an undue financial burden, or
- The structure of the housing to be substantially rehabilitated makes installation of broadband infrastructure infeasible.

Activities that include and impact broadband infrastructure will be coordinated with the Tennessee State Broadband Office and the local internet service providers.

Cost Reasonableness & Project Construction Costs

As set in HUD's Federal Register Notice, 87 FR 31636, construction activities that utilize CDBG-DR funds, including the mitigation set-aside, must be reasonable and consistent with market costs at the time and place of construction or procurement. To comply with this requirement, TNECD will follow the procedures outlined in its Procurement Manual to complete and document independent cost estimates (ICE), cost or price analyses, and cost reasonableness determinations within each of its procurements. Additionally, selected subrecipients must establish similar processes to those outlined above to ensure proper cost controls. TNECD will review such processes and procedures on an ongoing basis as part of its monitoring procedures.

The State will establish policies and procedures to assess the cost-effectiveness of each proposed program or activity to assist a household under any residential rehabilitation or reconstruction program or activity funded with CDBG-DR funds. Policies and procedures also will establish the criteria for determining when the cost of the rehabilitation or reconstruction of the unit will not be cost-effective relative to other means of assisting the property owner.

Selected subrecipients must also consider the costs and benefits of incorporating hazard mitigation measures to protect against the specifically identified impacts of future extreme weather events and other natural hazards. These controls will be reviewed during a capacity and risk assessment prior to subrecipient selection. Other parameters regarding cost reasonableness requirements will also be outlined within the policies and procedures for each program.

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TNECD will define “demonstrable hardship” as experiencing conditions such as continued financial hardships, impacts from Covid-19 on the affordability of the housing stock or residing in unsafe or unsanitary living conditions as a result of the 2020 and 2021 disasters.

TNECD defines a residential property as “not suitable for rehabilitation” if any of these conditions apply:

- The property is declared a total loss.
- Repairs would exceed 50% of the cost of reconstruction.
- Repairs would exceed 50% of the pre-disaster fair market value
- Homes cannot be rehabilitated or reconstructed in place under existing agency policies and award caps due to legal, engineering, or environmental constraints, such as permitting, extraordinary site conditions, or historic preservation.

The State may provide exceptions to award maximums on a case-by-case basis and will include procedures within program guidelines on how the State or its subrecipients will analyze the circumstances under which an exception is needed, and the amount of assistance necessary and reasonable.

Duplication of Benefits

Section 312 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act, as amended, generally prohibits any person, business concern, or other entity from receiving financial assistance with respect to any part of a loss resulting from a major disaster for which such person, business concern, or other entity has received financial assistance under any other program or from insurance or any other source.

To comply with Section 312, TNECD shall ensure that each program and activity provides assistance to a person or entity only to the extent that the person or entity has a disaster recovery need that has not been fully met.

TNECD is in the process of developing a Duplication of Benefits Policy for the covered grants, and its subrecipients are subject to the requirements in Federal Register notices explaining the duplication of benefit requirement (84 FR 28836 and 84 FR 28848, published June 20, 2019, or other applicable notices).

5. Program Budget

Overview

The Tennessee Department of Economic and Community Development is the lead agency and responsible entity for administering \$42,740,000 in 2020 CDBG-DR funds and \$42,005,000 in 2021 CDBG-DR funds allocated for disaster recovery programs. These programs include housing rehabilitation, construction of new housing, rehabilitation and improvement of water, sewer, and other community infrastructure, assistance to affected businesses, planning activities, and targeted public services.

The preliminary program budget has been developed based on the publicly available FEMA data to identify areas of disaster impacts and unmet recovery needs. At this point, housing and infrastructure are where the most costly and widespread impacts occurred, and these seem to be where the most unmet needs still exist. As additional information is collected and analyzed, and as other sources of funding are identified and used, the program budget will be updated and adjusted accordingly.

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Table 36: Program Budget – 2020

Program Category	Program	Budget	HUD identified MID Budget	Grantee identified MID Budget	% of Allocation	Maximum Award	National Objective	Estimated Outcome
Housing	Rehab	\$5,000,000.00	\$4,000,000.00	\$1,000,000.00	11.70%	\$4,000,000.00	LMI	40 units rehabbed
	New Construction	\$15,000,000.00	\$12,000,000.00	\$3,000,000.00	35.10%	\$12,000,000.00	LMI	70 new housing units constructed
Economic Revitalization	Business Grants	\$0.00	\$0.00	\$0.00	0.00%	\$0.00	N/A	N/A
	Other	\$0.00	\$0.00	\$0.00	0.00%	\$0.00	N/A	N/A
Infrastructure	Water/sewer Improvements	\$5,028,000.00	\$4,022,400.00	\$1,005,600.00	11.76%	\$4,022,400.00	LMI, UN	Unknown. Will be activity specific.
	Other	\$10,000,000.00	\$8,000,000.00	\$2,000,000.00	23.40%	\$8,000,000.00	LMI, UN, SB	Unknown. Will be activity specific.
Public Services	Legal Services	\$0.00	\$0.00	\$0.00	0.00%	\$0.00	N/A	N/A
	Housing Counseling	\$0.00	\$0.00	\$0.00	0.00%	\$0.00	N/A	N/A
	Other	\$0.00	\$0.00	\$0.00	0.00%	\$0.00	LMI, UN	N/A
Mitigation	Mitigation	\$5,575,000.00	\$4,460,000.00	\$1,115,000.00	13.04%	\$4,460,000.00	LMI, UN, SB	Unknown. Will be activity specific.
Admin	Admin	\$2,137,000.00	\$1,709,600.00	\$427,400.00	5.00%	\$0.00	N/A	N/A
Planning	Planning	\$0.00	\$0.00	\$0.00	0.00%	\$0.00	N/A	N/A
Total		\$42,740,000.00	\$34,192,000.00	\$8,548,000.00	100.00%			

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Table 37: Program Budget – 2021

Program Category	Program	Budget	HUD identified MID Budget	Grantee identified MID Budget	% of Allocation	Maximum Award	National Objective	Estimated Outcome
Housing	Rehab	\$5,700,000.00	\$4,560,000.00	\$1,140,000.00	13.57%	\$4,560,000.00	LMI	40 units rehabbed
	New Construction	\$11,000,000.00	\$8,800,000.00	\$2,200,000.00	26.19%	\$8,800,000.00	LMI	70 new housing units constructed
Economic Revitalization	Business Grants	\$0.00	\$0.00	\$0.00	0.00%	\$0.00	N/A	N/A
	Other	\$0.00	\$0.00	\$0.00	0.00%	\$0.00	N/A	N/A
Infrastructure	Water/sewer Improvements	\$11,000,000.00	\$8,800,000.00	\$2,200,000.00	26.19%	\$8,800,000.00	LMI, UN	Unknown. Will be activity specific.
	Other	\$5,700,000.00	\$4,560,000.00	\$1,140,000.00	13.57%	\$4,560,000.00	LMI, UN, SB	Unknown. Will be activity specific.
Public Services	Legal Services	\$0.00	\$0.00	\$0.00	0.00%	\$0.00	N/A	N/A
	Housing Counseling	\$0.00	\$0.00	\$0.00	0.00%	\$0.00	N/A	N/A
	Other	\$0.00	\$0.00	\$0.00	0.00%	\$0.00	LMI, UN	N/A
Mitigation	Mitigation	\$5,500,000.00	\$4,400,000.00	\$1,100,000.00	13.09%	\$4,400,000.00	LMI, UN, SB	Unknown. Will be activity specific.
Admin	Admin	\$2,100,250.00	\$1,680,200.00	\$420,050.00	5.00%	\$0.00	N/A	N/A
Planning	Planning	\$1,004,750.00	\$803,800.00	\$200,950.00	2.39%	\$803,800.00	N/A	3 planning activities
Total		\$42,005,000.00	\$33,604,000.00	\$8,401,000.00	100.00%			

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Connection to Unmet Needs

As required by the 87 FR 6364 and 87 FR 31636, TNECD will allocate at least 80 percent of the funds to address unmet needs with HUD-identified “most impacted and distressed” areas. The remaining 20 percent of the allocation may be used to address unmet needs that received a 2020 or 2021 presidential major disaster declaration as part of FEMA disaster numbers 4476, 4541, and 4609.

Based on the publicly available FEMA data, and initial meetings and conversations with state and local government officials, the largest unmet needs fall into three primary categories: housing, infrastructure, and economic development. For affected areas under disasters 4476 and 4541, the unmet needs are almost exclusively related to housing that was lost and damaged and infrastructure that was damaged, including remaining debris cleanup. Affected areas under disaster 4609 has these same needs with the addition of business assistance. The Consolidated Notice allows a Grantee to provide a justification for disproportionate allocation of funds to address demonstrated unmet needs in the Action Plan. Delays in receiving data has made it a challenge to determine the unmet needs with precision. In light of this challenge, TNECD engaged with disaster impacted communities and received feedback that affordable rental housing and infrastructure and facilities are included in recovery needs that TNECD can focus on. Homeowners have been receiving assistance through long-term recovery groups as well as having insurance and/or the impacted homes are second homes. Whereas renters are more vulnerable, have more barriers to safe, stable and affordable housing, and the vacancy rate is higher.

As recognized in this action plan, the amount of unmet need related to economic development is anticipated to be lower in 2023 than when the data was collected by SBA. Because of the lower anticipated unmet need for economic development and recognized unmet need that exist for housing and infrastructure, TNECD has decided to allocate the funding and its resources primarily to housing and infrastructure activities that will address unmet needs.

At least 70 percent of all program funds will benefit LMI persons or households. As individual activities are developed and funded, the state and subrecipient local government will do so with the LMI benefit requirement in mind. All housing activities will be designed to benefit LMI persons and historically distressed/disadvantaged individuals. The majority of infrastructure and mitigation activities are intended to be designed to principally benefit LMI populations and historically distressed/disadvantaged individuals.

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Infrastructure Unmet Need

Disaster Damage and Impacts

Table 38: FEMA Public Assistance Program

DR-4476				
PA Category	# Damaged Sites	Sum of Approx. Cost	Sum of Federal Share	Sum of Non-Federal Share
A – Debris Removal	14	\$13,638,330.58	\$12,274,497.53	\$1,363,833.05
B – Protective Measures	24	\$9,553,580.49	\$8,584,437.73	\$969,142.76
C – Roads and Bridges	2	\$83,693.68	\$75,324.31	\$8,369.37
D - Water Control Facilities	0	\$0.00	\$0.00	\$0.00
E – Public Buildings	9	\$5,025,320.06	\$4,522,788.05	\$502,532.01
F – Public Utilities	9	\$980,261.41	\$882,235.28	\$98,026.13
G – Recreational or Other	2	\$1,844,473.28	\$1,660,025.95	\$184,447.33
Z – State Management	15	\$890,053.34	\$890,053.34	\$0.00

Source: FEMA PA

DR-4541				
PA Category	# Damaged Sites	Sum of Approx. Cost	Sum of Federal Share	Sum of Non-Federal Share
A – Debris Removal	13	\$16,093,999.89	\$14,484,599.90	\$1,609,399.99
B – Protective Measures	10	\$4,244,341.46	\$3,819,907.32	\$424,434.14
C – Roads and Bridges	17	\$1,228,641.18	\$1,105,777.07	\$122,864.11
D - Water Control Facilities	0	\$0.00	\$0.00	\$0.00
E – Public Buildings	5	\$601,565.63	\$541,409.07	\$60,156.56
F – Public Utilities	7	\$36,205,665.82	\$32,585,099.25	\$3,620,566.57
G – Recreational or Other	5	\$216,952.78	\$195,257.50	\$21,695.28
Z – State Management	9	\$633,606.22	\$633,606.22	\$0.00

Source: FEMA PA

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DR-4609				
PA Category	# Damaged Sites	Sum of Approx. Cost	Sum of Federal Share	Sum of Non-Federal Share
A – Debris Removal	10	\$3,424,877.60	\$3,082,389.84	\$342,487.76
B – Protective Measures	10	\$12,728,151.07	\$11,455,335.96	\$1,272,815.11
C – Roads and Bridges	48	\$10,684,459.18	\$9,616,013.28	\$1,068,445.90
D - Water Control Facilities	1	\$8,450.00	\$7,605.00	\$845.00
E – Public Buildings	7	\$1,805,023.84	\$1,624,521.46	\$180,502.38
F – Public Utilities	7	\$2,039,903.24	\$1,835,912.92	\$203,990.32
G – Recreational or Other	4	\$349,475.99	\$314,528.39	\$34,947.60
Z – State Management	7	\$41,498.03	\$41,498.03	\$0.00

Source: FEMA PA

Leveraging Funds

At this time, direct leverage of funding for activities funding with this grant is unknown, but not unexpected. As activities are developed, available and eligible sources of funding will be identified and applied. However, other sources of funding are known to be contributing to the recovery of the qualifying jurisdictions under this grant.

Program Partners

The full slate of program partners is still unknown and will be identified as the programs and activities are developed. Preliminary planning meetings have been held in the impacted areas with county mayors and other elected officials, local utilities directors, local emergency management directors, public housing authority staff, and other members from each community.

At this time known partners are local governments in the HUD and state- identified MID-areas, the Tennessee Emergency Management Agency (TEMA), the Tennessee Department of Environment and Conservation (TDEC), and the West Tennessee River Basin Authority (WTRBA). Anticipated partners include the Tennessee Department of Transportation (TDOT), the US Army Corps of Engineers (USACE), the Nature Conservancy, the Tennessee Housing Development Agency, institutions of higher education, and non-profit organizations.

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Technical Assistance to Subrecipients

TNECD has a long, well-established, and highly successful history of providing its subrecipients with technical assistance in all aspects of program compliance. At the very beginning of program implementation, Program Managers meet with potential subrecipients to review all aspects of the requirements of each program. Once subrecipient agreements have been executed, TNECD provides specific training on all compliance measures and program objectives, including CDBG-DR specific regulations; financial controls measures; environmental regulations and review requirements; FHEO regulations and program specific measures; eligibility criteria; duplication of benefits review requirements; contractor procurement under state and federal law and management of those contractors; construction case management; record management requirements; National Objective documentation; invoicing, the Cash Request process, and payment management requirements; financial, programmatic, and compliance monitoring; external auditing; public participation and program access matters; and Disaster Recovery Grant Reporting (DRGR). Throughout the life of the subrecipient agreements, TNECD will provide technical assistance to its subrecipients, through the monitoring process which not only uncovers potential or actual problems with a subrecipient's handling of a project but also to provides technical assistance to guide a successful resolution of that matter before it becomes a major problem.

Distribution of Funds

The method of distribution for these grant funds will be different from methods of distribution under previous disaster allocations. TNECD will not hold an open application round, but instead, it will work directly with HUD and state identified counties and local governments to develop activities that address unmet recovery needs. Funding will be allocated to these local governments using a subrecipient model. This method is intended to be more collaborative and more efficient with the use of funds, recognizing the local governments understand their needs better and have stronger relationships with other local partners. TNECD does not intend to undertake any activities directly. In total HUD identified three zip codes as areas of most impact and distress (MID) under the 2020 qualifying disasters; one each in Davidson, Hamilton, and Putnam counties. The state was allowed to expand these MID areas from these zip codes to greater county. Under the 2021 disaster only Humphreys County was designated by HUD as a MID area. The CDBG-DR program requires that at least 80% of the total funding (including administration costs) be used for activities benefitting HUD-MID areas, but grantees may use the remaining 20% to fund to provide more funding for HUD-MID areas or identify additional MID areas that are included in the declared disaster. Based on the publicly available FEMA and SBA data, TNECD is also including Bradley County and Wilson County under the 2020 disasters and Dickson County, Hickman County and Houston County under the 2021 disaster.

These counties were identified by reviewing the total amount of FEMA Public Assistance and Individual Assistance and the total amount of SBA loans approved for businesses and homes and comparing those totals against the total amounts of damage and loss identified. Wilson County, Bradley County, clearly stood out when looking and the gap between damages/loss and funding provided in terms of dollar amount and percentage for the 2020 disasters. For the 2021 disaster, the flooding was extensive, and impacted all four counties in the declaration to various degrees. Additionally, these counties are all contiguous and share watershed boundaries.

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For each disaster year, the following are the required amounts that must be allocated to the HUD-identified MID areas:

2020 Disasters: \$34,192,000 (including administration costs)

2021 Disaster: \$33,604,000 (including administration costs)

Initially funds will be allocated accordingly, but may be adjusted as more information is received and activities are developed:

2020 Disasters

Davidson County:	\$10,827,467
Hamilton County:	\$10,827,466
Putnam County:	\$10,827,466
Bradley County:	\$2,120,600
Wilson County:	\$6,000,000
State Administration:	\$2,137,000

2021 Disaster

Humphreys County:	\$34,000,000
Dickson County:	\$3,000,000
Hickman County:	\$1,904,750
Houston County:	\$1,000,000
State Administration:	\$2,100,250

Additionally, 15% of each overall grant must go toward mitigation activities. For the 2020 disasters, this means that \$5,575,000 must go toward activities that include mitigation actions. For the 2021 disaster, the mitigation amount is \$5,500,000. These are at or above the minimum mitigation amounts specified in the Federal Register notices. We also anticipate that some recovery activities will include mitigation actions as part of the design. This amount may be adjusted as activities are developed if more funding is needed for standalone mitigation activities.

Preliminarily the maximum grant amount that will be associated with any one activity under the corresponding programs are outlined in the Program Budget section of the Action Plan. As activities are more fully developed, these amounts may be increased to accommodate.

Eligible Activity

42 USC 5305(a)(4) authorizes the clearance, demolition, removal, reconstruction, and rehabilitation (including rehabilitation which promotes energy efficiency) of buildings and improvements (including interim assistance, and financing public or private acquisition for reconstruction or rehabilitation, and reconstruction or rehabilitation, of privately-owned properties, and including the renovation of closed school buildings). The eligibility of housing projects is further established in the Consolidated Notice, 87 FR 31636, which requires TNECD to address unmet housing recovery needs with CDBG-DR funds. New housing construction is also eligible as established in the Consolidated Notice, 87 FR 31636. Through 87 FR 31636, HUD adopts alternative requirements to activities eligible under HCDA Section 105(a) which allows TNECD to carry out modified activities to comply with the requirements in the Federal Register Notice to incorporate mitigation measures as a construction standard.

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National Objective

In accordance with 24 CFR 570.208, all CDBG-DR funded activities must satisfy a national objective. For the Affordable Housing Development Fund program, all projects will meet the low to moderate income housing national objective. While proposed projects may be mixed income, CDBG-DR funds will only be applied to the affordable units restricted for occupancy by low-to-moderate-income households.

As established by 87 FR 31636, at least 70 percent of all program funds will benefit LMI persons or households. However, as outlined in this Action Plan, TNECD intends for the full allocation to benefit LMI persons or households. Details on how each funded activity proposes to meet such requirement can be found in the description of each planned activity. At minimum, each funded program or activity is aimed to be a direct response to an unmet need identified in the Action Plan's unmet needs assessment. The CDBG eligible activity is presented must also adhere to HUD's National Objective criteria, which may include the following:

- LMA (Low/mod area benefit). Activities providing benefits that are available to all the residents of a particular area, at least 51 percent of whom are low- and moderate- income. The service area of an LMA activity is identified by the local jurisdiction and approved by TNECD.
- LMC (Low/mod limited clientele). Activities which benefit specific groups of low- and moderate- income individuals. LMC activities provide benefits to a specific group of persons rather than to all residents of a particular area.
- LMH (Low/Mod housing benefit). Activities undertaken which improve or provide permanent residential structures that will be occupied by low/mod income households.
- UN (Urgent Need). Urgent Need projects include projects which pose a serious and immediate threat to the health or welfare of the community, are of recent origin or recently became urgent, and are unable to be otherwise financed.

This Action Plan does not modify any Federal standards or other legal requirements. Any effort by TNECD or its agents to modify such standards or other legal requirements must be preceded by the ordinary procedures to request a waiver from the appropriate Federal authority.

Program Income

TNECD does not anticipate the funded activities for either the 2020 or 2021 CDBG-DR grants to generate program income. In the event program income is generated through the sale or disposition of assets funded in whole or in part with CDBG-DR funding, the subrecipient must notify TNECD immediately. TNECD will then consult with the subrecipient to determine if other activities that meet the requirements and criteria of the CDBG-DR program are viable. If no activities are identified the subrecipient will return the program income to TNECD. TNECD will then determine if potential activities exist in other qualifying counties that meet the necessary requirements and criteria of the program. If no activities are identified in qualifying counties, TNECD will transfer the funds to the annual CDBG program. If the subrecipient that generates the program income is

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an Entitlement grantee under the annual formula allocation, the subrecipient may request to retain and transfer the funds to its own annual program.

Resale or Recapture

For qualifying programs, TNECD will work closely with THDA to develop resale and recapture requirements that are modeled on and consistent with the resale and recapture requirements and provisions within the established HOME program.

6. Appendix A

Certifications

- a. The grantee certifies that it has in effect and is following a residential anti-displacement and relocation assistance plan (RARAP) in connection with any activity assisted with CDBG–DR grant funds that fulfills the requirements of Section 104(d), 24 CFR part 42, and 24 CFR part 570, as amended by waivers and alternative requirements.
- b. The grantee certifies its compliance with restrictions on lobbying required by 24 CFR part 87, together with disclosure forms, if required by part 87.
- c. The grantee certifies that the action plan for disaster recovery is authorized under state and local law (as applicable) and that the grantee, and any entity or entities designated by the grantee, and any contractor, subrecipient, or designated public agency carrying out an activity with CDBG–DR funds, possess(es) the legal authority to carry out the program for which it is seeking funding, in accordance with applicable HUD regulations as modified by waivers and alternative requirements.
- d. The grantee certifies that activities to be undertaken with CDBG–DR funds are consistent with its action plan.
- e. The grantee certifies that it will comply with the acquisition and relocation requirements of the URA, as amended, and implementing regulations at 49 CFR part 24, as such requirements may be modified by waivers or alternative requirements.
- f. The grantee certifies that it will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR part 75.
- g. The grantee certifies that it is following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.115 or 91.105 (except as provided for in waivers and alternative requirements). Also, each local government receiving assistance from a state grantee must follow a detailed citizen participation plan that satisfies the requirements of 24 CFR 570.486 (except as provided for in waivers and alternative requirements).
- h. State grantee certifies that it has consulted with all disaster-affected local governments (including any CDBG entitlement grantees), Indian tribes, and any local public housing authorities in determining the use of funds, including the method of distribution of funding, or activities carried out directly by the state.
- i. The grantee certifies that it is complying with each of the following criteria:
 1. Funds will be used solely for necessary expenses related to disaster relief, long-term recovery, restoration of infrastructure and housing, economic revitalization, and mitigation in the most impacted and distressed areas for which the President declared a major disaster pursuant to the Robert T. Stafford Disaster Relief and Emergency Assistance Act of 1974 (42 U.S.C. 5121 et seq.).
 2. With respect to activities expected to be assisted with CDBG–DR funds, the action plan has been developed so as to give the maximum feasible priority to activities that will benefit low- and moderate-income families.
 3. The aggregate use of CDBG–DR funds shall principally benefit low- and moderate-income families in a manner that ensures that at least 70 percent (or another

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percentage permitted by HUD in a waiver) of the grant amount is expended for activities that benefit such persons.

4. The grantee will not attempt to recover any capital costs of public improvements assisted with CDBG–DR grant funds, by assessing any amount against properties owned and occupied by persons of low- and moderate-income, including any fee charged or assessment made as a condition of obtaining access to such public improvements, unless:
 - a. Disaster recovery grant funds are used to pay the proportion of such fee or assessment that relates to the capital costs of such public improvements that are financed from revenue sources other than under this title; or
 - b. for purposes of assessing any amount against properties owned and occupied by persons of moderate income, the grantee certifies to the Secretary that it lacks sufficient CDBG funds (in any form) to comply with the requirements of clause (a).
- j. State and local government grantees certify that the grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), the Fair Housing Act (42 U.S.C. 3601–3619), and implementing regulations, and that it will affirmatively further fair housing. An Indian tribe grantee certifies that the grant will be conducted and administered in conformity with the Indian Civil Rights Act.
- k. The grantee certifies that it has adopted and is enforcing the following policies, and, in addition, state grantees must certify that they will require local governments that receive their grant funds to certify that they have adopted and are enforcing: (1) A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in nonviolent civil rights demonstrations; and (2) A policy of enforcing applicable state and local laws against physically barring entrance to or exit from a facility or location that is the subject of such nonviolent civil rights demonstrations within its jurisdiction.
- l. The grantee certifies that it (and any subrecipient or administering entity) currently has or will develop and maintain the capacity to carry out disaster recovery activities in a timely manner and that the grantee has reviewed the requirements applicable to the use of grant funds.
- m. The grantee certifies to the accuracy of its Financial Management and Grant Compliance Certification Requirements, or other recent certification submission, if approved by HUD, and related supporting documentation as provided in section III.A.1. of the Consolidated Notice and the grantee’s implementation plan and related submissions to HUD as provided in section III.A.2. of the Consolidated Notice.
- n. The grantee certifies that it will not use CDBG–DR funds for any activity in an area identified as flood prone for land use or hazard mitigation planning purposes by the state, local, or tribal government or delineated as a Special Flood Hazard Area (or 100-year floodplain) in FEMA’s most current flood advisory maps, unless it also ensures that the action is designed or modified to minimize harm to or within the floodplain, in accordance with Executive Order 11988 and 24 CFR part 55. The relevant data source for this provision is the state, local, and tribal government land use regulations and hazard mitigation plans and the latest-issued FEMA data or guidance, which includes advisory data (such as Advisory Base Flood Elevations) or preliminary and final Flood Insurance Rate Maps.

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- o. The grantee certifies that its activities concerning lead-based paint will comply with the requirements of 24 CFR part 35, subparts A, B, J, K, and R.
- p. The grantee certifies that it will comply with environmental requirements at 24 CFR part 58.
- q. The grantee certifies that it will comply with the provisions of title I of the HCDA and with other applicable laws.

Warning: Any person who knowingly makes a false claim or statement to HUD may be subject to civil or criminal penalties under 18 U.S.C. 287, 1001, and 31 U.S.C. 3729.

Waivers – Overall Benefit for Low – and Moderate – Income Persons

According to 87 FR 31636 a grantee may seek to reduce the overall benefit requirement below 70 percent of the total grant. At this time TNECD has not formally requested a waiver to reduce the overall benefit requirement below 70 percent. The goal is to meet this requirement, but as activities are developed, specifically under infrastructure and mitigation programs, the need may arise to make a request to reduce the overall LMI benefit to carryout meaningful activities.

Summary and Response of Public Comments

This section is a placeholder for the public comments to be received from the public hearing.

The following provides a summary of public comments received for the *CDBG- Disaster Recovery Action Plan* in response to *Disaster* during the public comment period of *Month, Day, Year* through *Month, Day, Year*. *Grantee* received a total of X number of comments during the 30 calendar days. *Attachment of full public comment*

Data Sources/Methodologies

Owner Occupied Households:

- Minor-Low:
 - Less than \$3,000 of FEMA inspected real property damage
- Minor-High:
 - \$3,000 to \$7,999 of FEMA inspected real property damage
- Major-Low:
 - \$8,000 to \$14,999 of FEMA inspected real property damage
- Major-High:
 - \$15,000 to \$28,800 of FEMA inspected real property damage
- Severe:
 - Greater than \$28,800 of FEMA inspected real property damage

Renter Occupied Households:

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- Minor-Low:
 - Less than \$1,000 of FEMA inspected personal property damage
- Minor-High:
 - \$1,000 to \$1,999 of FEMA inspected personal property damage
- Major-Low:
 - \$3,500 to \$4,999 of FEMA inspected personal property damage
- Major-High:
 - \$5,000 to \$8,999 of FEMA inspected personal property damage
- Severe:
 - Greater than \$9,000 of FEMA inspected personal property damage

Important Definitions and Terms

AMI: Area Median Income

CBDO: Community Based Development Organization

CDBG: Community Development Block Grant

CDBG-DR: Community Development Block Grant- Disaster Recovery

CFR: Code of Federal Regulations

CO: Certifying Officer

CP: Participation

DOB: Duplication of Benefits

DRGR: Disaster Recovery and Grant Reporting System

FEMA: Federal Emergency Management Agency

HCD Act: Housing and Community Development Act of 1974, as amended

HMGP: Hazard Mitigation Grant Program

IA: (FEMA) Individual Assistance

LIHTC: Low-Income Housing Tax Credit

LMI: Low and moderate-income

NFIP: National Flood Insurance Program

PA: (FEMA) Public Assistance

RE: Responsible Entity

RFP: Request for Proposals

SBA: U.S. Small Business Administration

SFHA: Special Flood Hazard Area

UGLG: Unit of general local government

URA: Uniform Relocation Assistance and Real Property Acquisition Act of 1970, as amended

USACE: U.S. Army Corps of Engineers

Standard Form 424

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Federally Protected Classes

Table 106: Overall Social Vulnerability Index, Percentile Ranking

DR-4476	
County	SVI Percentile Ranking
Davidson	74%
Putnam	56%
Wilson	2%

Source: CDC/ATSDR Social Vulnerability Index

DR-4541	
County	SVI Percentile Ranking
Bradley	77%
Hamilton	44%

Source: CDC/ATSDR Social Vulnerability Index

DR-4609	
County	SVI Percentile Ranking
Dickson	16%
Hickman	14%
Houston	36%
Humphreys	13%

Source: CDC/ATSDR Social Vulnerability Index

Table 117: Persons with Disabilities

DR-4476 – Davidson County		
Disability	Population with Disability	(%) Population with Disability
With a hearing difficulty	19,681	2.8%
With a vision difficulty	17,321	2.5%
With a cognitive difficulty	31,035	4.7%
With an ambulatory difficulty	38,481	5.9%
With a self-care difficulty	14,269	2.2%
With an independent living difficulty	25,033	4.5%
Total	78,660	11.2%

Source: U.S. Census Bureau, 2021 American Community Survey 5-Year Estimates

DR-4476 – Putnam County		
Disability	Population with Disability	(%) Population with Disability
With a hearing difficulty	3,369	4.3%
With a vision difficulty	1,923	2.5%
With a cognitive difficulty	4,526	6.2%
With an ambulatory difficulty	5,647	7.7%
With a self-care difficulty	1,620	2.2%
With an independent living difficulty	3,593	5.8%
Total	11,354	14.6%

Source: U.S. Census Bureau, 2021 American Community Survey 5-Year Estimates

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DR-4476 – Wilson County		
Disability	Population with Disability	(%) Population with Disability
With a hearing difficulty	5,940	4.1%
With a vision difficulty	3,688	2.6%
With a cognitive difficulty	6,898	5.1%
With an ambulatory difficulty	7,928	5.9%
With a self-care difficulty	2,963	2.2%
With an independent living difficulty	5,668	5.2%
Total	18,219	12.7%

Source: U.S. Census Bureau, 2021 American Community Survey 5-Year Estimates

DR-4541 – Bradley County		
Disability	Population with Disability	(%) Population with Disability
With a hearing difficulty	5,272	4.7%
With a vision difficulty	3,812	3.6%
With a cognitive difficulty	8,173	8.1%
With an ambulatory difficulty	10,448	10.4%
With a self-care difficulty	3,871	3.8%
With an independent living difficulty	7,287	8.8%
Total	19,644	19.0%

Source: U.S. Census Bureau, 2021 American Community Survey 5-Year Estimates

DR-4541 – Hamilton County		
Disability	Population with Disability	(%) Population with Disability
With a hearing difficulty	14,129	3.9%
With a vision difficulty	9,043	2.5%
With a cognitive difficulty	20,978	6.2%
With an ambulatory difficulty	29,088	8.6%
With a self-care difficulty	10,326	3.0%
With an independent living difficulty	19,471	6.9%
Total	52,774	14.7%

Source: U.S. Census Bureau, 2021 American Community Survey 5-Year Estimates

DR-4609 – Dickson County		
Disability	Population with Disability	(%) Population with Disability
With a hearing difficulty	3,342	6.2%
With a vision difficulty	1,929	3.6%
With a cognitive difficulty	3,944	7.8%
With an ambulatory difficulty	4,688	9.3%
With a self-care difficulty	1,862	3.7%
With an independent living difficulty	3,152	7.6%
Total	9,542	17.8%

Source: U.S. Census Bureau, 2021 American Community Survey 5-Year Estimates

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DR-4609 – Hickman County		
Disability	Population with Disability	(%) Population with Disability
With a hearing difficulty	1,435	6.2%
With a vision difficulty	1,096	4.7%
With a cognitive difficulty	1,236	5.7%
With an ambulatory difficulty	2,376	10.9%
With a self-care difficulty	765	3.5%
With an independent living difficulty	1,155	6.4%
Total	4,228	18.3%

Source: U.S. Census Bureau, 2021 American Community Survey 5-Year Estimates

DR-4609 – Houston County		
Disability	Population with Disability	(%) Population with Disability
With a hearing difficulty	414	5.1%
With a vision difficulty	314	3.9%
With a cognitive difficulty	571	7.5%
With an ambulatory difficulty	618	8.1%
With a self-care difficulty	234	3.1%
With an independent living difficulty	479	7.7%
Total	1,385	17.2%

Source: U.S. Census Bureau, 2021 American Community Survey 5-Year Estimates

DR-4609 – Humphreys County		
Disability	Population with Disability	(%) Population with Disability
With a hearing difficulty	1,018	5.5%
With a vision difficulty	499	2.7%
With a cognitive difficulty	1,010	5.7%
With an ambulatory difficulty	1,975	11.2%
With a self-care difficulty	680	3.8%
With an independent living difficulty	1,401	9.6%
Total	3,270	17.5%

Source: U.S. Census Bureau, 2021 American Community Survey 5-Year Estimates

Appendix C

Public Action Plan

Consider adding Public Hearing section within the Citizen Participation section that details any accommodations available at the public hearing. Note any other actions taken during the public hearing to increase accessibility (virtual or in-person, recorded session, presentation materials posted, etc.).