



2015 - 2019

State of Texas Consolidated Plan



TEXAS DEPARTMENT OF
HOUSING & COMMUNITY AFFAIRS

Building Homes. Strengthening Communities.



AD-25 Administration of the Consolidated Plan

Strategic Plan Beginning Year:* 2015
Ending Year:* 2019
Title:* State of Texas Consolidated Plan
Plan Version:* 1
If Amendment: N/A

Programs included:*
CDBG
HOME
ESG
HOPWA

Consolidated Plan is for*: Grantee

Public Housing Agencies

Code	Agency Name
TX901	Texas Department of Housing & Community Affairs

AD-50 Verify Grantee/PJ Information in IDIS

Grantee Information

Lead Agency: Texas
Year: 2015
Start Date: 02/01/2015
End Date: 01/31/2019

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AD-55 Verify Grantee/PJ Program Contacts

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Executive Summary

ES-05 Executive Summary - 91.300(c), 91.320(b)

1. Introduction

The 2015–2019 State of Texas Consolidated Plan (“Plan”) governs four programs funded by the U.S. Department of Housing and Urban Development (“HUD”): the Community Development Block Grant Program (“CDBG”), the HOME Investment Partnerships (“HOME”) Program, the Emergency Solutions Grants (“ESG”) Program, and the Housing Opportunities for Persons with AIDS (“HOPWA”) Program. If 2014 HUD funding levels remain consistent, the Plan will govern approximately \$97,000,000 annually. This Plan determines which of HUD’s eligible activities have been identified to best serve the needs of Texas.

HUD allows a broad range of activities for CDBG, HOME, ESG, and HOPWA. CDBG provides resources for community development, which may include acquisition of real property; relocation and demolition; rehabilitation of residential and non-residential structures; construction of public facilities and improvements; public services; activities relating to energy conservation and renewable energy resources; and provision of assistance to profit-motivated businesses to carry out economic development and job creation/retention activities. HOME is used for single-family and multifamily housing activities, which may include providing home purchase or rehabilitation financing assistance to eligible homeowners and new homebuyers; building or rehabilitating housing for rent or ownership for eligible households; and tenant-based rental assistance to subsidize rent for low-income persons. ESG funds projects which may include supportive services to homeless individuals and households, emergency shelter/transitional housing, homelessness prevention assistance, and permanent housing for the homeless population. HOPWA is dedicated to the housing and supportive service needs of people living with HIV/AIDS and their families, which may include the acquisition, rehabilitation, or new construction of housing units; facility operations; rental assistance; short-term payments to prevent homelessness; case management; substance abuse treatment; mental health treatment; nutritional services; job training and placement assistance; and assistance with daily living.

The Texas Department of Housing and Community Affairs (“TDHCA”) administers the HOME Program and ESG Program; the Texas Department of Agriculture (“TDA”) administers the CDBG Program; and the Texas Department of State Health Services (“DSHS”) administers the HOPWA Program. All three State agencies collaborated to complete the Plan, along with extensive input from other state agencies, stakeholders, advocates, and community members. TDHCA is the lead agency for the Plan’s development.

The Plan consists of five main chapters. The first main chapter is the Process Chapter, which describes the public input process. The second chapter is the Needs Assessment, which outlines levels of relative need in the areas of affordable housing, homelessness, special needs populations, and community development. Information was gathered through consultation with local agencies, public outreach, and demographic and economic datasets. The third chapter, Market Analysis, focuses on economic forces, as

well as the current condition and availability of housing and community development resources. The research-heavy Needs Assessment and Market Analysis chapters form the basis of the fourth chapter, the Strategic Plan, which details how the State will address its priority needs over a five-year period. The strategies reflect the condition of the market, expected availability of funds, and local capacity to administer the Plan. The Strategic Plan is used as a basis for the final chapter: the One Year Action Plan, which will be updated annually.

2. Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview

The Needs Assessment Chapter shapes the policies throughout the Plan. The most common housing problem was moderate to severe cost burden, especially for households with incomes between 0-30% of the area median income ("AMI"). In most cases renters experienced a higher rate of housing problems than homeowners. When comparing the Needs Assessment Chapter to the Market Analysis Chapter, the shortage of affordable housing becomes apparent. However, the State recognizes that housing costs are impacted by local economies, and common housing problems may vary by neighborhood. The Strategic Plan identifies Priority Needs for housing, such as rental assistance; production of new units; acquisition of existing units; and rehabilitation of housing.

The Needs Assessment finds that people with special needs have specific barriers to housing. For example, people with disabilities typically have lower incomes than other household types and require housing with certain specifications, such as physical accessibility features. Special needs populations include elderly and frail elderly; homeless populations and persons at risk of homelessness; persons living with HIV/AIDS and their families; persons with alcohol and substance use disorders; persons with disabilities (mental, physical, intellectual, developmental); public housing residents; residents of colonias; and victims of domestic violence. While not specifically designated as "special needs," the State is directed statutorily to gather data on farmworkers, youth aging out of foster care, and veterans. Each of these special needs populations are specifically focused on through incentives within at least one of the HUD programs covered by this Plan.

ESG focuses on persons who are homeless or at risk of homelessness. Therefore the Needs Assessment has one section dedicated to this population, including numbers of households experiencing sheltered and unsheltered homelessness, and a discussion on the greater likelihood that minorities are homeless. The Market Analysis lists the available resources for homeless populations, and the Strategic Plan identifies Priority Needs as homeless outreach; emergency shelter and transitional housing; rapid re-housing; and homelessness prevention.

HOPWA focuses on persons living with HIV/AIDS and their families, so the Needs Assessment includes an in-depth discussion about this population. Racial and ethnic minorities are disproportionately affected by HIV. Also, persons with HIV are more vulnerable to becoming homeless. The Strategic Plan identifies priority needs to serve persons with HIV/AIDS, such as rental assistance; supportive services for persons with HIV/AIDS; rapid re-housing; and homelessness prevention.

Needs Assessment Section 15 shows disproportionate housing problems based on race, which is defined as a 10% difference compared to the State as a whole. Colonias, which are residential areas along the Texas-Mexico border that lack basic living necessities, such as potable water, electricity, paved roads, and safe and sanitary housing, showed very high rates of housing problems. The *2013 Analysis of Impediments to Fair Housing Choice* identified local best practices that mitigate barriers and promote choice for housing. The Strategic Plan and Action Plan lay out steps, such as research on affordable housing expansion, which mitigate the negative effects of public policies on affordable housing.

Finally, non-housing community needs focus on economic and community development. The Needs Assessment finds a large demand for community infrastructure, including water and wastewater systems, roads/ streets, and utilities. Also, there is great emphasis to serve colonias with these types of services. The Strategic Plan identifies priority community development needs as public improvements and infrastructure; economic development; public facilities; and public services.

3. Evaluation of past performance

The information below is for HOME, ESG, CDBG, and HOPWA for Program Year ("PY") 2013 (February 1, 2013 to January 31, 2014).

During PY 2013, the Texas CDBG Program committed a total of \$75,871,400 through 254 awarded contracts. For contracts that were awarded in PY 2013, 414,973 persons were anticipated to receive service. The Colonia Self Help Centers awarded \$1,564,167 in contracts outside the PY2013 reported below. Distribution of the funds by activity is described in the table below.

In PY 2013, DSHS' HOPWA served 441 households with TBRA (109% of the One Year Action Plan, or "OYAP" goal), 470 households with Short-Term Rent and Mortgage and Utility ("STRMU") assistance (86% of the OYAP goal), and 12 households with Permanent Housing Placement ("PHP") assistance (80% of the OYAP goal) for a total of 923 unduplicated households. Of the total households served, 907 also received HOPWA-funded Supportive Services (95% of the OYAP goal). All HOPWA clients receive housing supportive services at some level, but some costs were leveraged with other funding sources. Client outcome goals for housing stability, reducing homelessness risk, and improving access to care were also achieved. (Subtotalled and/or totaled dollar amounts may not be exact due to all expenses are reported to two decimal points but are rounded to nearest whole dollar for the HOPWA chart.)

ESG is expended by Federal Fiscal Year (10/1-9/30). TDHCA evaluated ESG funds committed versus funds expended by activity for PY 2013, a time period that consists of half of Federal Fiscal Year 2012 (2/1/2013-9/30/2013) and Federal Fiscal Year 2013 (10/1/2013-1/31/2014). Based on TDHCA's ESG analysis, expenditures were well within range of state funding for activities. The largest disparities were found in Homelessness Prevention, where the State committed 23% of the overall budget and the activity accounted for 26% of expenditures, and in Rapid Re-Housing, where the State committed 32% of the total budget and the activity accounted for 30% of expenditures. The evaluation indicated that the State needed to minimally change its goals or projects.

TDHCA's HOME program committed \$45,747,623 through seven HOME Program activities in PY 2013, representing assistance to 1,133 households. Details on the amount committed in each activity type are included in the chart below.

Fund	2013 Total Obligation
Community Development Fund	\$42,879,742
Texas Capital Fund	\$14,873,609
Colonia Construction Fund	\$5,500,000
Colonia Economically Distressed Areas Program Fund	\$619,665
Colonia Planning Fund	\$24,250
Colonia Self-Help Centers	\$0*
Planning / Capacity Building	\$560,495
Disaster Relief/ Urgent Need	\$9,407,233
STEP Fund	\$2,006,406
Total	\$75,871,400
	*The Colonia Self Help Centers awarded \$1,564,167 in PY2012.

Table 1 - CDBG Funds Committed, PY 2013

Activity	Amount
Expenditures for Housing Information Services	\$0
Expenditures for Resource Identification	\$0
Expenditures for Housing Assistance (equals the sum of all sites and scattered-site Housing Assistance)	\$2,285,384
Expenditures for Supportive Services	\$469,448
Grantee Administrative Costs expended	\$25,375
Project Sponsor(s) Administrative Costs expended	\$176,971
Total of HOPWA funds expended during period	\$2,957,179

Table 2 - HOPWA Program Expenditures, PY 2013

Activity	Total Funds Expended*	Percentage
Street Outreach	\$502,953.00	6%
Emergency Shelter	\$2,875,237.00	30%
Homelessness Prevention	\$2,505,265.00	26%
Rapid Re-Housing	\$2,877,496.00	30%
Homeless Management Information Systems	\$486,570.00	5%
Administration	\$308,974.00	3%
Total	\$9,556,495.00	100%
	*Expenditures include funds from PY 2011 Second Allocation and PY 2012.	

Table 3 - ESG Fund Expenditures by Activity (02/01/2013-01/31/2014)

Activity	Total Committed
Homebuyer Assistance (all activities)	\$4,144,295.52
Homeowner Rehabilitation	\$19,299,152.13
Tenant-Based Rental Assistance	\$5,072,945
CHDO Rental Development	\$3,000,000
CHDO Single Family Development	\$434,477
CHDO Operating Expenses	\$50,000
Rental Housing Development	\$13,746,754
Total	\$45,747,623.65

Table 4 - HOME Commitments by Activity, PY 2013

4. Summary of citizen participation process and consultation process

The State is committed to collaboration with a diverse cross-section of the public in order to meet the various affordable housing needs of Texans. The State also collaborates with governmental bodies, nonprofits, and community and faith-based groups.

Prior to the release of the Draft Plan, several consultations were completed statewide, between April, 2014, and September, 2014, by TDHCA, DSHS, and TDA. The State conducted consultations in person, workshops, roundtables, planning meetings, and a public hearing. The State also conducted consultations electronically, using an online discussion forum, an online survey, listserv announcements, and emails.

During the consultation process, the State consulted with a wide variety of public, private, and nonprofit agencies that provide services including assisted housing, health services, and social and fair housing services, including those focusing on services to children, elderly persons, persons with disabilities, persons with HIV/AIDS and their families, homeless persons, and colonia residents.

Following the release of the Draft 2015-2019 Plan, a 32-day public comment period was open from September 12, 2014, through October 13, 2014. Four public hearings were held across the State at the following dates and times:

- September 30, 2014, San Antonio, 6:00pm
- October 2, 2014, Harlingen, 11:00am
- October 6, 2014, Austin, 5:00pm
- October 8, 2014, Fort Worth, 12:30pm

Two of the hearings were held after business hours. Six people commented at the hearings. Staff members received 28 email comments and 12 letter comments. Some of these commenters submitted oral and written comments and several of the letters represented comments of more than one person.

5. Summary of public comments

The initial public comment on the development of the draft Plan focused on the HOME and CDBG programs. Summary of those comments and staff's reasoned responses are in AD-25. For the comments that occurred during the consultation, the descriptions are in Process Chapter Section 10. Because HUD's online template for grantees, Integrated Disbursement & Information System ("IDIS") had technical difficulties and provided data limitations in saving and responding to all of the consultations, a list of consultations is also attached in the Attachments Chapter.

The public comment on the draft Plan resulted in several clarifications and additional information included in the Plan. Every program received public comment. Public comments about the programs centered on funding goal percentages for each activity, scoring criteria for award-making, and distribution process of awards. Several commenters spoke or gave written testimony on behalf of special needs groups, such as homeless populations, victims of domestic violence, people with disabilities, and farmworkers. Additionally, a few of the comments asked for clarification on the data provided or the addition of national or local statistics or information in the Plan's Needs Assessment and Market Analysis Chapters. The summary of the 67 total comments and the staff responses is attached in the Attachments Chapter.

6. Summary of comments or views not accepted and the reasons for not accepting them

Because of the flexible nature of a draft Plan, all comments were considered for revisions. Comments or views that were not accepted were typically comments or views that requested that one activity be eliminated in favor of another activity, or that a specific activity or staff member be dedicated to one special need population. Within the confines of the existing budget and program regulations, the funding goals for the activities selected in the Plan reflect the needs identified in the Needs Assessment. In addition, eliminating any activity would potentially hamper the ability of the State to have the flexibility to meet the varied needs of Texans and adhere to program regulations. Therefore, no activity was entirely defunded.

In addition, while the State supports initiatives to serve special needs populations, holding funds in specific programs developed for one special need population might place the State in a position of having to deny an equally qualified person from access to assistance. Except for the set asides for special needs provided by statute, no other specific program for a special needs population has been developed. In addition, staff members are available to provide assistance to conveying program requirements as they relate to special needs populations.

7. Summary

The consolidated planning process occurs once every five years, so creating a comprehensive Plan is vital for CDBG, HOME, ESG, and HOPWA. Because of the Plan's authority to govern these programs, research from multiple sources, including other government plans, peer-reviewed journals, news sources, and fact sheets were used; valuable public input was gathered through roundtable meetings,

council/workgroup meetings, public hearings, online surveys, and an online forum; and an expansive public input process is scheduled for the draft Plan.

The format of the Plan is mandated by an online form developed by HUD. HUD has provided an online template for grantees, through its planning and reporting system called IDIS. The questions in bold and many of the tables are created automatically by IDIS. After the Plan is received by HUD, the goals in the Plan are reported each year in another document called the Consolidated Annual Performance Evaluation Report (“CAPER”), which is also produced in IDIS.

The Process

PR-05 Lead & Responsible Agencies 24 CFR 91.300(b)

1. Describe agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
CDBG Administrator		Texas Department of Agriculture
HOPWA Administrator		Texas Department of State Health Services
HOME Administrator	TEXAS	Texas Department of Housing and Community Affairs
ESG Administrator	TEXAS	Texas Department of Housing and Community Affairs

Table 1 – Responsible Agencies

Narrative

The Texas Department of Housing and Community Affairs (“TDHCA”) administers the Emergency Solutions Grants (“ESG”) Program and the HOME Investment Partnerships (“HOME”) Program; the Texas Department of Agriculture (“TDA”) administers the Community Development Block Grant (“CDBG”) Program; and the Texas Department of State Health Services (“DSHS”) administers the Housing Opportunities for Persons with AIDS (“HOPWA”) Program. All of these programs, known collectively as Community Planning and Development (“CPD”) Programs, are covered in the 2015-2019 State of Texas Consolidated Plan (“Plan”). TDHCA is the entity responsible for overseeing the development of the Plan.

Key Organizational Events

In 1991, the 72nd Texas Legislature created TDHCA. TDHCA’s enabling legislation combined programs from the Texas Housing Agency, the Texas Department of Community Affairs, and the Community Development Block Grant Program from the Texas Department of Commerce. Effective September 1, 2002, in accordance with Senate Bill 322, the Manufactured Housing Division became an independent entity administratively attached to TDHCA.

The CDBG Program was transferred from TDHCA to the newly-created Office of Rural Community Affairs, later called the Texas Department of Rural Affairs. As of October 1, 2011, the program is administered by TDA. Through an interagency agreement with TDA, TDHCA administers 2.5% of the CDBG funds which are designated for the Self-Help Centers (“SHCs”) along the Texas-Mexico border. DSHS administers HOPWA.

With the exception of the Section 8 Housing Choice Voucher Program, TDHCA, TDA, and DSHS administer their programs and services through a network of organizations across Texas and do not typically fund individuals directly. Depending on the program, organizations include units of local government, councils of governments, nonprofit organizations, for-profit organizations, Administrative Agencies ("AA"), Public Housing Authorities ("PHAs"), and Community Housing Development Organizations ("CHDOs").

Consolidated Plan Public Contact Information

ESG and HOME Contact Information:

Texas Department of Housing and Community Affairs, PO Box 13941, Austin, TX 78711-3941. (800) 525-0657. <http://www.tdhca.state.tx.us/>

CDBG Contact Information:

Texas Department of Agriculture, Office of Rural Affairs, PO Box 12847, Austin, TX 78711-2847. (800) 835-5832. <http://texasagriculture.gov/Home/ContactUs.aspx>

HOPWA Contact Information:

DSHS HIV/STD Prevention and Care Branch, HIV Care Services Group, HOPWA Program, PO Box 149347, Mail Code 1873, Austin, TX 78714-9347. (512) 533-3000.
<http://www.dshs.state.tx.us/hivstd/hopwa/default.shtm>

PR-10 Consultation - 91.110, 91.300(b); 91.315(l)

1. Introduction

Before the draft 2015-2019 Plan was created, several consultations were conducted. To gather a variety of input, State staff began consultations in April 2014, several months before drafting the Plan, reaching a wide variety of organizations, as shown in the chart in this section.

A public hearing was held on July 23, 2014, to gather input on the development of the Plan. TDHCA, as lead agency of the consolidated planning process, led the hearing, with staff in attendance from DSHS and TDA. There were 12 people in attendance, and testimony was received orally and in writing. These comments are included in the Citizen Participation Outreach question in Process Section 15.

Both before and after the public hearing, a more informal method of gathering input was used: the Single Family Programs Roundtable. These Roundtables are regularly held to gather input that informs TDHCA's single-family activities, including the HOME Program, Housing Trust Fund, Office of Colonia Initiatives ("OCI"), and the Neighborhood Stabilization Program. The roundtable format is an open discussion between administrators, advocates, stakeholders, and TDHCA staff. The agenda for the April 3, 2014, and August 13, 2014, Single Family Roundtables included a request for input in the drafting of the Plan, as well as information on the reservation process to fund activities; updates on loan policies; notice of planned training and technical assistance on income eligibility and lender requirements; training survey results; fair housing and affirmative marketing; uniform single family contracts and agreements; uniform applications and forms; the enforcement rule and amendments to the Single Family Umbrella Rule.

In an effort to gather information from specific audiences, TDHCA used technology to communicate efficiently. Online surveys increase the response rate of participants as well as allowing for faster data analysis, as illustrated in the ESG electronic survey, described below. Also, an Online Forum was held from July 11-31, 2014, for input on the development of the Plan. Several housing needs and community development topics were posted, such as needs for specific types of housing, how best to define at-risk of homelessness, and how public policies may negatively affect communities. Community development needs topics included capacity building for administration of programs in rural areas, and effects of the current drought in Texas. The Online Forum was advertised at workgroups and committees as well as on social media.

An online presence allows TDHCA to reach out to encourage participation and consultation. The External Affairs Division of TDHCA has implemented a social media presence, specifically through Twitter and Facebook. Numerous tweets and posts were sent during the consultation phase of the public input process and will be sent during the public comment period on the draft Plan. Furthermore, TDHCA sends out notices via voluntary email lists, where subscribed individuals and entities can receive email updates on TDHCA information, announcements, and trainings. Use of technology allows fast communication to a large audience.

Before drafting the Plan, TDHCA, TDA, and DSHS met with various organizations concerning the prioritization and allocation of CPD resources, as described below. During the comment period of the draft Plan, public comment will be sought from these groups as well.

Provide a concise summary of the state's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(l))

The State worked to enhance coordination between public and assisted housing providers, and private and governmental health, mental health and service agencies for the Plan in various ways. For example, TDHCA staff routinely attends inter- and intra-agency meetings to educate and coordinate housing and services, as described in Strategic Plan Section 35, Anticipated Resources, and Action Plan Section 65, Homeless and Other Special Needs. Input was also taken during several meetings, if any were offered, and input was sometimes received after the meetings were concluded.

DSHS contracts with seven AAs across the State to provide administrative support in implementing the State's HOPWA formula program. AAs work with HIV Planning Councils in major metropolitan areas and with other organizations and stakeholders outside the major metropolitan areas to develop comprehensive HIV Services plans and needs assessments, which are developed through consultation with clients and other stakeholders through interviews, surveys, focus groups, and/or public hearings. AAs must communicate with stakeholders through disseminating written copies of services plans, posting the plans on the internet, town hall meetings, and advisory groups. Project Sponsors work closely with the local PHA offices to identify and establish relationships with other organizations that may have available resources. This ongoing collaboration provides access to organizations and programs, such as the housing choice vouchers; Continuum of Care ("CoC"); community health clinics; churches and private foundations; and Ryan White and HIV Planning Councils. DSHS held a Texas HOPWA Stakeholders Consultation June 5, 2014, in Fort Worth to discuss strategies for the top HOPWA housing issues that agencies are facing and ideas for increased collaboration. Also, health and child welfare agencies were consulted in regards to lead-based paint issues of the Plan. A draft of the sections regarding lead-based paint was sent from TDHCA to DSHS to ensure that the State was in compliance with the agency that oversees lead-based paint regulation.

TDHCA announced its new fair housing email list on July 17, 2014. This email list is not only meant for fair housing organizations, but also other organizations who wish to be updated on fair housing-related TDHCA news, event information, and announcements. Because of the time needed for organizations to sign up to the email list, other email lists were used to advertise consultations. However, fair housing organizations received notice of the consultations, as evidenced by their participation in the Online Forum and Single Family Roundtables.

TDA consulted with local governments both in person and through web-based meetings. As a part of the traditional CDBG planning process, public hearings were held in each of the 24 Council of Government planning regions. Each Regional Review Committee, composed of local elected officials, discussed local funding priorities for the Community Development Fund and adopted scoring criteria to implement those priorities. TDA also conducted two webinars to provide information regarding changes proposed for the CDBG program. Local governments and professional service providers associated with the program from across the state participated in the online presentation and discussion and provided written feedback to the agency. These same proposals were also discussed in the Regional Review Committee public hearings. Changes to the Community Development Fund, the largest funding category in the CDBG program, were postponed as a result of these consultations and will receive further review and revision.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness

The Texas Interagency Council for the Homeless (“TICH”) was created in 1989 to coordinate the State’s homeless resources and services. The TICH consists of representatives from eleven state agencies that serve persons experiencing or at risk of homelessness. Membership also includes representatives appointed by the office of the governor, the lieutenant governor, and the speaker of the house. The council receives no funding and has no full-time staff, but receives facilitation and advisory support from TDHCA. TICH’s major mandates include:

- evaluating and helping coordinate the delivery of services for the homeless in Texas;
- increasing the flow of information among service providers and appropriate authorities;
- providing technical assistance to TDHCA in assessing the need for housing for people with special needs;
- developing, in coordination with TDHCA and the Health and Human Services Commission (“HHSC”), a strategic plan to address the needs of the homeless; and
- maintaining a central resource and information center for the homeless.

The TICH has four committees: Housing and Supportive Services; Homelessness Prevention; Data, Research and Analysis; and State Infrastructure. In addition, the Texas Interagency Council for the Homeless has been meeting during 2013 with the CoCs to coordinate homeless services. These efforts are reinforced by the 2011 update to HUD’s 24 Code of Federal Regulation (“CFR”) Part 91 that requires ESG recipients to expand consultation with community partners and CoCs in the formation of consolidated planning documents. The consultation must address the allocation of resources; development of performance standards and evaluation; and development of funding, policy and procurements for operating state-required Homeless Management Information Systems (“HMIS”). The TICH held two meetings during the development of the draft Plan and TDHCA twice took input from the TICH on housing and community development needs.

Describe consultation with the Continuum(s) of Care that serves the state in determining how to allocate ESG funds, develop performance standards and evaluate outcomes, and develop funding, policies and procedures for the administration of HMIS

TDHCA releases its annual ESG survey, which seeks direct program input from Continua of Care (“CoCs”) and their member agencies regarding allocation of ESG funds, development of performance standards and outcomes evaluation, and development of funding, policies, and procedures for the administration of HMIS. On January 9, 2014, TDHCA released a survey to receive input of CoCs in the State of Texas on the allocation of funding, performance standards and HMIS policies and procedures for its 2014 ESG funds. Comments were received from fourteen agencies representing six CoCs. Notice of the survey was sent out via listserv announcement. Comments were collected electronically. Comments received that impacted the 2014 allocation of funds were considered in planning the 2014 competitive award cycle, and comments will continue to be considered in future planning.

Persons who commented on the 2014 ESG survey generally supported the TDHCA method of allocation and did not support the idea of limiting funding to applicants that do not receive direct funding from HUD. Emergency shelter, homelessness prevention, and rapid re-housing remain the highest needs

among the commenters. Commenters generally support the idea of direct ESG funding to the CoCs but clearly require more information and clarity on the actual administrative process should this funding method be used. In addition, commenters requested that TDHCA align its reporting to mirror the HMIS. TDHCA reporting is based on HUD's requirements for the Consolidated Annual Performance Report ("CAPER"). As HUD moves to revise the CAPER to more closely reflect HMIS, TDHCA will follow.

TDHCA further consults with CoCs through involvement in the TICH and through participation in the Texas Conference on Ending Homelessness. TDHCA is currently piloting a direct funding program with one CoC that will inform future coordination with all CoCs.

Provide a concise summary of the state's activities to enhance coordination with local jurisdictions serving Colonias and organizations working within Colonias communities.

There are two main methods in which TDHCA coordinates its work with other colonia-serving entities. One relates to the Colonia Self Help Center Program which funds specific Texas-border county governments with four-year contracts. Awards and funding associated with this program are reviewed and recommended by a Colonia Resident Advisory Group ("C-RAC"), which is a group of colonia residents who live in the specific colonias served by the centers. The other coordination effort relates to a cross-agency effort organized by the Texas Secretary of State that generates structured communications and data collection in conjunction with other state agencies serving colonias with their respective programs.

On a very frequent basis—weekly or more often—TDHCA provides guidance and oversight to the county governments with which TDHCA has executed a SHC contract. Somewhat less often, TDHCA provides guidance and technical assistance to the housing subgrantees with whom each respective county has contracted to achieve specific deliverables per their individualized SHC subcontract. Every one to two years, TDHCA organizes and implements a workshop for all eligible counties and their subgrantees to review rules, best practices, and exchange other program updates. Periodically, TDHCA convenes a meeting with C-RAC. This grass-roots-style committee approves contracts, evaluates county recommendations, and provides TDHCA and the counties guidance on programming and activities in the colonias. Lastly, approximately every two years, TDHCA updates its SHC Program rules, and initiates this process by first soliciting comment from the public at large for critiques of the current rules and suggestions for changes.

As a part of the process discussed above, TDA met with elected officials from counties serving colonia areas. The local leaders discussed funding priorities for the Community Development Fund, including projects that could serve colonia areas.

On a quarterly basis, TDHCA and TDA convene with several other state agencies that directly serve colonia residents in the areas of utilities infrastructure, transportation infrastructure, water/water water, health services, housing, and consumer issues. This group is called the Colonia Interagency Infrastructure Coordination Work Group and is organized by the Texas Office of the Secretary of State's Colonia Initiatives Program. This group has been meeting regularly since approximately 2007 when Texas passed legislation requiring the systematic identification and classification of Texas colonias, and the tracking of colonia-serving state-funded projects. The overarching goal of the workgroup is to stop the proliferation of colonias and improve the health, safety, and quality of life for colonia residents in the Texas-Mexico border region. By classifying colonias based on their level of infrastructure and access

to public health services, various state agencies, and the Texas Legislature are able to prioritize funding and target colonias with critical needs (Texas Office of the Secretary of State, 2010). Besides TDHCA and TDA, other agency members of this work group include the Texas Water Development Board ("TWDB"), the Texas Commission on Environmental Quality, the Texas Department of Transportation, HHSC, and DSHS.

2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdictions consultations with housing, social service agencies and other entities

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	La Posada Providencia
	Agency/Group/Organization Type	Services-homeless
	What section of the Plan was addressed by Consultation?	Homelessness Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency participated in electronic survey and participated in consultation during Texas Homeless Summit. Anticipated outcome is closer coordination among and within CoCs and between CoCs and TDHCA.
2	Agency/Group/Organization	South Texas Adult Resource And Training Center
	Agency/Group/Organization Type	Services-homeless
	What section of the Plan was addressed by Consultation?	Homelessness Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency participated in electronic survey and participated in consultation during Texas Homeless Summit. Anticipated outcome is closer coordination among and within CoCs and between CoCs and TDHCA.
3	Agency/Group/Organization	Faith Mission And Help Center
	Agency/Group/Organization Type	Services-homeless
	What section of the Plan was addressed by Consultation?	Homelessness Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency participated in electronic survey and participated in consultation during Texas Homeless Summit. Anticipated outcome is closer coordination among and within CoCs and between CoCs and TDHCA.
4	Agency/Group/Organization	Project Vida
	Agency/Group/Organization Type	Services-homeless
	What section of the Plan was addressed by Consultation?	Homelessness Strategy

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency participated in electronic survey and participated in consultation during Texas Homeless Summit. Anticipated outcome is closer coordination among and within CoCs and between CoCs and TDHCA.
5	Agency/Group/Organization	Youth And Family Alliance, dba Lifeworks
	Agency/Group/Organization Type	Services-homeless
	What section of the Plan was addressed by Consultation?	Homelessness Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency participated in electronic survey and participated in consultation during Texas Homeless Summit. Anticipated outcome is closer coordination among and within CoCs and between CoCs and TDHCA.
6	Agency/Group/Organization	Covenant House Texas
	Agency/Group/Organization Type	Services-homeless
	What section of the Plan was addressed by Consultation?	Homelessness Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency participated in electronic survey and participated in consultation during Texas Homeless Summit. Anticipated outcome is closer coordination among and within CoCs and between CoCs and TDHCA.
8	Agency/Group/Organization	Texas Homeless Network
	Agency/Group/Organization Type	Services-homeless
	What section of the Plan was addressed by Consultation?	Homelessness Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency participated in electronic survey and participated in consultation during Texas Homeless Summit. Anticipated outcome is closer coordination among and within CoCs and between CoCs and TDHCA.
9	Agency/Group/Organization	Bay Area Turning Point Inc
	Agency/Group/Organization Type	Services-homeless
	What section of the Plan was addressed by Consultation?	Homelessness Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency participated in electronic survey and participated in consultation during Texas Homeless Summit. Anticipated outcome is closer coordination among and within CoCs and between CoCs and TDHCA.
10	Agency/Group/Organization	Family Abuse Center
	Agency/Group/Organization Type	Services-homeless
	What section of the Plan was addressed by Consultation?	Homelessness Strategy

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency participated in electronic survey and participated in consultation during Texas Homeless Summit. Anticipated outcome is closer coordination among and within CoCs and between CoCs and TDHCA.
11	Agency/Group/Organization	Family Violence Prevention Services, Inc.
	Agency/Group/Organization Type	Services-homeless
	What section of the Plan was addressed by Consultation?	Homelessness Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency participated in electronic survey and participated in consultation during Texas Homeless Summit. Anticipated outcome is closer coordination among and within CoCs and between CoCs and TDHCA.
12	Agency/Group/Organization	Shelter Agencies for Families East Texas
	Agency/Group/Organization Type	Services-homeless
	What section of the Plan was addressed by Consultation?	Homelessness Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency participated in electronic survey and participated in consultation during Texas Homeless Summit. Anticipated outcome is closer coordination among and within CoCs and between CoCs and TDHCA.
13	Agency/Group/Organization	Advocacy Outreach
	Agency/Group/Organization Type	Services-homeless
	What section of the Plan was addressed by Consultation?	Homelessness Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency participated in electronic survey and participated in consultation during Texas Homeless Summit. Anticipated outcome is closer coordination among and within CoCs and between CoCs and TDHCA.
14	Agency/Group/Organization	Loaves & Fishes of the Rio Grande Valley, Inc.
	Agency/Group/Organization Type	Services-homeless
	What section of the Plan was addressed by Consultation?	Homelessness Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency participated in electronic survey and participated in consultation during Texas Homeless Summit. Anticipated outcome is closer coordination among and within CoCs and between CoCs and TDHCA.
15	Agency/Group/Organization	Twin City Mission
	Agency/Group/Organization Type	Services-homeless
	What section of the Plan was addressed by Consultation?	Homelessness Strategy

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency participated in electronic survey and participated in consultation during Texas Homeless Summit. Anticipated outcome is closer coordination among and within CoCs and between CoCs and TDHCA.
16	Agency/Group/Organization	Habitat For Humanity Of Victoria
	Agency/Group/Organization Type	Housing Services-Education
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The organization attended TDHCA's Single Family Roundtable on April 3, 2014, at the Brown-Heatly Building, 4900 N. Lamar Blvd., Austin, TX 78751. The Habitat for Humanity organization performs homebuyer education. TDHCA staff was present and discussion included single family housing stock and needs. This input is being considered for the Strategic Plan and One Year Action Plan.
18	Agency/Group/Organization	Public Management Incorporated
	Agency/Group/Organization Type	Housing HOME Consultant
	What section of the Plan was addressed by Consultation?	Housing Need Assessment HOME Investment Partnerships Program Processes
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The organization attended the TDHCA's Single Family Roundtable on April 3, 2014. TDHCA staff was present and discussion included the processes used in the HOME Program and the lack of funding to meet the current needs. This input is being considered for the Strategic Plan and One Year Action Plan.
19	Agency/Group/Organization	Austin Habitat for Humanity
	Agency/Group/Organization Type	Housing Services-Education
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The organization attended the TDHCA's Single Family Roundtable on April 3, 2014. The Habitat for Humanity organization performs homebuyer education. TDHCA staff was present and discussion included the single family housing stock and needs. This input is being considered for the Strategic Plan and One Year Action Plan.
20	Agency/Group/Organization	Neighborhood Land Corp./Trinity Habitat
	Agency/Group/Organization Type	Housing Services-Education
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The organization attended the TDHCA's Single Family Roundtable on April 3, 2014. TDHCA staff was present and discussion included the single family housing stock and needs. This input is being considered for the Strategic Plan and One Year Action Plan.
21	Agency/Group/Organization	Easter Seals of Central Texas
	Agency/Group/Organization Type	Housing Services - Housing Services-Elderly Persons Services-Persons with Disabilities Services-Health
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The organization attended the TDHCA's Single Family Roundtables on April 3, 2014 and August 13, 2014. TDHCA staff was present and discussion included the lack of HOME funding in certain areas of the state and difficulty in accessing funds for the amount of need. This input is being considered for the Strategic Plan and One Year Action Plan. The organization also participated in the Housing and Health Services Coordination Council (HHSCC) Quarterly meeting on July 9, 2014. The purpose of the quarterly meetings is to increase state efforts to offer service-enriched housing through increased coordination of housing and health services. The organization also attended the Disability Advisory Workgroup ("DAW") on April 24, 2014. TDHCA maintains the DAW to provide ongoing guidance on how TDHCA's programs, including ESG and HOME, can most effectively serve persons with disabilities.
22	Agency/Group/Organization	GrantWorks, Inc.
	Agency/Group/Organization Type	Housing HOME Consultant
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis HOME Investment Partnerships Program Processes

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The organization attended the TDHCA's Single Family Roundtables on April 3, 2014 and August 13, 2014. TDHCA staff was present and discussion included the processes used in the HOME Program, as well as significant need in single family housing. The organization recommendation was to not use HOME funds to leverage with Low Income Housing Tax Credit ("LIHTC") funds because there is greater need for single family housing than multifamily housing. This input is being considered for the Strategic Plan and One Year Action Plan. Organization provided public comment at the July 23, 2014 public hearing on the Consolidated Plan held in Austin at the William Travis Building. Comment was made on the HOME Housing Rehab Assistance program and the HOME program Single-family Reservation System. Public comment summary and response is provided as an attachment in Section AD-25. Representatives from TDHCA, TDA, and DSHS were present. The hearing gave the public an opportunity to provide comment on housing and community development needs, including priority non-housing community development needs, before the draft Plan has been completed.
23	Agency/Group/Organization	Habitat For Humanity (Tyler)
	Agency/Group/Organization Type	Housing Services-Education
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The organization attended the TDHCA's Single Family Roundtable on April 3, 2014. The Habitat for Humanity organization performs homebuyer education. TDHCA staff was present and discussion included the single family housing stock and needs. This input is being considered for the Strategic Plan and One Year Action Plan.
24	Agency/Group/Organization	Hunter And Hunter
	Agency/Group/Organization Type	Housing HOME Consultant
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The organization attended the TDHCA's Single Family Roundtables on April 3, 2014 and August 13, 2014. TDHCA staff was present. The Consultant offered an idea on how to improve the HOME Reservation and Contract Systems. This input is being considered for the Strategic Plan and One Year Action Plan.

25	Agency/Group/Organization	Langford Community Management Services
	Agency/Group/Organization Type	Housing HOME Consultant
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis HOME Investment Partnerships Program Processes
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The organization attended the TDHCA's Single Family Roundtables on April 3, 2014 and August 13, 2014. TDHCA staff was present and discussion included the processes used in the HOME Program and the lack of funding to meet the current needs. This input is being considered for the Strategic Plan and One Year Action Plan. Organization provided public comment at the July 23, 2014 public hearing on the Consolidated Plan held in Austin at the William Travis Building. Comment was made on the HOME Housing Rehab Assistance program and the HOME program Single-family Reservation System. Public comment summary and response is provided as an attachment in Section AD-25. Representatives from TDHCA, TDA, and DSHS were present. The hearing gave the public an opportunity to provide comment on housing and community development needs, including priority non-housing community development needs, before the draft Plan has been completed.
26	Agency/Group/Organization	Guadalupe Neighborhood Development Corporation
	Agency/Group/Organization Type	Housing Community Housing Development Organization Neighborhood Organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The organization attended the TDHCA's Single Family Roundtable on April 3, 2014. The organization had questions on capacity building processes for Community Housing Development Organizations. TDHCA created a Single Family Training Academy based on the Weatherization Assistance Program Training Academy created during the American Recovery and Reinvestment Act of 2009 to help with capacity building.
27	Agency/Group/Organization	Meals on Wheels and More, Inc.
	Agency/Group/Organization Type	Housing Services - Housing Services-Elderly Persons Services-Persons with Disabilities Services-Health

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The organization attended the DAW on April 24, 2014. TDHCA maintains the DAW to provide ongoing guidance on how TDHCA's programs, including ESG and HOME, can most effectively serve persons with disabilities. The organization also attended the TDHCA's Single Family Roundtable on April 3, 2014. Organization had questions about eligibility of manufactured housing to receive HOME and Housing Trust Fund rehabilitation funds and requested access to TDHCA data to provide a case for housing need to stakeholders. The outcome will be clarified in revisions to the Single Family Umbrella Rule on manufactured housing eligibility.
28	Agency/Group/Organization	Traylor and Associates
	Agency/Group/Organization Type	Housing Planning organization HOME Consultant
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The organization attended the TDHCA's Single Family Roundtable on April 3, 2014. TDHCA staff was present and discussion included the processes used in the HOME Program and the lack of funding to meet the current needs. The organization also participated in the TDHCA Environmental Clearance 2-day Workshop for Single Family Construction Projects on June 19-20, 2014, at Commons Learning Center (J.J. Pickle Research Campus), 10100 Burnet Road, Austin, TX. The anticipated outcome of the consultation was to accept input on community actions to address lead-based paint hazards, increased access to housing without lead-based paint hazards, and community actions planned to reduce lead-based paint hazards.
29	Agency/Group/Organization	Texas Association of Community Development Corporations
	Agency/Group/Organization Type	Regional organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The organization attended the TDHCA's Single Family Roundtable on April 3, 2014. TDHCA staff was present and discussion included the single family housing stock and needs. This input is being considered for the Strategic Plan and One Year Action Plan.

30	Agency/Group/Organization	Tarrant County
	Agency/Group/Organization Type	Other government - County
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs HOPWA Strategy Economic Development Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency participated in DSHS' Texas HOPWA Stakeholders Consultation held on June 5, 2014. The purpose of the consultation was a roundtable exercise to discuss strategies for the top housing issues that agencies are facing with HOPWA client populations throughout Texas and ideas for increased collaboration.
31	Agency/Group/Organization	South Texas Development Council
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	HOPWA Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency participated in the DSHS Texas HOPWA Stakeholders Consultation held on June 5, 2014. The purpose of the consultation was a roundtable exercise to discuss strategies for the top housing issues that agencies are facing with HOPWA client populations throughout Texas and ideas for increased collaboration.
32	Agency/Group/Organization	Brazos Valley Council of Governments
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	HOPWA Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency participated in the DSHS Texas HOPWA Stakeholders Consultation held on June 5, 2014. The purpose of the consultation was a roundtable exercise to discuss strategies for the top housing issues that agencies are facing with HOPWA client populations throughout Texas and ideas for increased collaboration.
33	Agency/Group/Organization	Bexar County
	Agency/Group/Organization Type	Other government - County
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs HOPWA Strategy Economic Development Market Analysis

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency participated in the DSHS Texas HOPWA Stakeholders Consultation held on June 5, 2014. The purpose of the consultation was a roundtable exercise to discuss strategies for the top housing issues that agencies are facing with HOPWA client populations throughout Texas and ideas for increased collaboration.
34	Agency/Group/Organization	Dallas County Health And Human Services
	Agency/Group/Organization Type	Other government - County
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs HOPWA Strategy Economic Development Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency participated in the DSHS Texas HOPWA Stakeholders Consultation held on June 5, 2014. The purpose of the consultation was a roundtable exercise to discuss strategies for the top housing issues that agencies are facing with HOPWA client populations throughout Texas and ideas for increased collaboration.
35	Agency/Group/Organization	The Houston Regional HIV/AIDS Resource Group, Inc.
	Agency/Group/Organization Type	Nonprofit
	What section of the Plan was addressed by Consultation?	HOPWA Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency participated in the DSHS Texas HOPWA Stakeholders Consultation held on June 5, 2014. The purpose of the consultation was a roundtable exercise to discuss strategies for the top housing issues that agencies are facing with HOPWA client populations throughout Texas and ideas for increased collaboration.
36	Agency/Group/Organization	Samaritan House
	Agency/Group/Organization Type	Services-Persons with HIV/AIDS Non Profit
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs HOPWA Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency participated in the DSHS Texas HOPWA Stakeholders Consultation held on June 5, 2014. The purpose of the consultation was a roundtable exercise to discuss strategies for the top housing issues that agencies are facing with HOPWA client populations throughout Texas and ideas for increased collaboration.

37	Agency/Group/Organization	Catholic Charities of the Archdiocese Of Galveston-Houston
	Agency/Group/Organization Type	Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services - Victims Non Profit
	What section of the Plan was addressed by Consultation?	HOPWA Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency participated in the DSHS Texas HOPWA Stakeholders Consultation held on June 5, 2014. The purpose of the consultation was a roundtable exercise to discuss strategies for the top housing issues that agencies are facing with HOPWA client populations throughout Texas and ideas for increased collaboration.
38	Agency/Group/Organization	Texas Council for Developmental Disabilities
	Agency/Group/Organization Type	Services-Persons with Disabilities Services-Employment Other government - State Planning organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Organization participated in the DAW on April 24, 2014. TDHCA maintains the DAW to provide ongoing guidance on how TDHCA's programs, including ESG and HOME, can most effectively serve persons with disabilities. The organization also attended the TDHCA's Single Family Roundtable on April 3, 2014. TDHCA staff was present and discussion included the single family housing stock and needs. This input is being considered for the Strategic Plan and One Year Action Plan.
39	Agency/Group/Organization	Maverick County Hospital District
	Agency/Group/Organization Type	Services-Persons with HIV/AIDS Publicly Funded Institution/System of Care
	What section of the Plan was addressed by Consultation?	HOPWA Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency participated in the DSHS Texas HOPWA Stakeholders Consultation held on June 5, 2014. The purpose of the consultation was a roundtable exercise to discuss strategies for the top housing issues that agencies are facing with HOPWA client populations throughout Texas and ideas for increased collaboration.

40	Agency/Group/Organization	Victoria City-County Health Department
	Agency/Group/Organization Type	Services-Persons with HIV/AIDS Health Agency Publicly Funded Institution/System of Care Other government - County Other government - Local
	What section of the Plan was addressed by Consultation?	HOPWA Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency participated in the DSHS Texas HOPWA Stakeholders Consultation held on June 5, 2014. The purpose of the consultation was a roundtable exercise to discuss strategies for the top housing issues that agencies are facing with HOPWA client populations throughout Texas and ideas for increased collaboration.
41	Agency/Group/Organization	Alamo Area Resource Center
	Agency/Group/Organization Type	Services-Persons with HIV/AIDS
	What section of the Plan was addressed by Consultation?	HOPWA Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency participated in the DSHS Texas HOPWA Stakeholders Consultation held on June 5, 2014. The purpose of the consultation was a roundtable exercise to discuss strategies for the top housing issues that agencies are facing with HOPWA client populations throughout Texas and ideas for increased collaboration.
42	Agency/Group/Organization	Community Action, Inc. of Hayes, Caldwell, & Blanco Counties
	Agency/Group/Organization Type	Services-Children Services-Elderly Persons Services-Persons with HIV/AIDS Services-Health Services-Education
	What section of the Plan was addressed by Consultation?	HOPWA Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency participated in the DSHS Texas HOPWA Stakeholders Consultation held on June 5, 2014. The purpose of the consultation was a roundtable exercise to discuss strategies for the top housing issues that agencies are facing with HOPWA client populations throughout Texas and ideas for increased collaboration.

43	Agency/Group/Organization	United Way of Greater Fort Hood
	Agency/Group/Organization Type	Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence
	What section of the Plan was addressed by Consultation?	HOPWA Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency participated in the DSHS Texas HOPWA Stakeholders Consultation held on June 5, 2014. The purpose of the consultation was a roundtable exercise to discuss strategies for the top housing issues that agencies are facing with HOPWA client populations throughout Texas and ideas for increased collaboration.
44	Agency/Group/Organization	Waco/McLennan County Public Health District
	Agency/Group/Organization Type	Services-Persons with HIV/AIDS Health Agency Publicly Funded Institution/System of Care Other government - County
	What section of the Plan was addressed by Consultation?	HOPWA Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency participated in the DSHS Texas HOPWA Stakeholders Consultation held on June 5, 2014. The purpose of the consultation was a roundtable exercise to discuss strategies for the top housing issues that agencies are facing with HOPWA client populations throughout Texas and ideas for increased collaboration.
45	Agency/Group/Organization	Unity Partners dba Project Unity
	Agency/Group/Organization Type	Services-Children Services-Persons with HIV/AIDS Services-Victims of Domestic Violence
	What section of the Plan was addressed by Consultation?	HOPWA Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency participated in the DSHS Texas HOPWA Stakeholders Consultation held on June 5, 2014. The purpose of the consultation was a roundtable exercise to discuss strategies for the top housing issues that agencies are facing with HOPWA client populations throughout Texas and ideas for increased collaboration.
46	Agency/Group/Organization	Shannon Supportive Health Services
	Agency/Group/Organization Type	Services-Persons with HIV/AIDS Services-Health
	What section of the Plan was addressed by Consultation?	HOPWA Strategy

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency participated in the DSHS Texas HOPWA Stakeholders Consultation held on June 5, 2014. The purpose of the consultation was a roundtable exercise to discuss strategies for the top housing issues that agencies are facing with HOPWA client populations throughout Texas and ideas for increased collaboration.
47	Agency/Group/Organization	Your Health Clinic
	Agency/Group/Organization Type	Services-Persons with HIV/AIDS Services-Health
	What section of the Plan was addressed by Consultation?	HOPWA Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency participated in the DSHS Texas HOPWA Stakeholders Consultation held on June 5, 2014. The purpose of the consultation was a roundtable exercise to discuss strategies for the top housing issues that agencies are facing with HOPWA client populations throughout Texas and ideas for increased collaboration.
48	Agency/Group/Organization	Panhandle AIDS Support Organization
	Agency/Group/Organization Type	Services-Persons with HIV/AIDS
	What section of the Plan was addressed by Consultation?	HOPWA Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency participated in the DSHS Texas HOPWA Stakeholders Consultation held on June 5, 2014. The purpose of the consultation was a roundtable exercise to discuss strategies for the top housing issues that agencies are facing with HOPWA client populations throughout Texas and ideas for increased collaboration.
49	Agency/Group/Organization	Permian Basin Community Centers
	Agency/Group/Organization Type	Services-Persons with HIV/AIDS
	What section of the Plan was addressed by Consultation?	HOPWA Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency participated in the DSHS Texas HOPWA Stakeholders Consultation held on June 5, 2014. The purpose of the consultation was a roundtable exercise to discuss strategies for the top housing issues that agencies are facing with HOPWA client populations throughout Texas and ideas for increased collaboration.
50	Agency/Group/Organization	South Plains Community Action Agency
	Agency/Group/Organization Type	Services-Persons with HIV/AIDS
	What section of the Plan was addressed by Consultation?	HOPWA Strategy

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency participated in the DSHS Texas HOPWA Stakeholders Consultation held on June 5, 2014. The purpose of the consultation was a roundtable exercise to discuss strategies for the top housing issues that agencies are facing with HOPWA client populations throughout Texas and ideas for increased collaboration.
51	Agency/Group/Organization	Sun City Behavioral Health Care
	Agency/Group/Organization Type	Services-Persons with HIV/AIDS
	What section of the Plan was addressed by Consultation?	HOPWA Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency participated in the DSHS Texas HOPWA Stakeholders Consultation held on June 5, 2014. The purpose of the consultation was a roundtable exercise to discuss strategies for the top housing issues that agencies are facing with HOPWA client populations throughout Texas and ideas for increased collaboration.
52	Agency/Group/Organization	Triangle Aids Network
	Agency/Group/Organization Type	Services-Persons with HIV/AIDS
	What section of the Plan was addressed by Consultation?	HOPWA Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency participated in the DSHS Texas HOPWA Stakeholders Consultation held on June 5, 2014. The purpose of the consultation was a roundtable exercise to discuss strategies for the top housing issues that agencies are facing with HOPWA client populations throughout Texas and ideas for increased collaboration.
53	Agency/Group/Organization	Health Horizons of East Texas
	Agency/Group/Organization Type	Services-Persons with HIV/AIDS
	What section of the Plan was addressed by Consultation?	HOPWA Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency participated in the DSHS Texas HOPWA Stakeholders Consultation held on June 5, 2014. The purpose of the consultation was a roundtable exercise to discuss strategies for the top housing issues that agencies are facing with HOPWA client populations throughout Texas and ideas for increased collaboration.
54	Agency/Group/Organization	AIDS Foundation of Houston
	Agency/Group/Organization Type	Services-Persons with HIV/AIDS
	What section of the Plan was addressed by Consultation?	HOPWA Strategy

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency participated in the DSHS Texas HOPWA Stakeholders Consultation held on June 5, 2014. The purpose of the consultation was a roundtable exercise to discuss strategies for the top housing issues that agencies are facing with HOPWA client populations throughout Texas and ideas for increased collaboration.
55	Agency/Group/Organization	Special Health Resources
	Agency/Group/Organization Type	Services-Persons with HIV/AIDS
	What section of the Plan was addressed by Consultation?	HOPWA Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency participated in the DSHS Texas HOPWA Stakeholders Consultation held on June 5, 2014. The purpose of the consultation was a roundtable exercise to discuss strategies for the top housing issues that agencies are facing with HOPWA client populations throughout Texas and ideas for increased collaboration.
56	Agency/Group/Organization	City of Laredo Health Department HIV Program
	Agency/Group/Organization Type	Services-Persons with HIV/AIDS Publicly Funded Institution/System of Care Other government - Local
	What section of the Plan was addressed by Consultation?	HOPWA Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency participated in the DSHS Texas HOPWA Stakeholders Consultation held on June 5, 2014. The purpose of the consultation was a roundtable exercise to discuss strategies for the top housing issues that agencies are facing with HOPWA client populations throughout Texas and ideas for increased collaboration.
57	Agency/Group/Organization	Valley Aids Council
	Agency/Group/Organization Type	Services-Persons with HIV/AIDS
	What section of the Plan was addressed by Consultation?	HOPWA Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency participated in the DSHS Texas HOPWA Stakeholders Consultation held on June 5, 2014. The purpose of the consultation was a roundtable exercise to discuss strategies for the top housing issues that agencies are facing with HOPWA client populations throughout Texas and ideas for increased collaboration.
58	Agency/Group/Organization	Coastal Bend Wellness Foundation
	Agency/Group/Organization Type	Services-Persons with HIV/AIDS
	What section of the Plan was addressed by Consultation?	HOPWA Strategy

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency participated in the DSHS Texas HOPWA Stakeholders Consultation held on June 5, 2014. The purpose of the consultation was a roundtable exercise to discuss strategies for the top housing issues that agencies are facing with HOPWA client populations throughout Texas and ideas for increased collaboration.
59	Agency/Group/Organization	Big Country Aids Resources (BCAR)
	Agency/Group/Organization Type	Services-Persons with HIV/AIDS
	What section of the Plan was addressed by Consultation?	HOPWA Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency participated in the DSHS Texas HOPWA Stakeholders Consultation held on June 5, 2014. The purpose of the consultation was a roundtable exercise to discuss strategies for the top housing issues that agencies are facing with HOPWA client populations throughout Texas and ideas for increased collaboration.
60	Agency/Group/Organization	AIDS Outreach Center
	Agency/Group/Organization Type	Services-Persons with HIV/AIDS
	What section of the Plan was addressed by Consultation?	HOPWA Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency participated in the DSHS Texas HOPWA Stakeholders Consultation held on June 5, 2014. The purpose of the consultation was a roundtable exercise to discuss strategies for the top housing issues that agencies are facing with HOPWA client populations throughout Texas and ideas for increased collaboration.
61	Agency/Group/Organization	International AIDS Empowerment
	Agency/Group/Organization Type	Services-Persons with HIV/AIDS
	What section of the Plan was addressed by Consultation?	HOPWA Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency participated in the DSHS Texas HOPWA Stakeholders Consultation held on June 5, 2014. The purpose of the consultation was a roundtable exercise to discuss strategies for the top housing issues that agencies are facing with HOPWA client populations throughout Texas and ideas for increased collaboration.
62	Agency/Group/Organization	Legacy Counseling Center, Inc.
	Agency/Group/Organization Type	Services-Persons with HIV/AIDS
	What section of the Plan was addressed by Consultation?	HOPWA Strategy

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency participated in the DSHS Texas HOPWA Stakeholders Consultation held on June 5, 2014. The purpose of the consultation was a roundtable exercise to discuss strategies for the top housing issues that agencies are facing with HOPWA client populations throughout Texas and ideas for increased collaboration.
63	Agency/Group/Organization	AIDS Coalition of Coastal Texas Inc.
	Agency/Group/Organization Type	Services-Persons with HIV/AIDS
	What section of the Plan was addressed by Consultation?	HOPWA Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency participated in the DSHS Texas HOPWA Stakeholders Consultation held on June 5, 2014. The purpose of the consultation was a roundtable exercise to discuss strategies for the top housing issues that agencies are facing with HOPWA client populations throughout Texas and ideas for increased collaboration.
64	Agency/Group/Organization	Temple
	Agency/Group/Organization Type	Services - Housing Services-Persons with HIV/AIDS Other government - Local
	What section of the Plan was addressed by Consultation?	HOPWA Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency participated in the DSHS Texas HOPWA Stakeholders Consultation held on June 5, 2014. The purpose of the consultation was a roundtable exercise to discuss strategies for the top housing issues that agencies are facing with HOPWA client populations throughout Texas and ideas for increased collaboration.
65	Agency/Group/Organization	Killeen
	Agency/Group/Organization Type	Services - Housing Services-Persons with HIV/AIDS Other government - Local
	What section of the Plan was addressed by Consultation?	HOPWA Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency participated in the DSHS Texas HOPWA Stakeholders Consultation held on June 5, 2014. The purpose of the consultation was a roundtable exercise to discuss strategies for the top housing issues that agencies are facing with HOPWA client populations throughout Texas and ideas for increased collaboration.

66	Agency/Group/Organization	Mesquite
	Agency/Group/Organization Type	Services - Housing Services-Persons with HIV/AIDS Other government - Local
	What section of the Plan was addressed by Consultation?	HOPWA Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency participated in the DSHS Texas HOPWA Stakeholders Consultation held on June 5, 2014. The purpose of the consultation was a roundtable exercise to discuss strategies for the top housing issues that agencies are facing with HOPWA client populations throughout Texas and ideas for increased collaboration.
67	Agency/Group/Organization	Cornerstone Assistance Network
	Agency/Group/Organization Type	Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Services-Employment
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency participated in the Texas Interagency Council on Homelessness ("TICH") quarterly meetings on May 20, 2014 and July 28, 2014. TDHCA staff was present. Anticipated outcome of the consultation is greater coordination of the state's resources and services to address homelessness.
68	Agency/Group/Organization	Coastal Bend Center for Independent Living
	Agency/Group/Organization Type	Services-Persons with Disabilities
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency participated in the TICH quarterly meeting on May 20, 2014. TDHCA staff was present. Anticipated outcome of the consultation is greater coordination of the state's resources and services to address homelessness.
69	Agency/Group/Organization	City of Waco
	Agency/Group/Organization Type	Other government - Local Continuum of Care
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy Method of Distribution
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency participated in the TICH quarterly meeting on May 20, 2014. TDHCA staff was present. Anticipated outcome of the consultation is greater coordination of the state's resources and services to address homelessness.
70	Agency/Group/Organization	Texas State Affordable Housing Corporation
	Agency/Group/Organization Type	Housing Services - Housing Service-Fair Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy HOME Investment Partnerships Program Processes

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Organization participated in the DAW on April 24, 2014. TDHCA maintains the DAW to provide ongoing guidance on how TDHCA's programs, including ESG and HOME, can most effectively serve persons with disabilities. The organization also attended the TDHCA's Single Family Roundtable on April 3, 2014. TDHCA staff was present and discussion included the processes used in the HOME Program, especially the Reservation System. This input is being considered for the Strategic Plan, One Year Action Plan and upcoming Notices of Funding Availabilities' releases of funds. The organization also participated in the TICH quarterly meetings on May 20, 2014 and July 28, 2014. TDHCA staff was present. Anticipated outcome of the consultation is greater coordination of the state's resources and services to address homelessness.
71	Agency/Group/Organization	South East Texas Regional Planning Commission
	Agency/Group/Organization Type	Services-homeless Regional organization Planning organization Continuum of Care
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy Method of Distribution
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency participated in the TICH quarterly meeting on May 20, 2014. TDHCA staff was present. Anticipated outcome of the consultation is greater coordination of the state's resources and services to address homelessness.
72	Agency/Group/Organization	City of Amarillo
	Agency/Group/Organization Type	Other government - Local Continuum of Care

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy Method of Distribution
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency participated in the TICH quarterly meeting on May 20, 2014. TDHCA staff was present. Anticipated outcome of the consultation is greater coordination of the state's resources and services to address homelessness.
73	Agency/Group/Organization	Fort Bend Corps
	Agency/Group/Organization Type	Housing Services - Housing
	What section of the Plan was addressed by Consultation?	Lead-based Paint Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency participated in the TDHCA Environmental Clearance 2-day Workshop for Single Family Construction Projects on June 19-20, 2014, at Commons Learning Center (J.J. Pickle Research Campus), 10100 Burnet Road, Austin, TX. The anticipated outcome of the consultation was to accept input on community actions to address lead-based paint hazards, increased access to housing without lead-based paint hazards, and community actions planned to reduce lead-based paint hazards.
74	Agency/Group/Organization	Community Development Corporation of Brownsville
	Agency/Group/Organization Type	Housing Services - Housing CHDO Organizations Serving Colonias
	What section of the Plan was addressed by Consultation?	Lead-based Paint Strategy

	<p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Organization participated in the TDHCA Environmental Clearance 2-day Workshop for Single Family Construction Projects on June 19-20, 2014, at Commons Learning Center (J.J. Pickle Research Campus), 10100 Burnet Road, Austin, TX. The anticipated outcome of the consultation was to accept input on community actions to address lead-based paint hazards, increased access to housing without lead-based paint hazards, and community actions planned to reduce lead-based paint hazards. Organization also participated in the Colonia Self-Help Center Program Workshop hosted by TDHCA on August 6, 2014, in San Antonio, TX. TDHCA staff was present. The workshop provided training and program guidance to organizations serving colonias.</p>
75	<p>Agency/Group/Organization</p> <p>Agency/Group/Organization Type</p>	<p>Texas Health and Human Services Commission</p> <p>Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Services-Employment Service-Fair Housing Services - Victims Health Agency Child Welfare Agency Publicly Funded Institution/System of Care Other government - State Grantee Department Organizations Serving Colonias</p>
	<p>What section of the Plan was addressed by Consultation?</p>	<p>Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs HOPWA Strategy Economic Development Market Analysis Anti-poverty Strategy Method of Distribution</p>

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency participated in the TICH quarterly meetings on May 20, 2014 and July 28, 2014. TDHCA staff was present. Anticipated outcome of the consultation is greater coordination of the state's resources and services to address homelessness.
76	Agency/Group/Organization	Texas Department of Criminal Justice
	Agency/Group/Organization Type	Services - Housing Services-Elderly Persons Services-Persons with Disabilities Services-homeless Services-Education Services-Employment Service-Fair Housing Services - Victims Other government - State Organizations Serving Colonias
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency participated in the TICH quarterly meeting on July 28, 2014. TDHCA staff was present. Anticipated outcome of the consultation is greater coordination of the state's resources and services to address homelessness.
77	Agency/Group/Organization	Texas Department of Family and Protective Services
	Agency/Group/Organization Type	Services - Housing Services-Children Services-Persons with Disabilities Services-Victims of Domestic Violence Services-homeless Service-Fair Housing Services - Victims Child Welfare Agency Other government - State
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy Method of Distribution

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency participated in the TICH quarterly meeting on July 28, 2014. TDHCA staff was present. Anticipated outcome of the consultation is greater coordination of the state's resources and services to address homelessness.
78	Agency/Group/Organization	Texas Education Agency
	Agency/Group/Organization Type	Services-Children Services-Education Other government - State
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth Economic Development Market Analysis Anti-poverty Strategy Method of Distribution
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Agency participated in the TICH quarterly meeting on July 28, 2014. TDHCA staff was present. Anticipated outcome of the consultation is greater coordination of the state's resources and services to address homelessness.
79	Agency/Group/Organization	ARCIL, Inc.
	Agency/Group/Organization Type	Services-Persons with Disabilities Regional organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs Economic Development Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The organization attended the DAW on April 24, 2014. TDHCA maintains the DAW to provide ongoing guidance on how TDHCA's programs, including ESG and HOME, can most effectively serve persons with disabilities.
80	Agency/Group/Organization	Disability Rights Texas
	Agency/Group/Organization Type	Services - Housing Services-Elderly Persons Services-Persons with Disabilities Services-Health Services-Education Services-Employment Regional organization Planning organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs Economic Development Market Analysis

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Organization participated in the DAW on April 24, 2014. TDHCA maintains the DAW to provide ongoing guidance on how TDHCA's programs, including ESG and HOME, can most effectively serve persons with disabilities.
81	Agency/Group/Organization	Texas Department of Aging and Disability Services (DADS)
	Agency/Group/Organization Type	Services-Elderly Persons Services-Persons with Disabilities Other government - State
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Organization participated in the DAW on April 24, 2014. TDHCA maintains the DAW to provide ongoing guidance on how TDHCA's programs, including ESG and HOME, can most effectively serve persons with disabilities. The organization also participated in the TICH quarterly meetings on May 20, 2014 and July 28, 2014. TDHCA staff was present. Anticipated outcome of the consultation is greater coordination of the state's resources and services to address homelessness.
82	Agency/Group/Organization	TX Dept. of State Health Services
	Agency/Group/Organization Type	Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-homeless Services-Health Health Agency
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs Economic Development Market Analysis Anti-poverty Strategy Method of Distribution

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Organization participated in the DAW on April 24, 2014. TDHCA maintains the DAW to provide ongoing guidance on how TDHCA's programs, including ESG and HOME, can most effectively serve persons with disabilities. The organization also participated in the TICH quarterly meetings on May 20, 2014 and July 28, 2014. TDHCA staff was present. Anticipated outcome of the consultation is greater coordination of the state's resources and services to address homelessness.
83	Agency/Group/Organization	Inclusive Communities Project
	Agency/Group/Organization Type	Services - Housing Service-Fair Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Organization participated in an online discussion forum that sought input on housing and community development needs and market analysis for the State of Texas. The purpose of the discussion forum was to provide staff at TDHCA, TDA, and DSHS, with essential input as it is drafting the State of Texas 2015-2019 Consolidated Plan. The forum was available online from July 11, 2014 through July 31, 2014.
84	Agency/Group/Organization	Trans Pride Initiative
	Agency/Group/Organization Type	Services - Housing Services-homeless Services-Health Services-Education Services-Employment
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Organization participated in an online discussion forum that sought input on housing and community development needs and market analysis for the State of Texas. The purpose of the discussion forum was to provide staff at TDHCA, TDA, and DSHS, with essential input as it is drafting the State of Texas 2015-2019 Consolidated Plan. The forum was available online from July 11, 2014 through July 31, 2014.

85	Agency/Group/Organization	United Way for Greater Austin
	Agency/Group/Organization Type	Services-Children Services-Elderly Persons Services-Education Services-Employment Regional organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Organization participated in an online discussion forum that sought input on housing and community development needs and market analysis for the State of Texas. The purpose of the discussion forum was to provide staff at TDHCA, TDA, and DSHS, with essential input as it is drafting the State of Texas 2015-2019 Consolidated Plan. The forum was available online from July 11, 2014 through July 31, 2014.
86	Agency/Group/Organization	Panhandle Regional Planning Commission
	Agency/Group/Organization Type	Services-Elderly Persons Services-Employment Regional organization Planning organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Economic Development Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The organization provided public comment at the July 23, 2014 public hearing on the Consolidated Plan held in Austin at the William Travis Building. Comment was made on the CDBG program and the impact that proposed changes to the annual application process would have on rural communities. Public comment summary and response is provided as an attachment in Section AD-25. Representatives from TDHCA, TDA, and DSHS were present. The hearing gave the public an opportunity to provide comment on housing and community development needs, including priority non-housing community development needs, before the draft Plan has been completed.
87	Agency/Group/Organization	EFC Builders
	Agency/Group/Organization Type	Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Economic Development Market Analysis HOME Investment Partnerships Program Processes

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The organization provided public comment at the July 23, 2014 public hearing on the Consolidated Plan held in Austin at the William Travis Building. Comment was made on the CDBG program and the timing of reimbursement payments to contractors. Public comment summary and response is provided as an attachment in Section AD-25. Representatives from TDHCA, TDA, and DSHS were present. The hearing gave the public an opportunity to provide comment on housing and community development needs, including priority non-housing community development needs, before the draft Plan has been completed.
88	Agency/Group/Organization	City of Trinity
	Agency/Group/Organization Type	Housing Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Economic Development Market Analysis HOME Investment Partnerships Program Processes
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The organization provided public comment at the July 23, 2014 public hearing on the Consolidated Plan held in Austin at the William Travis Building. Comment was made on the HOME program and the HOME program Single-family Reservation System. Public comment summary and response is provided as an attachment in Section AD-25. Representatives from TDHCA, TDA, and DSHS were present. The hearing gave the public an opportunity to provide comment on housing and community development needs, including priority non-housing community development needs, before the draft Plan has been completed.
89	Agency/Group/Organization	Wolfe City
	Agency/Group/Organization Type	Housing Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Economic Development Market Analysis HOME Investment Partnerships Program Processes

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The organization provided public comment at the July 23, 2014 public hearing on the Consolidated Plan held in Austin at the William Travis Building. Comment was made on the HOME program and the HOME program Single-family Reservation System. Public comment summary and response is provided as an attachment in Section AD-25. Representatives from TDHCA, TDA, and DSHS were present. The hearing gave the public an opportunity to provide comment on housing and community development needs, including priority non-housing community development needs, before the draft Plan has been completed.
90	Agency/Group/Organization	San Patricio County
	Agency/Group/Organization Type	Housing Services - Housing Other government - County
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Economic Development Market Analysis Anti-poverty Strategy HOME Investment Partnerships Program Processes
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The organization provided public comment at the July 23, 2014 public hearing on the Consolidated Plan held in Austin at the William Travis Building. Comment was made on the HOME program and housing needs of income eligible San Patricio County residents. Public comment summary and response is provided as an attachment in Section AD-25. Representatives from TDHCA, TDA, and DSHS were present. The hearing gave the public an opportunity to provide comment on housing and community development needs, including priority non-housing community development needs, before the draft Plan has been completed.
91	Agency/Group/Organization	Community Resource Group
	Agency/Group/Organization Type	Services - Housing Regional organization Community Development Financial Institution Organizations Serving Colonias
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Colonias Set-aside Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Organization participated in the Colonia Self-Help Center Program Workshop hosted by TDHCA on August 6, 2014, in San Antonio, TX. TDHCA staff was present. The workshop provided training and program guidance to organizations serving colonias.

92	Agency/Group/Organization	Webb County Community Action Agency
	Agency/Group/Organization Type	Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Education Services-Employment Other government - County Regional organization Planning organization Organizations Serving Colonias
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Colonias Set-aside Strategy Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Organization participated in the Colonia Self-Help Center Program Workshop hosted by TDHCA on August 6, 2014, in San Antonio, TX. TDHCA staff was present. The workshop provided training and program guidance to organizations serving colonias.
93	Agency/Group/Organization	Proyecto Azteca
	Agency/Group/Organization Type	Housing Services - Housing Organizations Serving Colonias
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Colonias Set-aside Strategy Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Organization participated in the Colonia Self-Help Center Program Workshop hosted by TDHCA on August 6, 2014, in San Antonio, TX. TDHCA staff was present. The workshop provided training and program guidance to organizations serving colonias.

Identify any Agency Types not consulted and provide rationale for not consulting

Every required agency type was included in the consultations, as can be seen in the chart above and in a spreadsheet called “Process Chapter Consultation Chart Supplemental Information” included as an attachment in the Administration Chapter’s Grantee Unique Appendixes. The attachment is included because HUD’s online template for grantees, Integrated Disbursement & Information System “IDIS” had technical difficulties and provided data limitations in saving and responding to all of the consultations.

Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Texas Interagency Council for the Homeless	The TICH coordinates the state's resources and services to address homelessness. TICH is comprised of representatives from 11 state agencies. The TICH initiated a study in January 2011 and published the report entitled Pathways Home, which presents findings from this study. The Strategic Plan considers the Pathways Home statewide framework to help more of Texas' most vulnerable citizens enter and remain in safe housing.
Opening Doors	U.S. Interagency Council on Homelessness	TDHCA has plans for closer coordination with CoCs. Greater local control of ESG funds incorporates the priorities of Opening Doors.
2014-2015 Biennial Plan	Housing and Health Services Coordination Council (HHSCC's 2014-2015 Biennial Plan was helpful in determining the needs, availability, barriers, and successes of Service-Enriched Housing. http://www.tdhca.state.tx.us/hhsc/biennial-plans.htm According to HHSCC, "Service-Enriched Housing is defined as: integrated, affordable, and accessible housing that provides residents with the opportunity to receive on-site or off-site health-related and other services and supports that foster independence in living and decision-making for individuals with disabilities and persons who are elderly." Two special needs populations in the 2015-2019 State of Texas Consolidated Plan overlap with populations that may benefit from Service-Enriched Housing, including people with disabilities and persons who are elderly.

Table 3 – Other local / regional / federal planning efforts

Describe cooperation and coordination among the State and any units of general local government, in the implementation of the Consolidated Plan (91.315(I))

As described above, TDHCA, TDA, and DSHS met with various local governments in preparation for drafting of the Consolidated Plan in both formal and informal ways.

During preparation of the plan, TDA developed several program improvements proposed for the CDBG program. TDA hosted two informal webinars to inform stakeholders and solicit informal input on these changes. Many local governments responded to the proposal in writing, while others contacted staff to provide verbal feedback. As a result of the comments and concerns, the Commissioner of Agriculture determined that additional time was needed to consult with stakeholders prior to adopting program changes.

The CDBG program has for many years used a regional distribution of funds for its largest fund category, the Community Development Fund. This process includes formal public hearings every two years in each of the 24 Council of Government planning regions to determine local funding priorities. Although the proposed program changes were not implemented for the upcoming application cycle, many of the

Regional Review Committees discussed the proposal and the potential impacts for the future, providing valuable feedback to TDA.

Narrative (optional):

While not official public comment, the consultations resulted in several changes during the development of the draft Plan. Many consultations were received in writing and orally and, while it is not possible to include all changes to the draft Plan in this section, some prime examples follow. One consultation which resulted in a major change in the proposed CDBG Community Development Fund was opposition against an annual cycle. As a result of several organizations' input on the negative effects of the annual cycle, a biennial cycle was included instead.

During the TICH meeting, the Chair of the TICH (who is also the CEO of Cornerstone Assistance Network) and TICH representative for the Texas Department of Criminal Justice ("TDCJ"), spoke about the substandard housing they or their staff witnessed in and around Hondo and statewide. This valuable input shores up the need for housing rehabilitation. This input illustrates that, even though substandard housing affects the lowest percentage of residents in Texas relative to other housing needs, the local market dynamics may show a need for housing rehabilitation in specific neighborhoods. The importance of local input for rehabilitation is included in the Strategic Plan.

Several consultations mentioned the lack of shelters for homeless women or women who were victims of domestic violence. A resident from Henderson County, a Regional Partnership Specialist for HHSC, and the Director of Patient Education and Enrollment at Esperanza Health and Dental Centers all noted the need for shelters for homeless women. This need was included in the Market Assessment, and also allowed ESG to clarify its policy that ESG also funds shelters for women and that shelters that only serve men can also provide references and referrals for women seeking assistance.

Another example of consultations included in the drafting of the Plan is South Central Texas' 2-1-1 Information and Referral Service ("IRS"). The South Central Texas 2-1-1 IRS contributed many statistics from their 2013 data regarding the housing needs encountered in the greater Austin City area. The housing needs they reported virtually mirror the housing needs found in Texas as a whole, corroborating the statistics in the Needs Assessment Section 10. This not only helps incorporate local needs into the draft Plan, but also supports the statewide data analysis.

The Texas Juvenile Justice Department ("TJJD") also brought to light several challenges faced by youth aged 17-19 years who exit TJJD's facilities, which are included in the Needs Assessment. TJJD also suggested supportive housing options for youth who exit TJJD's facilities, which is included in the Market Analysis.

PR-15 Citizen Participation - 91.115, 91.300(c)

1. Summary of citizen participation process/Efforts made to broaden citizen participation

Summarize citizen participation process and how it impacted goal-setting

Comprehensive outreach was conducted to gather input on the draft Plan. The public hearing and consultations conducted before the creation of the draft Plan, as well as discussion of the participation of local, regional, and statewide institutions, CoCs, and other organizations affected by the Plan are listed in Process Section 10. The Plan, as adopted, substantial amendments, and the Consolidated Plan Annual Performance and Evaluation Report (“CAPER”) will be available to the public online at <http://www.tdhca.state.tx.us> and will have materials accessible to persons with disabilities, upon request.

Encouragement of Public Participation

To reach minorities and non-English speaking residents, the draft Plan outreach will follow TDHCA’s Language Access Plan. Also, the notices will be printed in Spanish and English, per Texas Government Code §2105. Spanish speaking staff will attend meetings in areas likely to have Spanish speakers, such as San Antonio and the Rio Grande Valley. Translators for other languages will be made available at public meetings, if requested.

The State encourages the involvement of individuals of low incomes and persons with disabilities in the allocation of funds and planning process through regular meetings, including community-based institutions, consumer workgroups, and councils listed in Strategic Plan Section 35. All hearing locations are accessible to all who choose to attend, and public hearings will be held at times for both working and non-working persons. Comments can be submitted either at a public hearing or in writing via mail, fax, or email.

The State notifies residents in areas where CDBG funds are proposed for use by distributing information on public hearings through the CDBG email list from TDA. Information related to the Plan and opportunities for feedback were provided through webinars and web discussions that allow participation by residents of rural areas without requiring travel to a central location. Regional public hearings held as part of the Regional Review Committee process also encourage participation by CDBG stakeholders.

Public hearings

The Draft Plan will have a 32-day public comment period from September 12, 2014, to October 13, 2014. TDHCA will hold at least four hearings across the state. Constituents are encouraged to provide input regarding all programs in writing or at one of the public hearings.

The public hearing schedule will be published in the *Texas Register* and on TDHCA's website at <http://www.tdhca.state.tx.us>, and will be advertised during various workgroups and committee meetings. During the public comment period, printed copies of the draft Plan will be available from TDHCA, and electronic copies will be available for download from TDHCA's website.

The affect of consultations on goal-setting was discussed in Process Section 10. Public comment received on the draft Plan will be addressed in the final Plan.

Criteria for Amendment to the Consolidated Plan

Substantial amendments will be considered if a new activity is developed for any of the funding sources or there is a change in method of distribution. If a substantial amendment is needed, reasonable notice by publication on TDHCA's website at <http://www.tdhca.state.tx.us> will be given, and comments will be received for no less than 30 days after notice is given. A public hearing will be optional.

Performance Report

The 2016 CAPER will analyze the results of the Plan. Due to the short 90-day turnaround time of the CAPER between the end of HUD's Program Year (1/31) and the due date, the public will be given reasonable notice by publication on TDHCA's website at <http://www.tdhca.state.tx.us>. Comment will be accepted for a minimum of 15 days. A public hearing will be optional.

Summarize citizen participation process and efforts made to broaden citizen participation in Colonias.

There are four ways in which TDHCA garners input from the public along the Texas-Mexico border, including input from colonia residents. First, TDHCA receives on-going input from colonia residents throughout the year. TDHCA has three Border Field Officers, located in border offices, who conduct presentations to promote programs, provide training, and assistance to colonia-based subrecipients, and perform community outreach. The Border Field Officers' contact information is public so that they can be contacted by colonia residents seeking information, referral, and/or assistance with problem solving.

Second, TDHCA receives direct input from colonia residents on SHC programming decisions from C-RAC. C-RAC membership includes two colonia residents (a primary and an alternate) from each county that has a SHC. The C-RAC members must reside in the actual colonias served by the SHC. C-RAC members are appointed by the local county government and the TDHCA Governing Board, and advise TDHCA on colonias residents' needs and the types of programs and activities that should be undertaken by the SHCs. The C-RAC also oversees the needs assessments conducted by the counties and reviews and makes recommendations on all SHC contract proposals before they are presented to TDHCA's Board of Directors.

Finally, TDHCA receives citizen participation from the border community at large when TDHCA updates its SHC Program rules biannually. The update process is initiated by soliciting comment from the public for critiques of the current rules and suggestions for changes. Also, every one to two years, TDHCA organizes and implements a workshop for eligible counties and their subgrantees to review rules, best practices, and exchange other program updates.

CDBG outreach efforts, including webinar information sessions, were made available to participants in colonia areas and throughout the state. Regional Review Committee public hearings in regions within 150 miles of the Texas-Mexico border included elected officials from counties serving colonia areas.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Electronic survey	CoCs, service providers	<p>On January 9, 2014, TDHCA released a survey to receive input from CoCs and services providers in the State of Texas on the allocation of funding, performance standards, and HMIS policies and procedures for its 2014 ESG funds. Comments were received from fourteen agencies representing six CoCs. The comments received will be considered in program planning for 2014. Such surveys will continue to be used for future program planning.</p>	<p>Commenters generally supported the TDHCA method of allocation and did not support the idea of limiting funding to applicants that do not receive direct funding from HUD. Emergency shelter, homelessness prevention, and rapid re-housing remain the highest needs among the commenters. Commenters generally support the idea of direct ESG funding to the CoCs but clearly require more information.</p>	<p>On the 2014 ESG survey, commenters requested that TDHCA align its reporting to mirror the HMIS. TDHCA reporting is based on HUD's requirements for the CAPER. As HUD moves to revise the CAPER to more closely reflect HMIS, TDHCA will follow.</p>	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
2	Public Hearing	Non-targeted/broad community	On July 23, 2014, TDHCA led a public hearing at 2:00pm at the William B. Travis Building, 1701 N. Congress, Room 1-100, Austin, TX, 78701. Twelve people were in attendance and six provided spoken and/or written comments.	Three speakers gave comment related only to the CDBG program, two speakers gave comment related only to the HOME program, and one speaker gave comment related to both the CDBG and HOME programs. Additionally, six letters and one email were received as written public comment. All written comments were made on the HOME program. A summary of public comment received is provided in the Attachments Chapter.	A summary of public comment received and reasoned responses are provided in the Attachment Chapter.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
3	Public Hearing	Non-targeted/broad community	On Tuesday, September 30, 2014, TDHCA led a public hearing at 6:00pm at the Omni San Antonio Hotel, Grand Ballroom C, 9821 Colonnade Boulevard, San Antonio, TX 78230. Eight people were in attendance and three provided spoken and/or written comments.	A summary of public comment received and reasoned responses are provided in the Attachment Chapter	A summary of public comment received and reasoned responses are provided in the Attachments Chapter.	http://www.tdhca.state.tx.us/events/index.jsp
4	Public Hearing	Minorities Non-English Speaking - Specify other language: Spanish	On Thursday, October 2, 2014, TDHCA led a public hearing at 11:00am at the Harlingen Public Library, Boggus Conference Room, 410 76 Drive, Harlingen, TX 78550. No one was in attendance and no spoken and/or written comments were provided.	A summary of public comment received and reasoned responses are provided in the Attachment Chapter	A summary of public comment received and reasoned responses are provided in the Attachments Chapter.	http://www.tdhca.state.tx.us/events/index.jsp

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
5	Public Hearing	Non-targeted/broad community	On Monday, October 6, 2014, TDHCA led a public hearing at 6:00pm at the Stephen F. Austin Building, Room 170, 1700 N. Congress Avenue, Austin, TX 78701. Four people were in attendance and two provided spoken and/or written comments.	A summary of public comment received and reasoned responses are provided in the Attachment Chapter	A summary of public comment received and reasoned responses are provided in the Attachments Chapter.	http://www.tdhca.state.tx.us/events/index.jsp
6	Public Hearing	Non-targeted/broad community	On Wednesday, October 8, 2014, TDHCA led a public hearing at 12:30pm at the Fort Worth Central Library, Chappell Meeting Room, 500 West Third Street, Fort Worth, TX 76102. Two people were in attendance and one provided spoken and/or written comments.	A summary of public comment received and reasoned responses are provided in the Attachment Chapter	A summary of public comment received and reasoned responses are provided in the Attachments Chapter.	http://www.tdhca.state.tx.us/events/index.jsp
7	Texas Register Posting	Non-targeted/broad community	TDHCA filed a notice in the Texas Register announcing the Public Comment Period and	A summary of public comment received and reasoned responses are	A summary of public comment received and reasoned responses are provided in the Attachments	http://www.sos.state.tx.us/texreg/archive/Septe

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
			<p>four Public Hearings on the Draft 2015-2019 State of Texas Consolidated Plan. The notice was filed on September 8, 2014 and was published in the September 19, 2014 Edition of the Texas Register. The notice announced that the State of Texas was holding a 32-day public comment period from Friday, September 12, 2014 through 6:00 p.m. Central on Monday, October 13, 2014, to obtain public comment on of the Draft 2015-2019 State of Texas Consolidated Plan. Comments were encouraged on the Plan in written form or oral testimony at the public hearings. Written comments concerning the Plan could be submitted by</p>	<p>provided in the Attachment Chapter.</p>	<p>Chapter.</p>	<p>mber192014/In%20Addition/In%20Addition.html#189</p>

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
			<p>mail to the Texas Department of Housing and Community Affairs, Housing Resource Center, P.O. Box 13941, Austin, TX 78711-3941, by email to info@tdhca.state.tx.us, or by fax to (512) 475-0070. The deadline to accept comments was Monday, October 13, 2014, 6:00 p.m. Central Time.</p>			

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
8	Internet Outreach	Non-targeted/broad community	To broaden citizen participation, TDHCA created a webpage to post information on the 2015-2019 State of Texas Consolidated Plan, including the Draft Plan, public hearing information, and submitting public comment. The unique URL of the webpage was shared widely by listserv emails and through TDHCA's Twitter and Facebook accounts. During the public comment period (September 12, 2014 through October 13, 2014). Twenty-eight emails were received during the public comment period.	A summary of public comment received and reasoned responses are provided in the Attachments Chapter.	A summary of public comment received and reasoned responses are provided in the Attachments Chapter.	http://www.tdhca.state.tx.us/housing-center/consolidated-plan-2015-2019.htm

Table 4 – Citizen Participation Outreach

Needs Assessment

NA-05 Overview

Needs Assessment Overview

The data analysis in this Needs Assessment will help shape the policies throughout this Consolidated Plan. The Needs Assessment refers to the Texas Department of Housing and Community Affairs' ("TDHCA") 13 Uniform State Service Regions. These regions are useful in discussing different parts of the State.

Needs Assessment Section 10 considers the characteristics of different family types and certain special needs populations. Single-person households more often have low incomes and consist of elderly persons than other household types. People with disabilities typically have lower incomes than other household types and require housing with certain specifications, such as physical accessibility. Victims of family violence are often women or young girls. Families at risk of homelessness typically have low incomes and strained social networks. They may already be living with a friend or relative and often have low educational attainment, which often corresponds with low paying jobs and little savings. Single adults who are at risk of homelessness or formerly homeless may have had a history of mental illness or substance use disorder.

Needs Assessment Section 10 also reveals that the most common housing problems are cost burden and severe cost burden, especially for households with incomes between 0-30% of the area median income ("AMI"). In most cases, renters experienced a higher rate of housing problems than homeowners. The exception was for severe cost burden in which homeowners experienced a greater rate of burden in the >30-100% AMI categories. This may be because households are more willing to spend a greater amount of their income to purchase a home than rent.

Needs Assessment Section 15 shows disproportionate housing problems based on race, which is described in the U.S. Department of Housing and Urban Development's ("HUD") eCon Planning Suite Guide as a race having a difference of more than 10% than the jurisdiction as a whole. White, Black/African American, and Hispanic populations had differences less than 10% compared to the State. Asian and Pacific Islander populations had a difference of greater than 10% in some income categories, but their population samples were relatively small, resulting in high margins of errors. The same trend was also seen in Needs Assessment Section 20 and Section 25 describing disproportionate severe housing problems and housing cost burden. As discussed in Needs Assessment Sections 15 and 25, the level of disproportionate need depends on the size of the area examined. The maps for these sections compare percentages by county instead of the State, which reveals more areas of disproportionate need than the State as a whole.

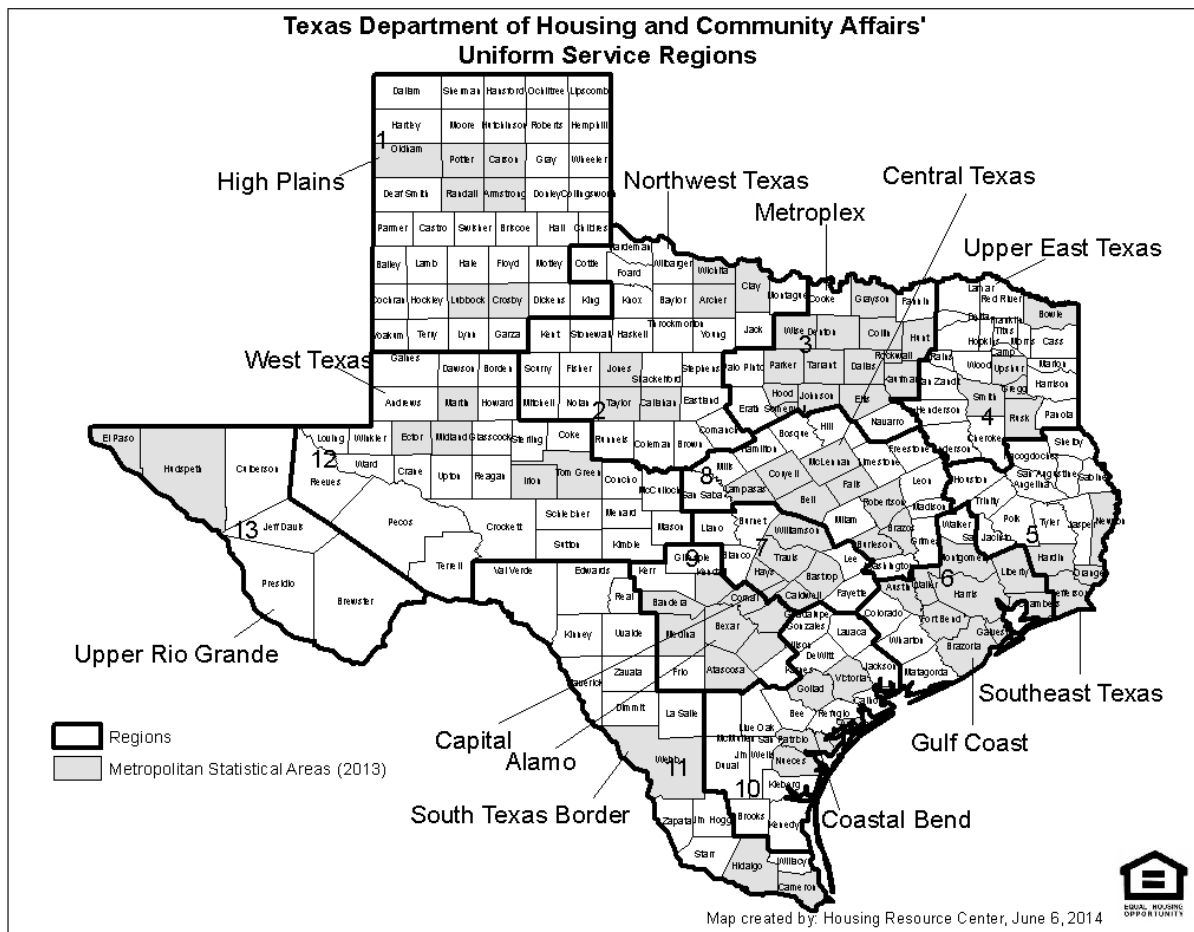
Needs Assessment Section 30 addressed some special needs populations, such as colonia residents with high levels of poverty along the Texas-Mexico border. The *State's Plan for Fair Housing Choice: 2013 Analysis of Impediments* was also included in the disproportionate analysis.

Needs Assessment Section 40 discusses one of Texas' special needs populations in depth: households experiencing homelessness. Along with hard numbers of households experiencing homelessness, this section includes discussion on a greater likelihood that minorities are economically disadvantaged, as

well as homeless. Finally, the difference between unsheltered and sheltered households experiencing homelessness is explored.

Needs Assessment Section 45 has detailed information on persons living with HIV/AIDS ("PLWH"), as well as elderly and frail elderly, farmworkers, persons with alcohol and substance use disorders, persons with disabilities, public housing residents, veterans, victims of domestic violence, and youth aging out of foster care.

Finally, Needs Assessment Section 50 ends with non-housing community needs and discusses public facilities, public improvements and public services, as well as colonias.



Map 1

NA-10 Housing Needs Assessment - 24 CFR 91.305 (a,b,c)

Summary of Housing Needs

Needs Assessment Section 10 discusses housing needs of single persons, elderly persons (e.g. over 62 years as shown in the data below), renter and owners, people with disabilities, victims of domestic violence, formerly-homeless households, and households at risk of homelessness. Household groups are divided into income categories with different ranges of the household area median incomes.

Demographics	Base Year: 2000	Most Recent Year: 2010	% Change
Population	20,851,820	24,311,891	17%
Households	7,393,354	8,539,206	15%
Median Income	\$39,927.00	\$49,646.00	24%

Table 1 - Housing Needs Assessment Demographics

Data Source: 2000 Census (Base Year), 2006-2010 ACS (Most Recent Year)

Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80- 100% HAMFI	>100% HAMFI
Total Households *	1,043,725	1,013,705	1,410,615	837,405	4,233,760
Small Family Households *	365,395	382,680	580,815	367,465	2,366,735
Large Family Households *	114,310	138,170	193,870	111,715	426,390
Household contains at least one person 62-74 years of age	153,855	174,535	234,950	137,195	664,475
Household contains at least one person age 75 or older	123,420	147,320	157,545	73,690	252,750
Households with one or more children 6 years old or younger *	261,020	258,540	325,905	175,755	589,715

* the highest income category for these family types is >80% HAMFI

Table 2 - Total Households Table

Data Source: 2006-2010 CHAS

Housing Needs Summary Tables

1. Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	17,945	10,635	10,360	4,855	43,795	8,760	6,835	6,755	3,905	26,255
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	20,535	16,435	12,335	4,420	53,725	5,125	6,220	9,695	4,255	25,295
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	43,735	42,835	36,445	15,260	138,275	14,770	23,490	37,625	18,315	94,200
Housing cost burden greater than 50% of income (and none of the above problems)	384,300	150,570	31,865	3,060	569,795	195,560	138,370	97,805	27,600	459,335
Housing cost burden greater than 30% of income (and none of the above problems)	62,950	220,595	228,925	44,875	557,345	61,215	116,355	212,120	124,695	514,385
Zero/negative Income (and none of the above problems)	62,995	0	0	0	62,995	34,400	0	0	0	34,400

Table 3 – Housing Problems Table

Data Source: 2006-2010 CHAS

2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	466,520	220,475	91,000	27,600	805,595	224,215	174,910	151,880	54,075	605,080
Having none of four housing problems	142,395	314,055	540,180	290,885	1,287,515	113,200	304,260	627,555	464,845	1,509,860
Household has negative income, but none of the other housing problems	62,995	0	0	0	62,995	34,400	0	0	0	34,400

Table 4 – Housing Problems 2

Data Source: 2006-2010 CHAS

3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	207,725	182,970	116,775	507,470	85,195	100,775	155,195	341,165
Large Related	61,560	46,790	19,480	127,830	32,585	46,430	54,760	133,775
Elderly	67,480	53,330	31,130	151,940	108,100	91,180	66,960	266,240
Other	178,220	134,655	106,100	418,975	50,780	34,755	48,085	133,620
Total need by income	514,985	417,745	273,485	1,206,215	276,660	273,140	325,000	874,800

Table 5 – Cost Burden > 30%

Data Source: 2006-2010 CHAS

4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	176,820	63,825	12,375	253,020	70,670	60,095	48,125	178,890
Large Related	48,340	12,280	1,130	61,750	24,800	23,065	10,435	58,300
Elderly	48,285	26,720	8,590	83,595	71,395	39,410	22,175	132,980
Other	161,190	56,965	11,700	229,855	42,495	23,000	19,190	84,685
Total need by income	434,635	159,790	33,795	628,220	209,360	145,570	99,925	454,855

Table 6 – Cost Burden > 50%

Data Source: 2006-2010 CHAS

5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	58,280	50,655	39,285	14,955	163,175	15,930	22,725	31,475	13,430	83,560
Multiple, unrelated family households	6,640	8,355	8,475	3,975	27,445	5,120	7,590	16,525	9,295	38,530
Other, non-family households	1,735	1,400	1,850	1,090	6,075	100	210	165	70	545
Total need by income	66,655	60,410	49,610	20,020	196,695	21,150	30,525	48,165	22,795	122,635

Table 7 – Crowding Information – 1/2

Data Source: 2006-2010 CHAS

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present	Not available	Not available	Not available	Not available	Not available	Not available	Not available	Not available

Table 8 – Crowding Information – 2/2

Data Source Comments:

Describe the number and type of single person households in need of housing assistance.

The tables in the Housing Needs Assessment do not include one-person households, since the “small family” category in the Comprehensive Housing Affordability Strategy data includes two persons. Independently from the tables above in Needs Assessment Section 10, according to the 2008-2012 American Community Survey Table B11016, there were 2,182,605 one-person households in Texas. This was approximately 24.9% of all households in Texas, up from 23.6% in 2000 (2000 Census Table H013). This increase is consistent with the national trend of an increasing percentage of one-person households since the 1970s (Vespa, Lewis, Kreider, 2013). However, the percentage of Texas one-person households is lower than the percentage of one-person households in the United States, 27.5%. Even with Texas’ lower percentage compared to the nation, one-person households are a sizable minority, with almost one in four households consisting of a one-person household.

The needs of one-person households are determined by their composition. Almost one-third of one-person households consist of people over age 65. Only 18.3% of households with two or more persons had one or more person aged 65 and over (2008-2012 American Community Survey Table B11007). One-person households are more likely than two-or-more person households to have a person over 65 years of age. The State’s Phase 2 Analysis of Impediments to Fair Housing Choice (“AI”) identified the strongest growth of households aged 55-65 in rural areas and demonstrated that resident households with ages between 55-65 were the fastest growing age group in Texas as a whole across races and ethnicities. This means that one-person households will increasingly have many of the issues that confront households with elderly or frail elderly, such as a need for disability services, as discussed in Needs Assessment 45. The Phase 2 AI released demographic information by the 13 state service regions, including discussions of data for households with elderly persons and persons with disabilities.

The median income of one-person households in Texas was approximately \$29,707 less than two-person households (2008-2012 American Community Survey Table B19019). However, only 58% of one-person households were workers compared to 74.5% of two-person households that contained one worker. The lower percentage of workers in one-person households could be a result of the higher percentage of one-person households with persons over 65, as discussed in the previous paragraph. The persons over 65 could be living on a fixed retirement, benefit or disability income, contributing to the lower median income. Finally, 37.4% of two-person households had two workers and two incomes. For households with only one member, there is only one potential worker, which contributes to the lower median income than two-person households with two workers. It is apparent that, for a variety of reasons, one-person households have lower incomes than two-person households.

Most one-person households only need access to an efficiency or one-bedroom home, which are typically lower in cost than larger homes. For example, in 2014 housing prices in Killeen-Temple-Fort Hood (which has the State’s median fair market rents for Metropolitan Statistical Areas) rents are \$537 for an efficiency and \$551 for a one bedroom, compared to a two bedroom at \$734. However, the availability of efficiencies and one-bedroom units is only 13% of the current housing stock, according to the table under the Market Analysis Section 10, Number of Housing Units. Also, the competition for smaller units may include households with more than one-person. This means that not every one-person household will be able to live in an efficiency or one-bedroom unit. Because of the lack of and competition for efficiencies and one-bedroom units, and because of lower incomes than other household types, single-family households may experience cost burden.

Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.

According to the 2008-2012 American Community Survey Table S1810, the non-institutionalized civilian population shows that there were 24,723,454 Texans and 2,845,868 of them were persons with a disability, or about 11.5% of the population. Of those, 1,532,659 persons with disabilities were between 18-64 years old. However, the age range of 65 years and older had the highest percent of persons with a disability, at 40.5%. The most common type of disability was an ambulatory disability: approximately 1,525,821 persons had an ambulatory difficulty, which was about 6% of the total population. The second most common type of disability was cognitive difficulty, which accounted for 4% of the total population. A cognitive difficulty is defined by the question asked in 2008: "Because of a physical, mental, or emotional condition, does this person have serious difficulty concentrating, remembering, or making decisions?"

The Phase 2 AI found that persons with disabilities are typically more vulnerable to housing discrimination than others, often due to a lack of knowledge about reasonable accommodation provisions in fair housing laws. Additionally, persons with disabilities face challenges finding housing that is affordable, accessible, and located near transit and supportive services. A 2009 survey cited in the Phase 2 AI found that 14% of Texans age 60 and older reported needing substantial modifications to their living units, with 38% unsure of how to access help to make these necessary improvements.

According to the 2008-2012 American Community Survey Table S1811, approximately 21.7% of people with disabilities were under the poverty line in Texas, compared to 14.8% of people without disabilities. Approximately 2,929,721 had an ambulatory, vision, or hearing difficulty (2008-2012 American Community Survey, Table S1810), all of which could be mitigated by accessibility features in housing.

Regarding victims of family violence, the Texas Department of Public Safety's Crime in Texas report shows 198,504 victims of family violence in Texas in 2012. However, the number of victims may include some double counting, since the data is based on the number of domestic violence incidents, some of which may be from the same victim. When the gender and ethnicity of the victim was known, 73% were female and 36% were Hispanic (p. 34-65).

The Annual Victimization Survey for Texas found that 18.2% of respondents cited stalking as a problem: 128 victims with 453 stalking incidents over 24 months. More than one half of the victims reported knowing the person who stalked them before the stalking started. While it can be difficult identifying stalking patterns, intervention may be necessary to prevent escalating violence (Kercher and Johnson, n.d., p. 3, 12, 15)

The Texas Department of Public Safety's Crime in Texas report also states that there were 18,760 victims of sexual assault in Texas in 2012. A majority of the victims were female at 87.3%. Approximately 7.39% of victims of sexual assault were in a romantic dating relationship with the assaulter. The most common location for the assault was in the home, at 75.3% (p. 49-51). The Texas Council on Family Violence found that, of the 114 women killed by their intimate male partner in 2012, the most common age range was 30 to 39 years old and 74% were killed at home, also making home a potentially dangerous place for victims of family violence (p. 5). The age group of 10 to 14 years had the highest incidents of sexual assault with approximately 5,400 victims. These factors may attribute to homelessness among girls aged 10 to 14 years and among women who are fleeing a home life of sexual assault.

What are the most common housing problems?

Comparing Table 6, Number of Households, to Table 7, Households with Housing Problems, the most common housing problem is cost burden. Of total households at or under 100% AMI, 25% experience cost burden and 24% experience severe cost burden. There is a unique relationship between income category, cost burden, and severe cost burden. For households with incomes between 0-30% AMI, the incidences of non-severe cost burden is 12%, but severe cost burden rises dramatically to 56%. The low rate of non-severe cost burden is unexpected, but offset by the increase in severe cost burden. For households in the >30-50% AMI category, non-severe cost burden goes up to 33% and severe cost burden goes down to 29%; for households in the >50-80% AMI category, non-severe cost burden is higher than the state average at 31% but severe cost goes down to 9%. Finally, for households in the >80-100% AMI category, non-severe cost burden falls to 20% and severe cost burden drops to its lowest level at 4%. This shows that the higher the income, the less likely a household is going to be severely cost burdened or non-severely cost burdened.

The other housing problems included in Table 7, Households with Housing Problems, are less common. Overcrowding affects 5% of households at or under 100% AMI, and severe overcrowding affects 2%. Substandard housing is the least common housing problem with only 2% of all households at or under 100% experiencing this problem.

One consultation on the 2015-2019 State of Texas Consolidated Plan with the South Central Texas 2-1-1 for Greater Austin corroborated these trends. In 2013, the most common request for housing-related services in and around Austin City was housing payment assistance, at 49% of all housing-related needs in 2013. The second highest housing-related service requests at 25% was a list of low-cost housing. This made 74% of all housing-related service requests related to cost of housing. Of the remaining housing-related requests, 17% were related to homeless issues, including shelters, and 3% were related to home maintenance or minor repair services. The requests for housing-related services in the Austin area approximately mirror the percentages of the needs reflected in the State statistics.

Analyzing the Table 7, Households with Housing Problems, compared with the Table 8, Housing Problems 2, shows that many homeowner income categories had higher percentages of severe cost burden than renter income categories, but this trend was not consistent for non-severe cost burden. In three out of four income categories (>30-50%, >50-80%, and >80-100% AMI), homeowners experienced severe cost burden from 1 to 7% higher than renters. Renters in the 0-30% AMI category experienced a 5% higher rate of severe cost burden than homeowners. However, in two out of four income categories (>30-50% and >50-80% AMI), renters experienced non-severe cost burden from 9-17% higher than homeowners. In the other two income categories (0-30% AMI and >80-100% AMI), homeowners experienced non-severe cost burden from 7-10% higher than renters.

While homeowners sometimes had higher percentages of severe cost burden and non-severe cost burden, renters had the highest percentage difference compared to homeowners: 41% of renters in the >30-50% AMI category had cost burden compared to 24% of homeowners in the same income category. This 17% difference demonstrates that renters in this income category experienced a much more intense increase in cost burden than homeowners.

For the other housing problems, renters experienced a higher percentage of severe overcrowding, overcrowding, and substandard housing than homeowners in every income category. The rate of severe

overcrowding was 1-3% higher for renters across income categories; overcrowding was about 1-2% higher for renters across AMI categories; and substandard housing was 1-2% higher for renters.

Are any populations/household types more affected than others by these problems?

Housing problems fell hardest on households with 0-30% AMI. When analyzing Table 7, Housing Problems, and Table 8, Housing Problems 2, 79% of renters and 77% of homeowners in the 0-30% AMI category had a housing problem. Higher income resulted in a lower rate of housing problems. Approximately 66% of renters with >30-50% AMI and 61% of homeowners with >30-50% AMI had a housing problem; 48% of renters with >50-80% AMI and 47% of homeowners with >50-80% AMI had a housing problem; and 23% of renters with >80-100% AMI and 34% of homeowners with >80-100% AMI had a housing problem. The difference between renters and owners flip flopped at >80-100% AMI: a greater percentage of homeowners had housing problems than renters. Cost burden caused the switch: 24% of homeowners had cost burden compared to 14% of renters in this income category. This may be a result of homeowners taking on higher costs to enter the housing market.

Table 9, Cost Burden >30%, shows that cost burden was higher in the 0-30% AMI category for renters, but generally higher in the >50-80% AMI category for owners, with one exception. Of renters with cost burden in the 0-30% AMI category, approximately 41% were small related families, 48% were large related families, 44% were elderly families, and 43% were other types of families. Of renters with cost burden with incomes from 0-80% AMI, 42% were small related families, 11% were large related families, 13% were elderly families, and 35% were other types of families. Small families made up the biggest percent of renters with cost burden at 0-80% AMI.

For owners, cost burden was concentrated in the >50-80% AMI category except for elderly households, which was concentrated in the 0-30% AMI category. While 41-45% of homeowners from the other family types with cost burden were in the >50-80% AMI category, 41% of elderly homeowners with cost burden were in the 0-30% AMI category. This shows that there was a higher percentage of lower income elderly households with cost burden than other families. Of owners with cost burden with incomes from 0-80% AMI, 39% were small related families, 15% were large related families, 30% were elderly families, and 15% were other types of families. The biggest percentage of owners with cost burden with 0-80% AMI was small families, followed by elderly families.

Analyzing Table 10, severe cost burden was concentrated in the 0-30% AMI category for renters. Approximately 70% of small related families, 78% of large related families, and 70% of other types of families who are renters with severe cost burden had incomes at the 0-30% AMI category. Of renters with severe cost burden and 0-80% AMI, 40% were small related families, 10% were large related families, 13% were elderly families, and 37% were other types of families. For owners, severe cost burden was again concentrated in the 0-30% AMI category, but less than for renters. Approximately 46% of homeowners with cost burden had incomes in the 0-30% AMI category. Of owners with severe cost burden and 0-80% AMI, 39% were small related families, 13% were large related families, 29% were elderly families, and 19% were other types of families. Elderly families had the largest shift between renters and owners, at 16% higher for owners with severe cost burden. The highest percentage of populations with severe cost burden and 0-80% AMI was small families.

Like previous trends, the rate of overcrowding lowered dramatically in the >80-100% AMI category, dropping between 13 and 27% compared to the rates of overcrowding in the other income levels for renters, and dropping between 19 and 26% lower than the rates of overcrowding for owners.

Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance

Title 24 Code of Federal Regulations ("CFR") §91.5(1) states that an individual or family who is at risk of homelessness has income below 30% area median family income, do not have sufficient resources or support networks, and have experienced housing instability (i.e., due to economic hardship has moved two or more times within the previous 60 days, is living in the home of another household, lives at a motel or hotel, etc).

Individuals or families with extremely low incomes (30% or below area median income) are often service sector workers, including those who earn minimum wage. Of low-income workers, the average age is 35 years old. Twenty-five percent of low-income workers have children (National Low Income Housing Coalition, 2014, p 6).

Vulnerability factors for homelessness include difficulty obtaining a well-paying job due to factors such as low educational attainment, which in turn often result in low savings levels. Individuals or families at risk of homelessness are also often straining the willingness of their social networks to provide housing supports over an extended period, such as living with family or friends over an extended period.

Considering the cost and prevalence, as well as the direct relationship between housing and domestic violence, a majority of homeless women are, or have also been, victims of domestic violence. Several public comments requested the inclusion of the United States Interagency Council on the Homeless' statistic that 80% of families experiencing homelessness previously experienced domestic violence (2013b). As such, it is recognized that domestic violence is one of the main factors of homelessness or being at-risk of homelessness for families.

Finally, homeless families are often headed by single women who have an average of two children. The need for childcare can increase household expenses and make it more difficult to find stable employment (Buckner, 2014, pp. 11-15). Helping these populations includes both service assistance for the parent or guardian and the children, as well as homeless prevention assistance, such as short-term rental assistance, deposits, etc. For families that are homeless as a result of domestic violence, one study found that the main priority of domestic violence victims entering shelters was "safety for myself" (80%), followed by "finding housing I can afford" (85%) (National Network to End Domestic Violence, 2014). For this population, providing homelessness prevention with an emphasis on safety would be a priority.

Formerly homeless individuals and families, such as those moving out of shelters or rapidly rehoused, may continue to struggle with issues of unemployment or underemployment, lack of education, and lack of reliable transportation (Costa Nunez & Adams, 2014, pp. 223-224). For single homeless adults, the issues that may strain their support networks can be mental illness or substance use disorders (Buckner,

2014, p. 11). Therefore, needs for these populations would include ongoing affordable housing assistance, employment support services, and other coordinated health and human service supports.

If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:

The state does not have established estimates of the number of persons or households in the various at-risk populations. The Texas Interagency Council for the Homeless ("TICH") is an organization charged with coordination of Texas' resources and services to address homelessness. A primary objective of this organization is to refine and promote a definition of "at risk" of homelessness. TICH adopts a definition from the Homeless Emergency Assistance and Rapid Transition to Housing ("HEARTH") Act, which guides policy for HUD-funded homelessness assistance programs in Texas. The HEARTH Act definition recognizes that no single characteristic or risk factor reliably predicts an individual's likelihood of falling into homelessness. For instance, discharge from a prison facility may place an individual at a higher risk of homelessness, and a prison record may act as a barrier to employment and stable housing. However, barriers do not alone predict episodes of homelessness (Texas Interagency Council for the Homeless, 2012).

The definition in Section 401 of the Hearth Act defines At Risk of Homelessness as follows:

(1) AT RISK OF HOMELESSNESS.—The term 'at risk of homelessness' means, with respect to an individual or family, that the individual or family—

(A) has income below 30 percent of median income for the geographic area;

(B) has insufficient resources immediately available to attain housing stability; and

(C)(i) has moved frequently because of economic reasons;

(ii) is living in the home of another because of economic hardship;

(iii) has been notified that their right to occupy their current housing or living situation will be terminated;

(iv) lives in a hotel or motel;

(v) lives in severely overcrowded housing;

(vi) is exiting an institution; or

(vii) otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness.

Such term includes all families with children and youth defined as homeless under other Federal statutes.

Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness

Housing characteristics that have been linked with instability not only include housing problems as listed in this section, but also areas with high rates of unemployment, reduction in federal benefits and state subsidies for housing, areas with high rates of foreclosure, and the influx of consumers looking for affordable housing from markets already under-resourced to meet demand (Cowan, 2014, p. 38).

According to the National Low Income Housing Coalition, the lack of decent housing affordable to low-income households has remained a pervasive national issue for over 25 years, affecting every single community across the United States. Low-income, unassisted households often face housing instability, threats of eviction, poor housing conditions, and great risk of homelessness (National Low Income Housing Coalition, 2014).

Domestic violence contributes to homelessness. When a woman decides to leave an abusive relationship, she often has nowhere to go. This is particularly true of women with few resources. Lack of affordable housing and long waiting lists for assisted housing mean that many women and their children are forced to choose between abuse at home and life on the streets. Approximately 63% of homeless women have experienced domestic violence by an intimate partner in their adult lives (National Network to End Domestic Violence, 2014). Several public comments asked the State to include statistics released by the 2013 National Census of Domestic Violence Services which showed that Texas emergency shelters or transitional housing provided by local domestic violence programs served 5,923 victims of domestic violence in one day. On this day, 1,311 Texas survivor's request for services went unmet, 506 of which were for housing (2013).

Finally, it can be difficult for people who have been in institutions, such as nursing homes or Intermediate Care Facilities for Individuals with Intellectual Disabilities, to transition back to the community. First, persons exiting institutions face many more choices outside the institution than they did in the institution. Without pre-transition services, persons exiting institutions could experience relapse events triggering substance abuse or a psychiatric crisis (Stoner and Gold, 2012, p 91). After stability in treatment, the Housing and Health Services Coordination Council ("HHSCC") 2014-2015 Biennial Plan states that "Of all the barriers that nursing home residents encounter in returning to the community, lack of housing is the most common and difficult to address" (2014, p. 16). If persons who are trying to exit institutions do not have the necessary supports, these persons may not be able to move out of the institution or may have housing instability if they attempt to leave the institution.

Also, one consultation with a Regional Partnership Specialist with the Health and Human Services Commission ("HHSC") noted that low wages do not meet household expenses and high unemployment can lead to homelessness. In Smith County (Region 4), the consultant stated that many families are "doubled-up" as a result of these factors. In addition, the consultant noted that there are not enough beds in behavioral health treatment facilities and that the lack of space in treatment facilities can lead to relapses in mental health or addiction recovery, resulting in homelessness.

Discussion

While the trends within Texas help to shape housing policy, it is also helpful to compare Texas to the nation to see where Texas' needs are unique. Texas had a greater percentage of households with people

under 18 and fewer households with persons over 65 than the US as a whole. Households with people under 18 make up 39% of Texas, compared to 33% for the nation. Households with persons over 65 made up 21% percent of the Texas population, while this population made up 25% of the population for the nation (2008-2012 American Community Survey, Table DP02). Texans may have more of a need for family housing than the rest of the nation. Indeed, the analysis above shows that small related families made up the highest percentages of households with housing problems.

Texas had a slightly lower percent of the civilian, non-institutionalized population with disabilities than the rest of the nation. Texas had 11.5% and the nation had 12.0% (2008-2012 American Community Survey Table DP02). However, the difference was marginal enough as to make no significant difference in terms of policy.

While median income varies around the country, poverty is a set line. The poverty rate for Texas was 17% which was the 11th highest rate in the country (2008-2012 American Community Survey Table S1701). The high rates of poverty along the Texas-Mexico border, as will be discussed in Needs Assessment Section 30, significantly contribute to this high rate statewide.

One other need not addressed by the data above is the need for housing education and counseling to address conflicts and complaints. The consultation with the South Central Texas 2-1-1 for Greater Austin found that in 2013, 2% of the recorded needs for housing-related services were for housing complaints and advocacy. Of the 349 requests for housing complaints and advocacy, 79% were for landlord/tenant dispute resolution.

The analysis in this section shows overwhelmingly that cost burden is the greatest housing problem, especially for the lower-income persons. The analysis above also shows that different household types have different needs. For example, single-person households may be best suited to efficiencies and one-bedroom apartments for space and cost reasons. The needs of people with disabilities, people experiencing or at risk of homelessness and victims of domestic violence will also be discussed as a special need in Needs Assessment Section 30.

NA-15 Disproportionately Greater Need: Housing Problems - 91.305 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

By using the American Community Survey data from 2008-2012, it is possible to analyze population trends compared to the nation as a whole and its implication for housing need.

- Texas had approximately 25,208,897 people, which was about 8.2 percent of the US population (Table S0101).
- Texas mirrored the US closely in terms of percentages of races in the population. Texas had 74% of its population as White Alone and the US had 74%. The percentage differences in population between Texas and the US varied less than 1% for Black or African American Alone, American Indian or Alaskan Native Alone, Asian Alone, Native Hawaiian, and Other Pacific Island Alone, and Two or More Races. For Some Other Race Alone, Texas' population was 7% and the US' population was 5% (Table B02001). This 2% difference could be the result of the Hispanic population including their ethnicity with their race (U.S. Census Bureau, Population Estimates Program, n.d.).
- The percentage of Hispanics was 22% higher in Texas than the U.S.; Texas had 38% of its people identify as Hispanic, while the U.S. had 16% (Table B03002).

Expected housing demand is linked to the demographic makeup of Texas. The current racial and ethnic makeup is significant because of substantial differences in income levels of different races and ethnicities. According to the 2008-2012 American Community Survey, the number of people in poverty varied dramatically by race and ethnicity. In Texas, the White (non-Hispanic) population had a poverty rate of 9%; the Black or African American population had a poverty rate of 24%; the Hispanic population had a poverty rate of 26%; and the Asian population had a poverty rate of 12% (Table 17001). Lower incomes often lead to greater housing challenges.

Poverty rates were analyzed alongside assisted housing data by demographic populations in the Phase 2 AI. The AI examined disproportionate uses of assisted housing programs by ethnic and racial groups, revealing both underserved and highly represented populations taking part in assisted housing programs. Overall, African Americans were found to utilize assisted housing programs at higher rates than other populations, while Hispanic Americans were generally underrepresented. Housing choices for persons in poverty were examined for disparities in stakeholder surveys, which revealed a disproportionate impact on protected classes based on a lack of quality housing stock and neighborhood amenities, resources, and opportunities in low-income areas.

The tables below from the Comprehensive Housing Affordability Strategy data expand on the correlation between race and housing need.

0%-30% of Area Median Income

Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	828,416	136,172	90,955
White	297,673	53,929	38,162
Black / African American	161,529	27,981	17,654
Asian	20,584	2,340	5,722
American Indian, Alaska Native	3,468	515	483
Pacific Islander	449	0	64
Hispanic	335,501	50,044	27,949

Table 9 - Disproportionally Greater Need 0 - 30% AMI

Data Source: 2006-2010 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than one person per room,
4. Cost Burden greater than 30%

30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	725,536	291,376	0
White	267,446	130,931	0
Black / African American	111,283	35,719	0
Asian	19,188	4,019	0
American Indian, Alaska Native	2,320	1,073	0
Pacific Islander	443	114	0
Hispanic	316,990	116,946	0

Table 10 - Disproportionally Greater Need 30 - 50% AMI

Data Source: 2006-2010 CHAS

50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	644,999	756,874	0
White	280,509	361,849	0
Black / African American	92,335	94,648	0
Asian	19,806	15,061	0
American Indian, Alaska Native	2,086	2,519	0
Pacific Islander	609	429	0
Hispanic	242,252	273,934	0

Table 11 - Disproportionally Greater Need 50 - 80% AMI

Data Source: 2006-2010 CHAS

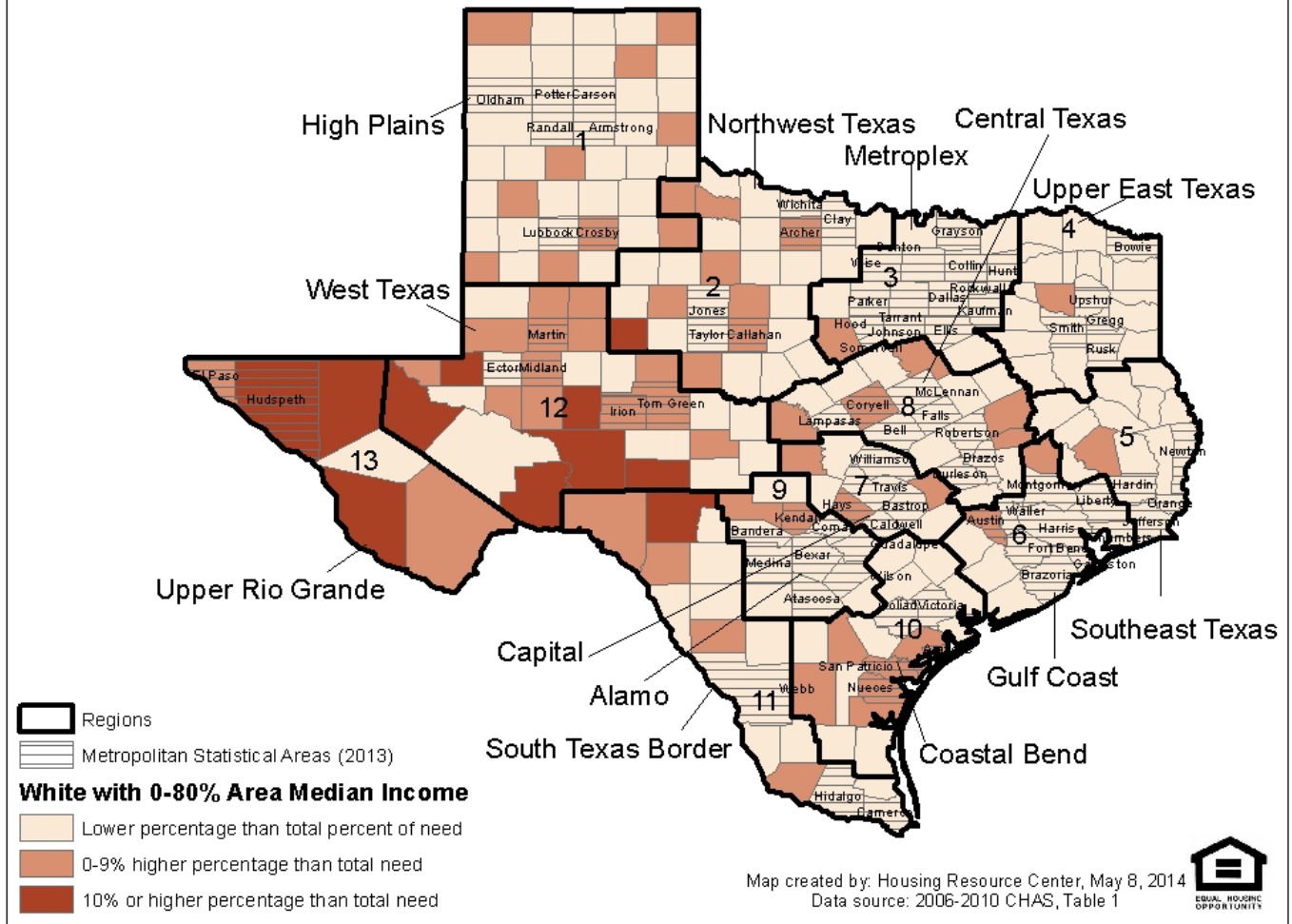
80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	231,641	592,705	0
White	116,055	320,428	0
Black / African American	28,437	69,524	0
Asian	8,508	13,350	0
American Indian, Alaska Native	689	1,832	0
Pacific Islander	223	253	0
Hispanic	74,982	180,759	0

Table 12 - Disproportionally Greater Need 80 - 100% AMI

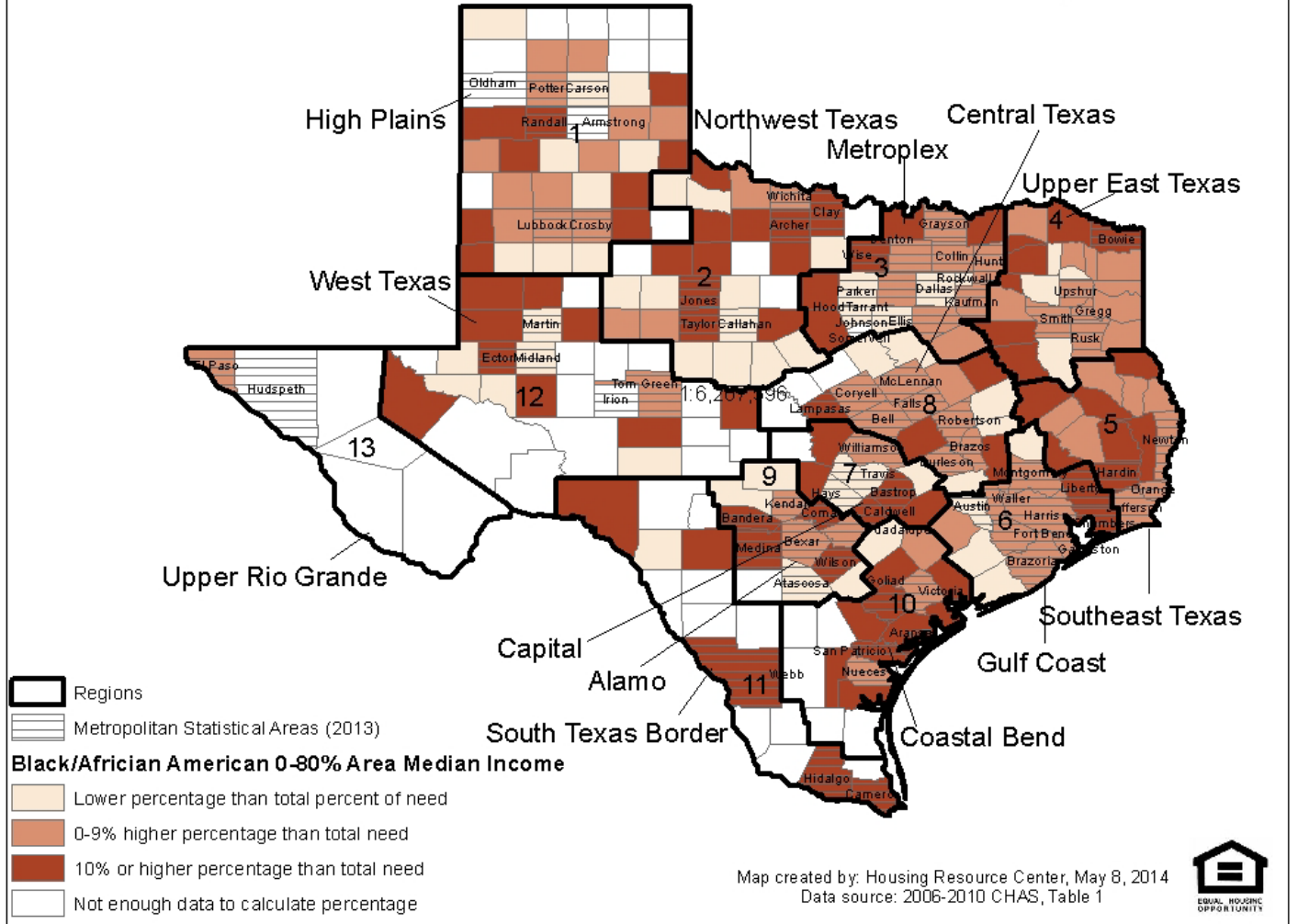
Data Source: 2006-2010 CHAS

Needs Assessment 15: White Disproportionate Housing Need



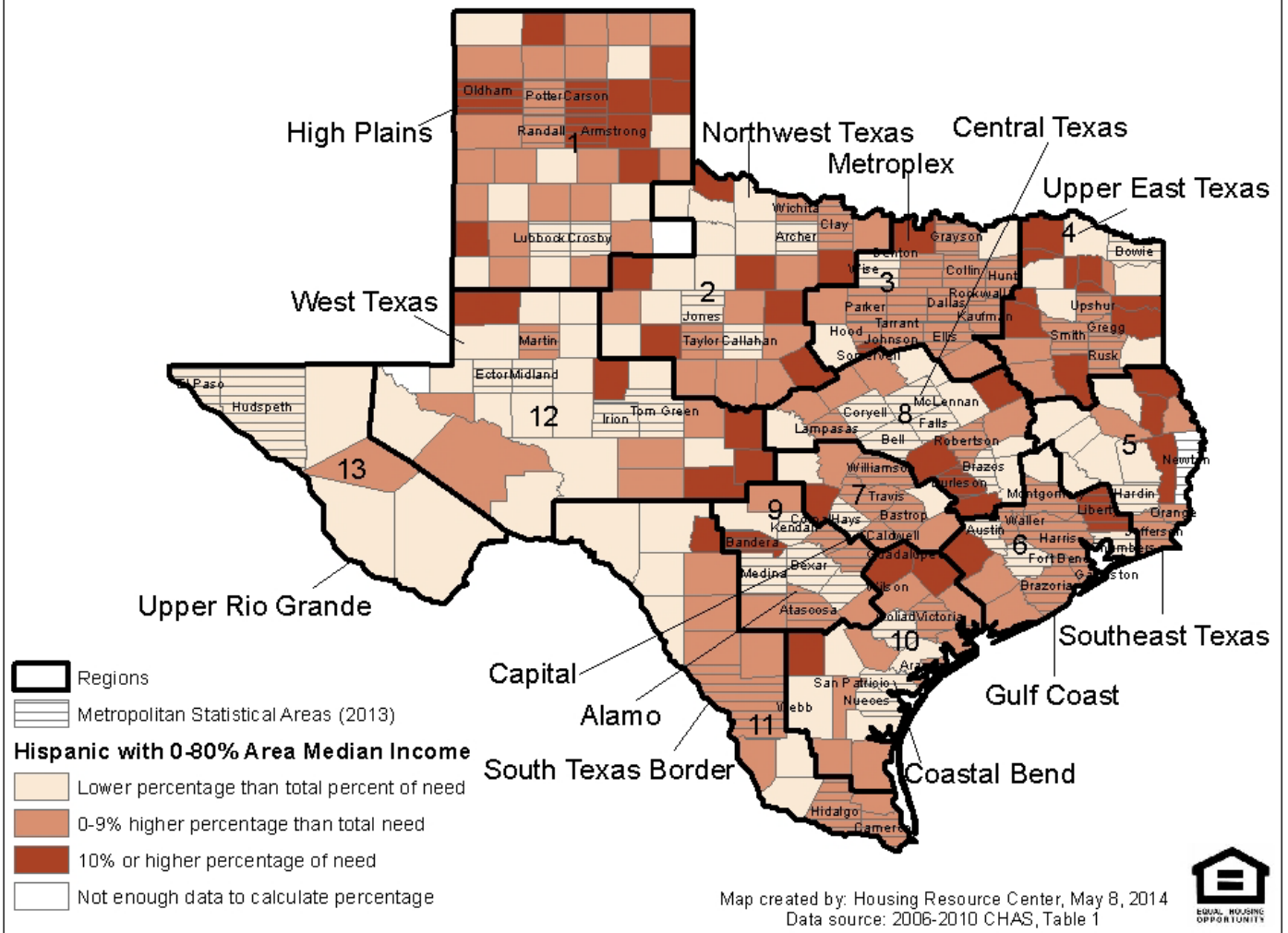
Map 12a

Needs Assessment 15: Black/African American Disproportionate Housing Need



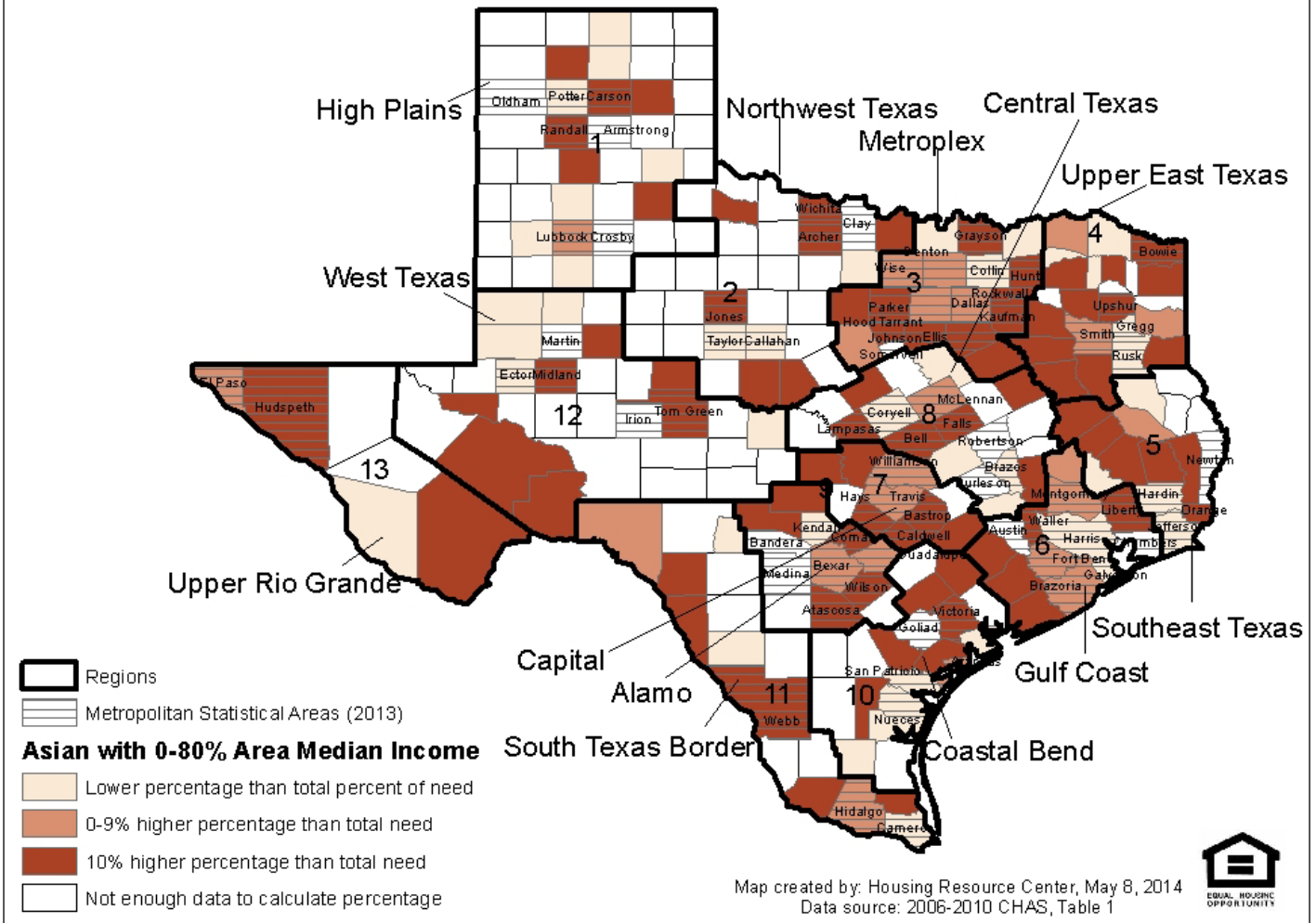
Map 12b

Needs Assessment 15: Hispanic Disproportionate Housing Need



Map 12c

Needs Assessment 15: Asian Disproportionate Housing Need



Map 12d

Discussion

HUD’s eCon Planning Suite Guide defines disproportionate impact as one race having a greater than 10% difference from the jurisdiction. The White, Black/African American, American Indian/Alaskan Native, and Hispanic populations had no disproportionate need compared to the State. The Asian and Pacific Islander populations showed disproportionate need. When mapping the data, certain counties showed disproportionate housing need even though the need at the state level was not disproportionate. If the statewide race/ethnicity population with 0-80% AMI was less than 150,000, no map was made.

The White population had the lowest or second lowest percentage of housing problems. The White population was the largest population, and the White population with housing problems ranged from 2% to 4% lower than the jurisdiction. The map called “White Disproportionate Housing Need” shows disproportionate need of the White population along the Upper Rio Grande and West Texas regions. This could be because these regions have high poverty rates (see Needs Assessment Section 30 for a

discussion of the Texas-Mexico border) making housing problems more common. Because the White population is not the majority race/ethnicity in that region, it is more possible that Whites will experience a disproportionate need, since the denominator for the total population does not consist mainly of the White population.

The Black/African American population ranged from 1% to 4% different than the State. Similarly, the American Indian/Alaska Native population ranged from 1% to 3% different. These percentages do not show disproportionate housing problems. The map called “Black/African American Disproportionate Housing Need” shows that every region but the Upper Rio Grande has counties with Black/African Americans with disproportionate need.

The Asian population had the lowest percentage of housing problems (72%) in the 0-30% AMI category, and this was the only instance when the White population did not have the lowest percentage. However, the Asian population had the highest percentage with housing problems in the >30-50% AMI category: 83% of Asian households in this income category had problems compared to the jurisdiction at 71%. The percentage of the Asian population with housing problems was also 11% higher in the >50-80% AMI category, and 11% higher in the >80-100% AMI category for the jurisdiction. The map called “Asian Disproportionate Housing Need” shows that every region has counties with the Asian population with disproportionate need, though many of the central and east regions hold a majority of those counties.

The Pacific Islander population had the greatest difference with the jurisdiction as a whole. The Pacific Islander population has the highest percentage of population with housing problems in the >50-80% and 80-100% AMI categories. In the >50-80% AMI category, 59% of Pacific Islander households had problems compared to 46% of the jurisdiction. In the >80-100% AMI category, Pacific Islanders were 19% higher, at 47% compared to the jurisdiction at 28%.

In all income categories, the Hispanic population had a range of 3-9% higher need than the jurisdiction as a whole. Notably, Hispanics were the largest ethnic group in the 0-30% AMI and >30%-50% AMI categories. However, when combining all households for the 0-100% AMI category, the Hispanic households were 247,625 less than the White households. The high denominator in the 0-50% AMI categories may have reduced disproportionate impacts, since Hispanics were the majority. The map called “Hispanic Disproportionate Housing Need” shows that there are a range of counties with disproportionate need for Hispanics, with many in the High Plains and Upper East Texas regions.

NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.305(b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

There were almost one half as many households with severe housing problems than households with non-severe housing problems, at 1,365,680 compared to 2,430,592 respectively. With these smaller numbers, there were also significantly fewer instances of disproportionate severe housing need than disproportionate non-severe housing need. However, similar trends found in the non-severe housing problems section (Needs Assessment 15) are found in this section with the severe housing problems.

Please note that, while there may be disproportionate impact for the Asian and Pacific Islander populations using HUD’s recommendation of 10% difference with the jurisdiction, this measurement may not be statistically significant. A much more precise analysis is found in the Phase 2 AI, based on 20% threshold for minority concentration and comparing the census tracts to the counties or Metropolitan Statistical Areas. Therefore, HUD’s recommended 10% measurement will be used for informational purposes, but any actions to alleviate disproportionate impact will be governed by the Phase 2 AI.

0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	696,145	268,529	90,955
White	251,019	100,672	38,162
Black / African American	137,303	52,248	17,654
Asian	18,181	4,744	5,722
American Indian, Alaska Native	3,004	961	483
Pacific Islander	424	25	64
Hispanic	278,251	107,223	27,949

Table 13 – Severe Housing Problems 0 - 30% AMI

Data Source: 2006-2010 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than 1.5 persons per room,
4. Cost Burden over 50%

30%-50% of Area Median Income

Severe Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	370,828	645,949	0
White	133,657	264,727	0
Black / African American	52,931	94,188	0
Asian	11,155	11,970	0
American Indian, Alaska Native	1,097	2,290	0
Pacific Islander	359	203	0
Hispanic	167,835	266,179	0

Table 14 – Severe Housing Problems 30 - 50% AMI

Data Source: 2006-2010 CHAS

50%-80% of Area Median Income

Severe Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	225,190	1,176,751	0
White	83,940	558,401	0
Black / African American	25,190	161,822	0
Asian	8,590	26,292	0
American Indian, Alaska Native	586	4,034	0
Pacific Islander	353	681	0
Hispanic	104,406	411,934	0

Table 15 – Severe Housing Problems 50 - 80% AMI

Data Source: 2006-2010 CHAS

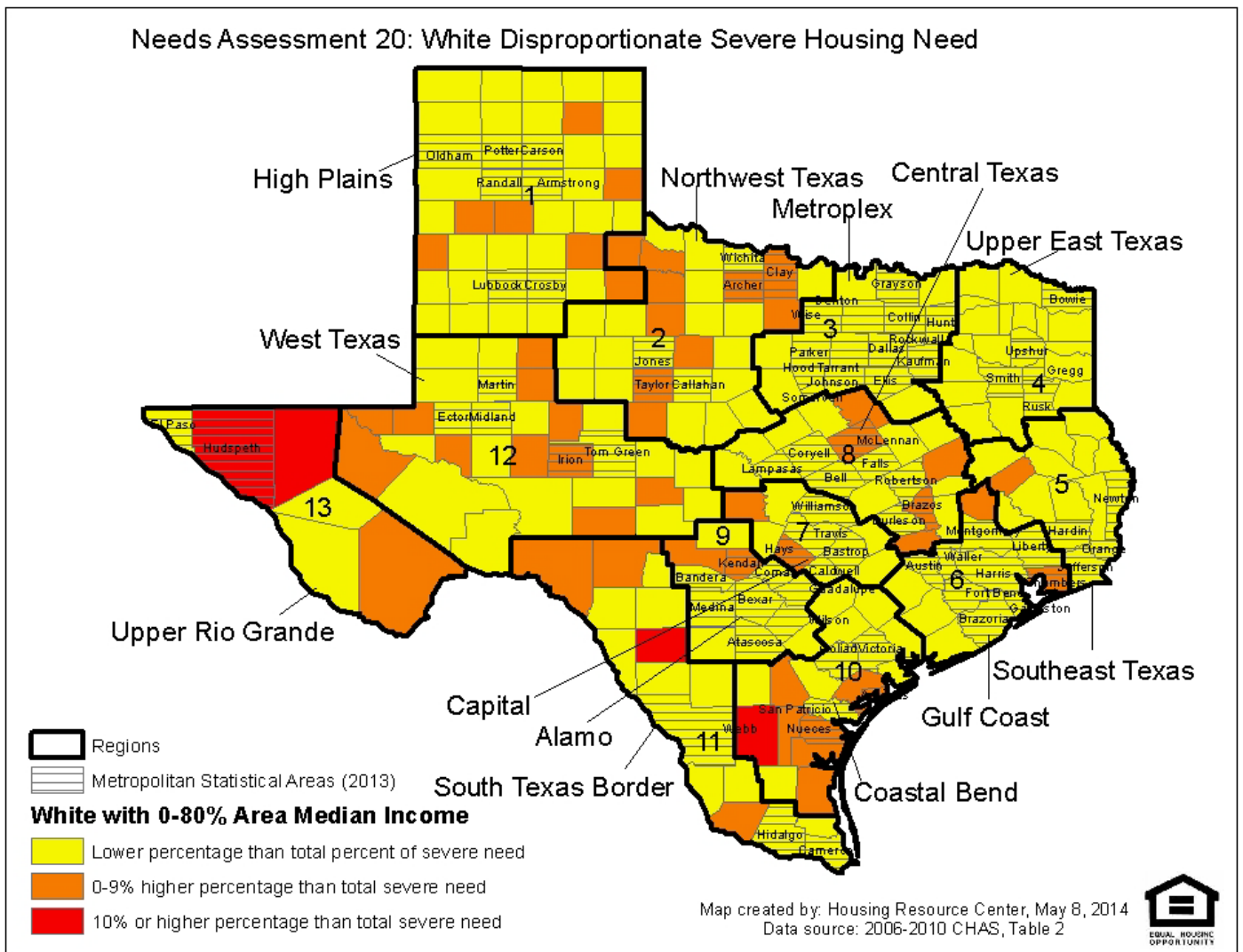
80%-100% of Area Median Income

Severe Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	73,517	751,004	0
White	27,683	408,877	0
Black / African American	6,903	91,005	0
Asian	3,091	18,766	0
American Indian, Alaska Native	170	2,346	0
Pacific Islander	39	437	0
Hispanic	34,972	220,803	0

Table 16 – Severe Housing Problems 80 - 100% AMI

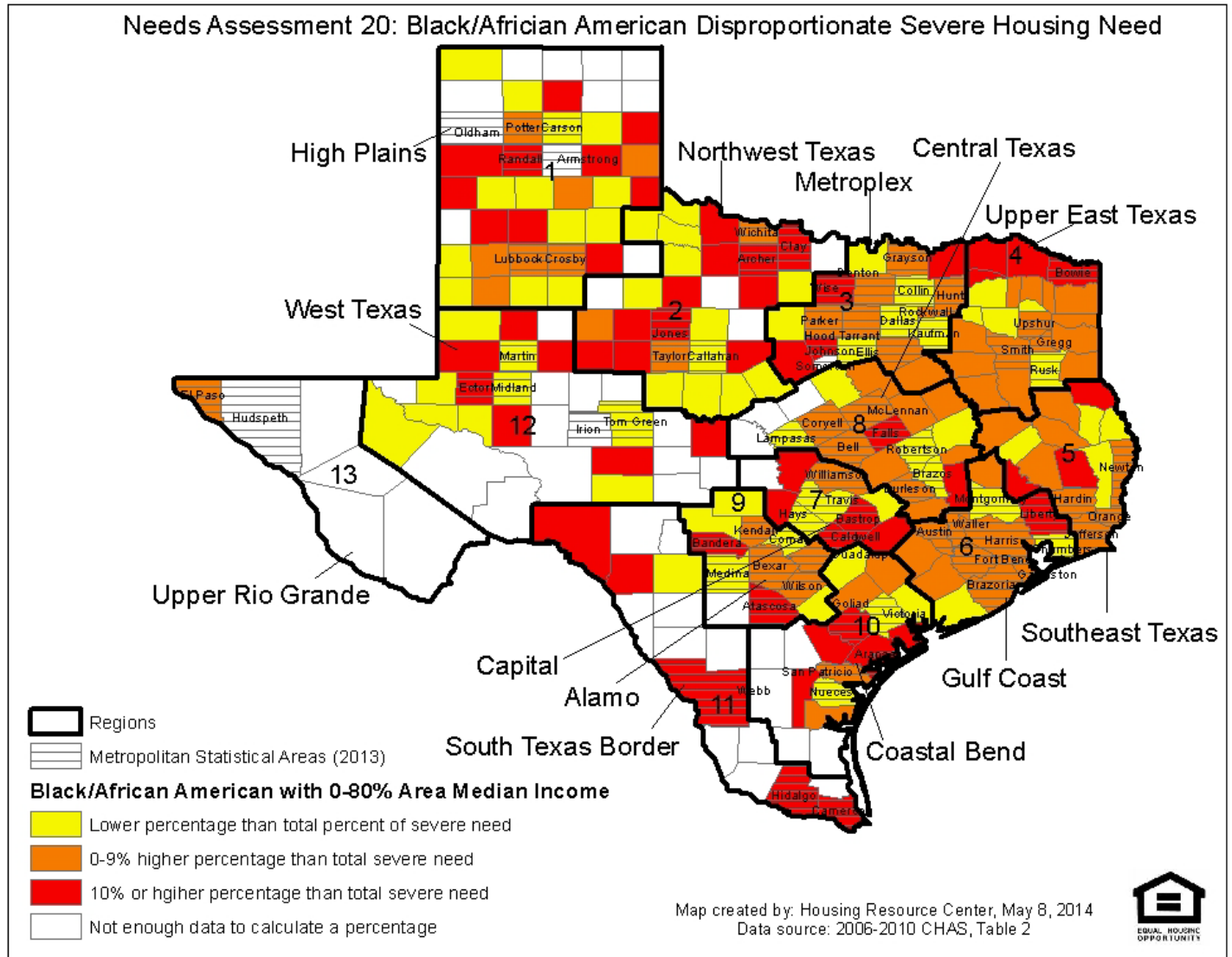
Data Source: 2006-2010 CHAS

Needs Assessment 20: White Disproportionate Severe Housing Need



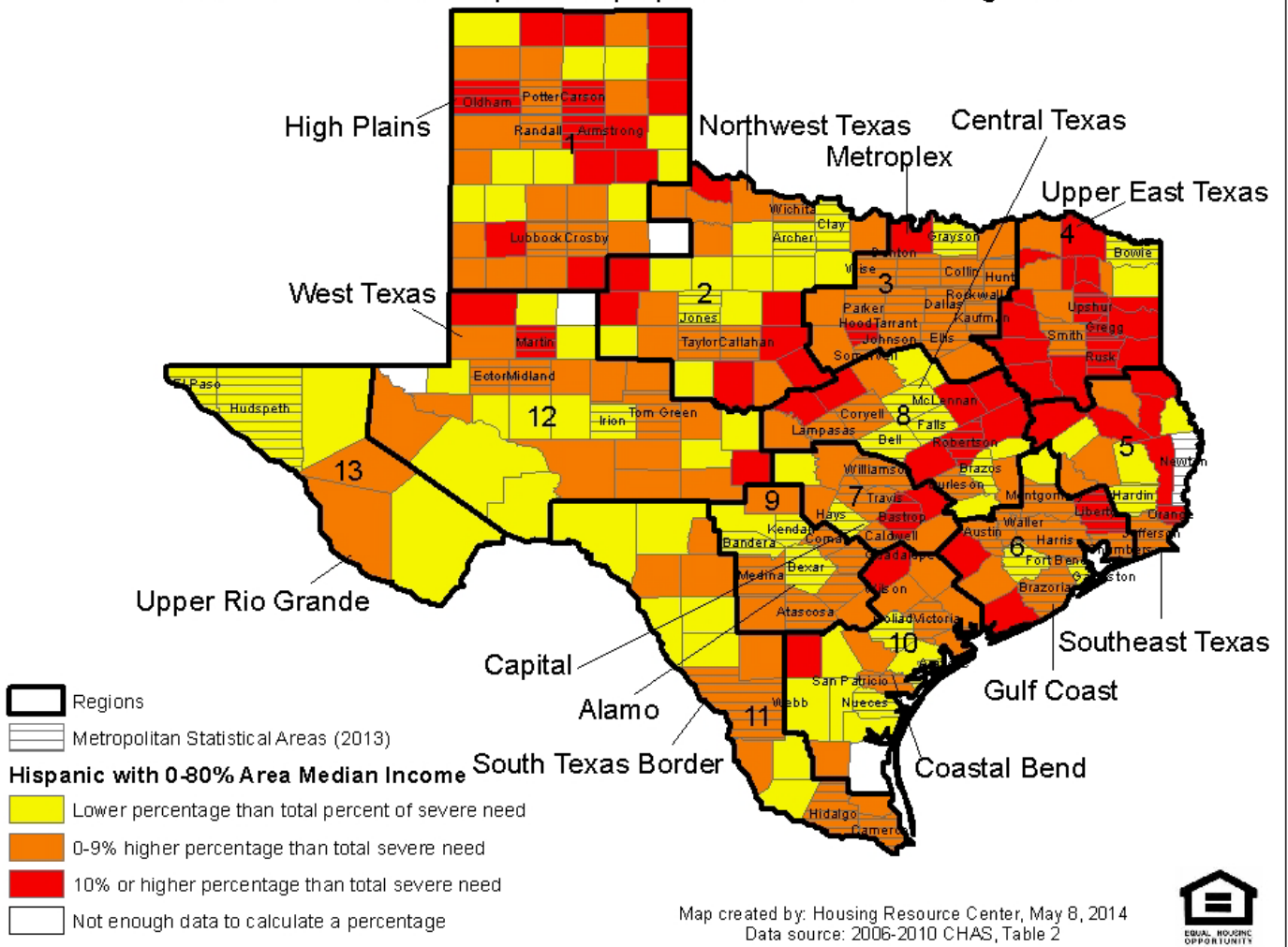
Map 16a

Needs Assessment 20: Black/African American Disproportionate Severe Housing Need



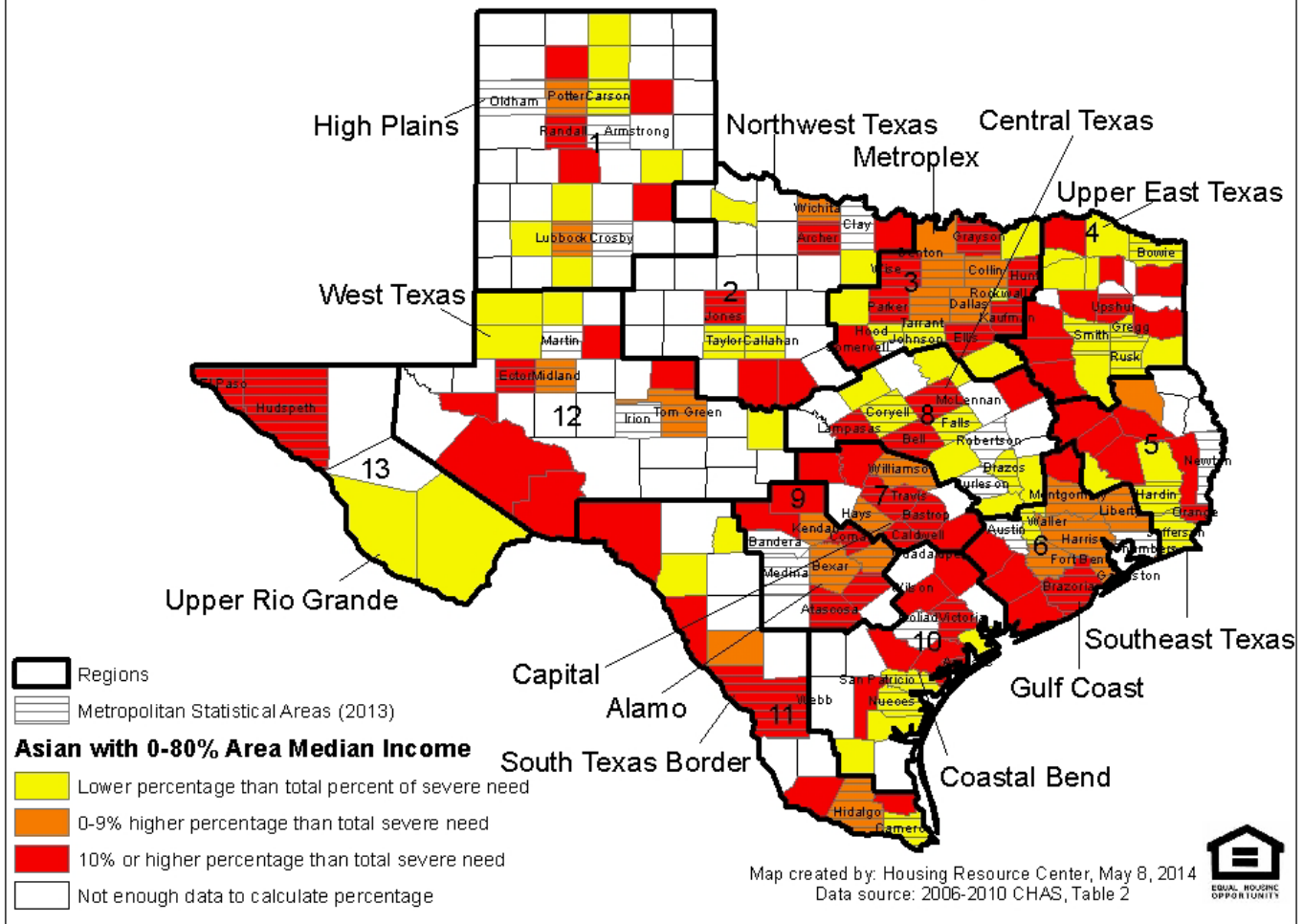
Map 16b

Needs Assessment 20: Hispanic Disproportionate Severe Housing Need



Map 16c

Needs Assessment 20: Asian Disproportionate Severe Housing Need



Map 16d

Discussion

Similar to those with non-severe housing problems, the White population with severe housing problems had the lowest or second lowest percentage of households. Again, like non-severe housing problems, the Asian population had the lowest population with severe housing problems in the 0-30% AMI category at 63% compared to 64% of the White population. Unlike the non-severe housing problems, the American Indian/Alaska Native population had the lowest percentage with severe housing problems in the >30-50% AMI category, at 32% compared to 34% of the White population in that income category. When mapping the data, certain counties showed disproportionate severe housing need even though the need at the state level was not disproportionate. If the statewide race/ethnicity population with 0-80% AMI was less than 150,000 in number, no map was made.

Consistent with non-severe housing problems, the map called “White Disproportionate Severe Housing Need” shows that counties with a disproportionate need of the White population with severe housing need were in the Upper Rio Grande, South Texas Border or Coastal Bend regions. Again, just as the

Needs Assessment Section 30 states, the border region had high rates of poverty, a majority of Hispanics, and a disproportionate need of the White population as compared to the rest of the State.

Even though the Black/African American population did not have disproportionate need compared to the jurisdiction as a whole, the map called “Black/African American Disproportionate Severe Housing Need” shows that several counties have disproportionate severe need for this population in every region except the Upper Rio Grande. The most counties with disproportionate need were in the High Plains and Northwest Texas regions.

Similarly, though the Hispanic population did not have disproportionate need compared to the jurisdiction as a whole, the map called “Hispanic Disproportionate Severe Housing Need” shows many counties with disproportionate need, with a concentration in the High Plains, Central Texas, and Upper East Texas regions.

Similar to non-severe housing problems, Pacific Islanders have the highest percentages of severe housing problems in most of the income categories: at 17% higher in the 0-30% AMI category, 27% higher in the >30-50% AMI category, and 18% higher in the >50-80% category. The 80-100% AMI category does not follow the trend, since Pacific Islanders had a 1% lower percentage of households with severe household problems than the jurisdiction as a whole. When considering these figures, the percentages may be higher for Pacific Islanders because of the small number of Pacific Islanders in the sample. Pacific Islanders range from .05%-.1% of the total jurisdiction within each income level. Although the margins of error are not given in the charts in Needs Assessment Section 20, with numbers this small compared to the other figures, the margin of error would likely be greater than the other figures.

The other instance in which the percentage of households with severe housing problems was greater than 10 percentage points was the Asian population in the 30-50% AMI category. The Asian population, while the lowest percentages in the 0-30% AMI category, was 12% higher than the jurisdiction as a whole. In the map called “Asian Disproportionate Severe Housing Need” shows that counties with a disproportionate need for Asians are in every region.

NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.305 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

As discussed in Needs Assessment Section 10, the most common housing problem was cost burden. Because the percentages of cost burden were relatively high compared to other problems, the differences between the percentages were likely to be small because of the large numbers involved. The table below shows cost burden and severe cost burden by race.

Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	5,635,839	1,427,252	1,108,050	98,178
White	3,406,696	658,138	472,923	39,502
Black / African American	530,834	205,277	200,741	18,809
Asian	163,478	42,707	36,234	6,341
American Indian, Alaska Native	19,303	4,904	4,238	497
Pacific Islander	3,136	835	672	64
Hispanic	1,458,317	499,202	380,028	31,952

Table 17 – Greater Need: Housing Cost Burdens AMI

Data Source: 2006-2010 CHAS

Discussion

There are no instances of disproportionate cost burden by race/ethnicity. No maps were made since no disproportionate impact was found. The jurisdiction as a whole has 68% of households which pay between 0 and 30% of their income on rent, meaning they are not cost burdened. The White population has the highest percentage of households that pay between 0 and 30% of their income on rent. The Black/African American population has the lowest percentage of households that pay between 0 and 30% of their income on housing at 56%. While the difference between the Black/African American percentage and the Jurisdiction as a whole is 13%, this is not disproportionate burden because the measurement is positive: it is the number of households *without* cost burden.

The percentages of households with cost burden greater than 30% but less than 50% all have less than a 10% difference with the jurisdiction as a whole, which is 17%. The White population has the lowest percentage with cost burden (14%), and the Black/African American and Hispanic Population tie for highest percentage (21%).

Following the trend of cost burden, the percentages of households in all race/ethnicities with severe cost burden greater than 50% all have less than a 10% difference than the jurisdiction as a whole, which is 13%. The White population has the lowest percentage with severe cost burden (10%) and the Black/African American population has the highest percentage at (21%).

NA-30 Disproportionately Greater Need: Discussion – 91.305 (b)(2)

Are there any Income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?

The Needs Assessment Sections 15 and 20 showed that the Asian and Pacific Island populations had a disproportionately greater need than other populations. The Asian population had a disproportionate need at 11% higher than the jurisdiction as a whole with housing problems in the 30-100% AMI categories. Pacific Islanders were the most dramatically disproportionate with 13-19% of the population with housing problems higher than the jurisdiction as a whole. For severe housing problems, the Asian population again had disproportionate need at 12% higher than the jurisdiction. Similarly, Pacific Islanders had a disproportionate need from 17 to 27% higher than the jurisdiction.

When examining cost burden separate from overcrowding or substandard housing in the Needs Assessment Section 25, the disproportionate impact did not affect any race/ethnic category. Since cost burden is the most common housing problem, the disproportionate housing need found in Needs Assessment Sections 15 and 20 is most likely overcrowding and substandard housing.

It should be noted that disproportionate need varies by area measured. When considering the entire state, the Hispanic population did not have any disproportionate need. However, when considering each county, the Hispanic population had disproportionate need in several counties, as shown in the maps in Needs Assessment Section 15 and 20. While the jurisdiction for this Consolidated Plan is the state as a whole, sometimes smaller levels of analysis are needed. For example, the State's Phase 2 AI defines concentrations of minorities by census tract. Smaller areas mean working with smaller numbers, which can result in larger differences, since the denominator in the percentage calculation is smaller.

Please note that, while there may be disproportionate impact for the Asian and Pacific Islander populations using HUD's recommendation of 10% difference with the jurisdiction, this measurement may not be statistically significant. A much more precise analysis is found in the Phase 2 AI, based on 20% threshold for minority concentration and comparing the census tracts to the counties or Metropolitan Statistical Areas. Therefore, HUD's recommended 10% measurement will be used for informational purposes, but any actions to alleviate disproportionate impact will be governed by the Phase 2 AI.

If they have needs not identified above, what are those needs?

Poverty along the Texas-Mexico border can be particularly acute. Starr and Willacy counties, for example, had poverty rates of 39.9% and 37.7% according to the 2008-2012 American Community Survey Table (S1703). This was more than twice as high as the 17.4% of people in poverty for the state as a whole during the same time period. These areas of the state also have high concentrations of the Hispanic population, a population typically underrepresented in assisted housing programs, per stakeholder surveys in Phase 2 AI.

Poverty along the Texas-Mexico border is especially pronounced and concentrated in "colonias," Spanish for neighborhood or community. These areas have a majority population composed of individuals and families of low and very low income. According to Section 2306.581 of the Texas Government Code, "colonia" means a geographic area located in a county some part of which is within 150 miles of the

international border of this state, consists of 11 or more dwellings that are located in close proximity to each other in an area that may be described as a community or neighborhood and

- has a majority population composed of individuals and families of low and very low income, based on the federal Office of Management and Budget ("OMB") poverty index and meets the qualifications of an economically distressed area under Section 17.921, Water Code; or
- has the physical and economic characteristics of a colonia, as determined by the department.

Border colonias are generally located beyond city limits and have reduced infrastructure and poor housing, such as self-built homes on a slab or pier-and-beam or hybrid arrangements in which a trailer melds with a makeshift extension. Since 1995, land under 10 acres to be subdivided into residential lots is required to have water and wastewater infrastructure per the State's model subdivision rules. While post-1995 colonias tend to be larger subdivisions, they share some of the worst housing characteristics common during the 1980s colonias expansion. Contracts for deed are a common pathway to land ownership in the colonias, in which buyers often make long term high-interest payments to a seller for their property. Buyers are in a vulnerable position because they receive title only after all payments are made, and sellers can easily retain all the payments if a buyer defaults. There are nearly 5,500 recorded contracts for deed in Texas, and another estimated 6,500 unrecorded contracts for deed in colonias of six border counties (Ward, Way and Wood, 2012).

Another obstacle to affordable housing can be difficulty obtaining a clear title for low-income homeowners. The Contract for Deed Prevalence Project contracted by TDHCA found that a key trend was for many properties in colonias to transfer via intestacy law, leading to a dramatic increase in clouded property titles. Not only was this trend found in colonias, it also mirrored what was found in older African-American communities. Properties with multiple owners and legal ownership that does not match the residents' understanding of ownership or the deed records "leads to serious problems with delivery of disaster recovery and other government rebuilding assistance, barring families' ability to ever resell their property, market under-performance and under-valuation, and a host of other issues (Ward, Way and Wood, 2012, page x). Clear titles are required for some homeowners to meet program eligibility requirements and protect TDHCA's investment in affordable housing.

Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?

Because Texas is the second most populous state in the nation the racial groups listed in the Needs Assessment Sections 15 and 20 are all within Texas borders. The maps made in Needs Assessment 15 and 20 show where the racial or ethnic groups with a greater than 10% need or severe need are located. Every racial or ethnic group mapped had an area with a 10% greater need than the county as a whole. Even the white population, which is the largest or second largest race in each county, had a higher rate of housing problems in some counties than the county population as a whole. These counties were concentrated near the Texas-Mexico border.

As discussed in Market Analysis Section 50, in the Phase 2 AI, there are areas in Texas that show minority concentration and a related concentration of low-income households along the Texas-Mexico Border and Rio Grande Valley, which leads to several trends as cited in resident and stakeholder surveys. Due to language barriers and citizenship requirements on certain assisted housing programs, in addition to need for more internal data regarding sub-recipient marketing and outreach, some of the needs of

Hispanic populations along the Texas-Mexico border may be unknown and require further analysis. According to the Phase 2 AI's demographic results and assisted housing analysis, Hispanic populations, while one of the majority populations in certain regions of the state, are generally underrepresented in Section 8, HOME Single Family, Neighborhood Stabilization Program Single Family, Housing Trust Fund Single Family, and Housing Tax Credit programs.

When it comes to colonias, there are an estimated 400,000 people in 2,294 colonias along Texas' 1,248 mile border with Mexico, according to a 2010 study (Anders, Wiebe, and Albrechtsen 2010).

NA-35 Public Housing – (Optional)

Introduction

TDHCA serves as a Public Housing Authority (“PHA”). As such, TDHCA has the authority to issue up to 1,540 Section 8 Housing Choice Vouchers (“HCVs”) but available funds to only administer approximately 840.

Totals in Use

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	0	0	0	833	0	833	0	0	0

Table 18 - Public Housing by Program Type

***includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

*Special Purpose Voucher - Disabled: There are 15 out of 35 vouchers currently being used by Project Access, which assist persons under the HUD Special Purpose Voucher category "Non-Elderly Disabled".

Data Source: PIC (PIH Information Center)

Characteristics of Residents

	Program Type							
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher	
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program
# Homeless at admission	0	0	0	0	0	0	0	0
# of Elderly Program Participants (>62)	0	0	0	143	0	143	0	0
# of Disabled Families	0	0	0	228	0	228	0	0
# of Families requesting accessibility features	0	0	0	833	0	833	0	0
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

Table 19 - Characteristics of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Note - # of Families requesting accessibility features: The number of families requesting accessibility features is printing as TDHCA's total number of vouchers: 833. This total is incorrect and, TDHCA staff affirms, is too high. Staff members typically receive less than 10 requests for accessibility features per year.

Race of Residents

Race	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	0	0	255	0	255	0	0	0
Black/African American	0	0	0	574	0	574	0	0	0
Asian	0	0	0	0	0	0	0	0	0
American Indian/Alaska Native	0	0	0	1	0	1	0	0	0
Pacific Islander	0	0	0	3	0	3	0	0	0
Other	0	0	0	0	0	0	0	0	0

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Table 20 – Race of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Ethnicity of Residents

Ethnicity	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	0	0	108	0	108	0	0	0
Not Hispanic	0	0	0	725	0	725	0	0	0

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Table 21 – Ethnicity of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:

TDHCA's Public Housing Authority Plan does not include physical units. However, in the State as a whole, there were approximately 61,720 units of low-rent public housing in 2013, according to the U.S. Department of Housing and Urban Development's ("HUD") Multifamily Assistance and Section 8 Contracts database (<http://www.hud.gov/offices/hsg/mfh/exp/mfhdiscl.cfm>). Because there is not a centralized system for accepting applications for public housing assistance and because TDHCA does not accept applications directly from individuals for a majority of its programs, there is no data available on the needs of applicants on waiting lists for accessible units.

What are the number and type of families on the waiting lists for public housing and section 8 tenant-based rental assistance? Based on the information above, and any other information available to the jurisdiction, what are the most immediate needs of residents of public housing and Housing Choice voucher holders?

As stated above, there is not a centralized system for accepting applications for all public housing assistance and there is no data available on the needs of applicants on waiting lists for PHAs. TDHCA does maintain this information for its own Section 8 Program and the waiting list, as of October 2014, is as follows:

Ennis, TX: 160

Giddings, TX: 21

Waller County, TX: 124

Waxahachie, TX: 257

Project Access Waiting List (not included in the areas listed above): 115

How do these needs compare to the housing needs of the population at large

The needs of Public Housing residents are discussed in Needs Assessment Section 45.

Discussion:

The relationship between the State and PHAs in Texas will be explored in Strategic Plan Section 50.

NA-40 Homeless Needs Assessment – 91.305(c)

Introduction:

According to HUD’s 2013 Point-in-Time count for Texas, there were approximately 29,615 homeless people in January 2013. The number of homeless in 2013 decreased from 2012 by 13.0%. In addition, the Texas Homeless Network commented during the public comment period that the 2014 Point-in-Time count showed that the number of homeless persons declined a second year in a row. The change between 2012 and 2014 Point-in-Time counts results in a 16.3% reduction of persons who are homeless. One tool which addresses homeless populations in Texas is the Emergency Solutions Grant Program ("ESG"). ESG reflects the changes in the program’s focus from addressing the needs of homeless people in emergency shelters to assisting people to quickly regain stability in permanent housing after experiencing a housing crisis and/or homelessness and to a greater focus on collaboration and coordination with HUD's designated Continuum of Care ("CoCs"). The ESG program provides funding to: (1) engage homeless individuals and families living on the street; (2) improve the number and quality of emergency shelters for homeless individuals and families; (3) help operate these shelters; (4) provide essential services to shelter residents, (5) rapidly re-house homeless individuals and families, and (6) prevent families and individuals from becoming homeless. TDHCA administers the ESG funds in a manner consistent with the McKinney-Vento Homeless Assistance Act, as amended (42 USC. Sec 11371 et seq.).

Homeless Needs Assessment

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s) and Child(ren)	294	2,532	Not available	Not available	Not available	Not available
Persons in Households with Only Children	422	214	Not available	Not available	Not available	Not available
Persons in Households with Only Adults	9,764	8,715	Not available	Not available	Not available	Not available
Chronically Homeless Individuals	3,093	1,677	Not available	Not available	Not available	Not available
Chronically Homeless Families	274	491	Not available	Not available	Not available	Not available
Veterans	1,871	2,007	Not available	Not available	Not available	Not available
Unaccompanied Child	422	214	Not available	Not available	Not available	Not available
Persons with HIV	348	486	Not available	Not available	Not available	Not available

Table 22 - Homeless Needs Assessment

Data Source Comments: PIT estimates based on HUD’s 2013 Continuum of Care Homeless Assistance Programs Homeless Populations and Subpopulations for the State of Texas. Annual estimates are covered in narrative section of the report.

Indicate if the homeless population is: Partially Rural Homeless

Rural Homeless Needs Assessment

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s) and Child(ren)	804	1,724	Not available	Not available	Not available	Not available
Persons in Households with Only Children	288	105	Not available	Not available	Not available	Not available
Persons in Households with Only Adults	4,477	1,336	Not available	Not available	Not available	Not available
Chronically Homeless Individuals	1,374	423	Not available	Not available	Not available	Not available
Chronically Homeless Families	79	73	Not available	Not available	Not available	Not available
Veterans	1,032	675	Not available	Not available	Not available	Not available
Unaccompanied Youth	251	93	Not available	Not available	Not available	Not available
Persons with HIV	273	177	Not available	Not available	Not available	Not available

Table 23 - Homeless Needs Assessment

Data Source Comments: PIT estimates based on HUD's 2013 Continuum of Care Homeless Assistance Programs Homeless Populations and Subpopulations for the State of Texas. Annual estimates are covered in narrative section of the report.

For persons in rural areas who are homeless or at risk of homelessness, describe the nature and extent of unsheltered and sheltered homelessness with the jurisdiction:

The Texas Interagency Council for the Homeless' *2012 Annual Report and Pathways Home Addendum* states that "Homelessness is not a static condition. Most individuals experience short episodes of homelessness lasting only a few nights. Some individuals – many who face multiple barriers to attaining and retaining housing – experience chronic homelessness that lasts more than a year" (2012, p.19). Chronically homeless persons are defined by the McKinney-Vento Homeless Assistance Act, means that, with respect to an individual or family, that individual or family "is homeless" and "has been homeless and living or residing in a place not meant for human habitation, a safe haven, or an emergency shelter continuously for at least 1 year or on at least 4 separate occasions in the last 3 years" and has a head of the household with a disability.

Approximately 1% of the Texas population can be classified as literally homeless (e.g., per 24 CFR § 91.5 "lacking a fixed, regular and adequate nighttime residence") or at-risk of homelessness. The definition of at-risk of homelessness is in Needs Assessment Section 10. TDHCA estimates that 1% of the rural population would also meet these classifications. Rural areas typically have fewer jobs and shelters than urban areas, which makes conditions especially difficult for homeless persons. The National Alliance to End Homelessness reports that homeless persons in rural areas are more likely to be white. Homeless farmworkers and Native Americans are also generally found in rural areas. Farmworkers are at high risk for homelessness because of their mobile lifestyles and extremely low incomes. According to the 2013 Point-in-Time counts for the Texas Balance of State CoC and the Wichita Falls/Wise, Palo Pinto, Wichita, and Archer Counties CoC which account for most of the state's rural populations but include some non-rural areas, there were 9,384 homeless persons in these areas, with 2,708 in emergency shelter, 1,107 in transitional housing, and 5,569 unsheltered.

If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):

Homeless Youth: The National Alliance to End Homelessness cites a study that estimates between 1 million and 1.5 million youth age 18 or under experience homelessness each year. The Alliance finds that this subpopulation is at risk for physical abuse, sexual exploitation, mental health disabilities, chemical or alcohol dependency, and death.

Homeless Veterans: The U.S. Department of Veteran Affairs estimates that 131,000 veterans are homeless each night. In the U.S., approximately 23% of homeless persons are veterans. Sixty-seven percent of homeless veterans served for at least three years and 33% were stationed in a war zone. Many homeless veterans live with mental illness and substance use disorder.

Chronically Homeless Individuals and Families: The 2013 Annual Homeless Assessment Reports estimates that on a single night in 2013, the number of chronically homeless persons in the U.S. totaled 109,132. Of those, 85% were individuals and 15% were people in families.

Homeless Families with Children: The number of homeless families with children has increased significantly over the past decade. A 2007 US Conference of Mayors survey of 23 American cities found that homeless families comprised 23% of the homeless population. These proportions are likely to be higher in rural areas. Research indicates that families, single mothers, and children make up the largest group of people who are homeless in rural areas.

Nature and Extent of Homelessness: (Optional)

Race:	Sheltered:	Unsheltered (optional)
White	Not available	Not available
Black or African American	Not available	Not available
Asian	Not available	Not available
American Indian or Alaska Native	Not available	Not available
Pacific Islander	Not available	Not available
Ethnicity:	Sheltered:	Unsheltered (optional)
Hispanic	Not available	Not available
Not Hispanic	Not available	Not available

Data Source
Comments:

Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.

Homeless Veterans: According to the 2013 Point-in-Time count, there were 3,878 homeless veterans in Texas, with 2,007 sheltered and 1,871 unsheltered.

Chronically Homeless Individuals and Families: The presence of a disability is almost universal in this subpopulation. In addition, this subpopulation most heavily uses available services; while this subpopulation makes up approximately 10% of all homeless persons, they use approximately 50% of the days of shelter provided by support systems. Even though chronically homeless persons most heavily use services, their experiences with mainstream services did not effectively address their needs. Finally, chronically homeless persons often have multiple problems and face a service system that often does not offer a comprehensive set of treatments. According to the 2013 Point-in-Time count, there were 765 chronically homeless families with children in Texas, with 491 sheltered and 274 unsheltered and 4,770 chronically homeless individuals with 1,677 sheltered and 3,093 unsheltered.

Homeless Families with Children: According to the 2013 Point-in-Time count, there were 2,826 homeless families with children in Texas, with 1,140 in emergency shelter, 1,392 in transitional housing, and 294 unsheltered.

Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.

In its 2006 survey of 25 cities, the U.S. Conference of Mayors found the following demographic break down of the homeless population: 42% African-American, 39% White, 13% Hispanic, 4% Native American, and 2% Asian. However, the ethnic makeup of the homeless population will vary by geographic area. While individual COCs may keep demographic records, there is no substantive data

available that describes racial and ethnic demographics of homeless populations in the entire State of Texas.

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

According to HUD's 2013 CoC Homeless Assistance Programs Homeless Populations and Subpopulations report, 41% of homeless persons in Texas were unsheltered at the time of the count. Specifically:

- There were 4,760 homeless youth in Texas, with 1,950 in emergency shelter, 2,470 in transitional housing, and 340 unsheltered;
- There were 6,695 victims of domestic violence who were homeless in Texas, with 4,509 sheltered and 2,425 unsheltered*;
- There were 3,878 homeless veterans in Texas, with 2,007 sheltered and 1,871 unsheltered;
- 19% of the Texas homeless population is considered chronically homeless. Of those, 61% were unsheltered at the time of the count;
- There were 834 homeless persons with HIV/AIDS in Texas, with 486 sheltered and 348 unsheltered; and
- There were 7,013 homeless persons experiencing chronic substance use disorder in Texas, with 3,446 sheltered and 3,567 unsheltered.

*Several public comments requested that this statistic be included in the Needs Assessment discussion: the National Network to End Domestic Violence shows that between 22% and 57% of women experiencing homelessness report that domestic or sexual violence was the immediate cause of their homelessness. Also, 38% of victims of domestic violence become homeless at some point in their lives (2014).

Discussion:

The "continuum of care" approach to fighting homelessness is based on the understanding that homelessness is not caused merely by a lack of shelter, but involves a variety of underlying unmet physical, economic, and social needs. A comprehensive system of services as well as permanent housing is needed to help homeless individuals and families reach independence using a combination of emergency shelters, transitional housing, social services, and permanent housing. The continuum of care system begins with outreach, intake, and assessment. It is followed by safe emergency shelter and/or transitional housing that provide a variety of services including job training, educational services, substance abuse services, mental health services, and family support. Ultimately, the goal is to assist the family or individual achieve permanent housing.

Through the ESG Program, TDHCA funds organizations that provide the services necessary to help persons who are at-risk of homelessness or homeless quickly regain stability in permanent housing. Subrecipient organizations provide shelter and related services for homeless persons, as well as intervention services to persons threatened with homelessness. Activities include assistance in obtaining permanent housing; and homeless prevention services, such as rent and utility assistance as well as renovating buildings for use as shelters and medical and psychological counseling. Demonstrating the need for homeless shelter and services, for the 2013 ESG application cycle, the Department received 71 applications and was able to fund only 23.

Many of the organizations that applied to TDHCA for funding serve all homeless individuals or target families with children specifically. The Texas Health and Human Services Commission's Family Violence Program funds family violence centers located throughout the State that provide services to victims of family violence. Services for victims include 24-hour hotline guidance, information and referral services, legal services, counseling, emergency transportation, assistance in obtaining medical care and job training, and selected family violence centers providing temporary shelter services. Many of those receiving services through this program are women with children.

NA-45 Non-Homeless Special Needs Assessment – 91.305 (b,d)

Introduction

The State addresses special needs populations in a variety of ways, as described below, in Strategic Plan Section 25, and Action Plan Sections 15 and 25. The special needs populations discussed below were designated by HUD or Texas Government Code. Special Needs Populations include:

- Colonias, and by assumption, its residents (Texas Government Code §2306.127, Section 916 of the Cranston-Gonzalez National Affordable Housing Act of 1990)
- Elderly and Frail Elderly Populations (Texas Government Code §2306.511 and 24 Code of Federal Regulations §91.305(d))
- Homeless Populations and Persons at Risk of Homelessness (Texas Government Code §2306.001(6), §2306.053, and 24 Code of Federal Regulations §91.305(c))
- Persons with Alcohol and Substance Abuse Issues (Texas Government Code §2306.511, 24 Code of Federal Regulations §91.305(d))
- Persons with Disabilities (mental, physical, intellectual, developmental) (24 Code of Federal Regulations §91.305(d))
- Persons with HIV/AIDS and their Families (24 Code of Federal Regulations §91.305(d))
- Public Housing Residents and Persons on Wait Lists for Public Housing (24 Code of Federal Regulations §91.305(b)(1)(G))
- Victims of Domestic Violence, including persons with Violence Against Woman Act ("VAWA") protections (domestic violence, dating violence, sexual assault, or stalking) (24 Code of Federal Regulations §91.305(b)(1)(I))

While not specifically designated as "special needs" the State is directed by Texas Government Code §2306.0721 to analyze data on the following populations: farmworkers, youth aging out of foster care, and veterans (which may include wounded warriors, as defined by the Caring for Wounded Warriors Act of 2008); these populations are often considered specifically in plans and programming of funds.

This Consolidated Plan focuses on PLWH and their families because Housing Opportunities for Persons with AIDS ["HOPWA"] is a specific funding source for this population. Housing is a critical need for PLWH; the National HIV/AIDS Strategy has a U.S. housing goal to increase the Ryan White HIV/AIDS Program clients with permanent housing from 82% to 86% by 2015 (The White Housing Office of National AIDS Policy, 2010).

Quantitative and qualitative data show that HOPWA improves medical adherence, health outcomes, and access to supportive services and health care. As more PLWH live longer, need for HOPWA increases. In 2013, the Texas HOPWA program assisted 923 unduplicated clients with housing and benefited an additional 796 family members, of which 87 of the family members were reported to also be HIV-positive. HOPWA provides housing to direct clients, and additional PLWH, which is a vital step for linkage and adherence to medical care. Many clients that receive assistance from HOPWA have no other housing and care options.

HOPWA addresses the unmet housing services needs of PLWH and their families by providing housing assistance and supportive services to income-eligible individuals. These services are integrated with the

larger Ryan White Program both in administration and service delivery, which is integrated into the larger, multi-sectoral system for delivering treatment and care to these clients. HOPWA's goals are to help low-income HIV-positive clients establish or maintain affordable and stable housing; to reduce the risk of homelessness; and to improve access to health care and supportive services. HOPWA serves PLWH who are 80% or less of AMI, but a majority of Texas HOPWA clients have incomes under 30% AMI.

The answers to the following questions will address all the special needs populations, with emphasis on PLWH.

HOPWA

Current HOPWA formula use:	
Cumulative cases of AIDS reported	14,946
Area incidence of AIDS	638
Rate per population	8
Number of new cases prior year (3 years of data)	1,428
Rate per population (3 years of data)	6

Current HIV surveillance data:	
Number of Persons living with HIV (PLWH)	13,055
Area Prevalence (PLWH per population)	158
Number of new HIV cases reported last year	0

Table 24 – HOPWA Data

Data Source: CDC HIV Surveillance

Texas 2012 HIV/AIDS Surveillance Data

At the end of 2012, 72,932 PLWH were living in Texas, many at incomes below the poverty level, and the number continues to rise every year. “In 2011...Texas had the 8th highest rate (19.7/100,000 population) of new HIV diagnoses in the nation” (Texas Department of State Health Services, 2014).

Texas HIV Infection Cases and Case Rates by Year of Diagnosis, 2003-2012

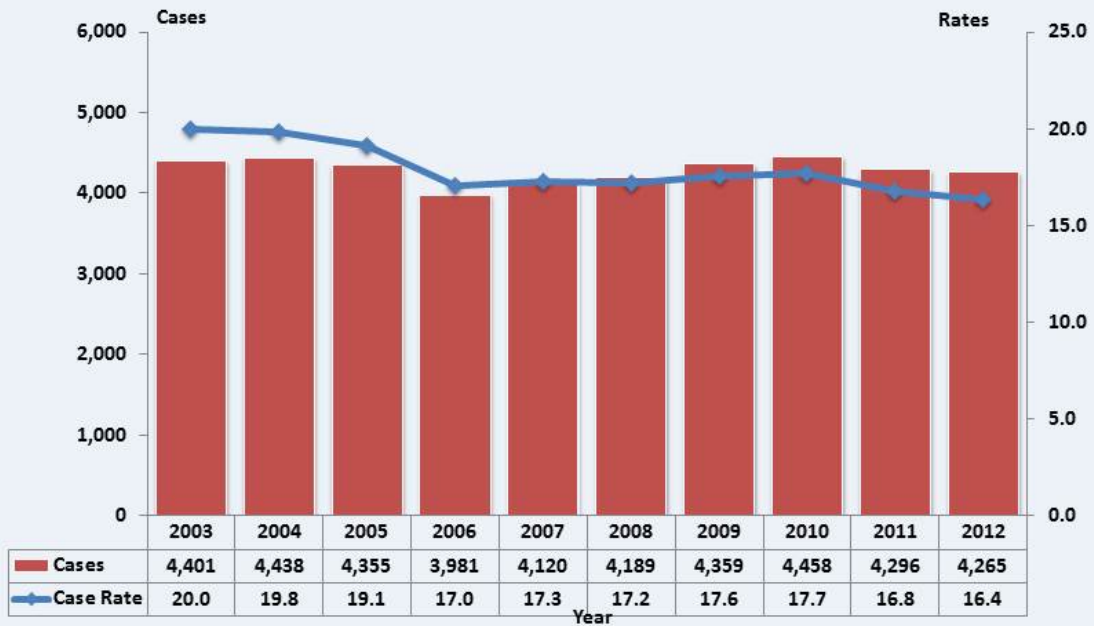


Chart 24a: 2003-2012 TX HIV Cases and Case Rates by Year

Texas AIDS Cases and Case Rates by Year of Diagnosis, 2003-2012

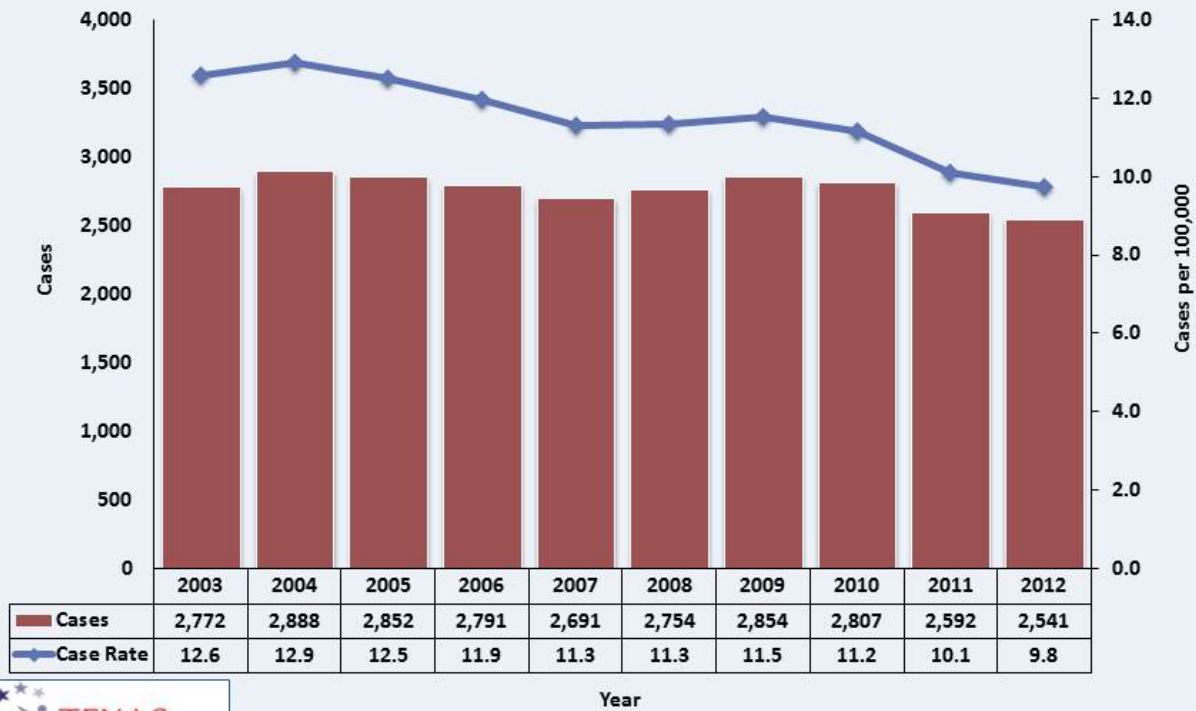


Chart 24b: 2003-2012 TX AIDS Cases and Case Rates by Year

People Living with HIV/AIDS by Sex, Race/Ethnicity, and Age Group, 2012

Through December 31, 2012		
	People Living with HIV	
	Cases	Rate*
Sex		
Male	56,952	456.6
Female	15,980	126.1
Total	72,932	
Race		
White	21,432	184.8
Black	27,352	921.2
Hispanic	21,447	226.7
Other	691	61.9
Unknown	2,010	
Age Group**		
0 - 9	132	3.4
10 - 14	166	8.8
15 - 19	552	29.3
20 - 24	3,251	178.9
25 - 29	5,543	299.1
30 - 34	7,522	427.3
35 - 39	8,631	489.4
40 - 44	10,916	644.1
45+	36,219	419.4
Total	72,932	290.0

* Rates represent cases per 100,000 population.
 ** Age as of December 31, 2012



Chart 24c: 2012 Texans Living with HIV Demographics

HIV Housing Need (HOPWA Grantees Only)

Type of HOPWA Assistance	Estimates of Unmet Need
Tenant based rental assistance	32
Short-term Rent, Mortgage, and Utility	45
Facility Based Housing (Permanent, short-term or transitional)	0

Table 25 – HIV Housing Need

Data Source: HOPWA CAPER and HOPWA Beneficiary Verification Worksheet

2013 HOPWA Unmet Need (Waitlists)

At the end of the 02/01/2013-01/31/2014 Texas HOPWA program year, the total number of households that had unmet subsidy assistance need was 135. Of the 135, 103 are on TBRA waitlists and 32 on STRMU waitlists. This data is from project sponsors reported on the Texas 2014 Consolidated Annual Performance and Evaluation Report ("CAPER").

Describe the characteristics of special needs populations in your community:

Colonia Residents: Characteristics described in Needs Assessment Section 30.

Elderly Persons and Frail Elderly: Incidences of disability increase with age. From 2008-2012, 10% of persons between 18 and 64 years old had a disability, while 41% of persons 65 and older had a disability (American Community Survey, Table S1810). Second, older households tend to live in older homes: 65.2% of households aged 50 years and older live in housing stock built before 1970 (Harrell and Houser, 2011).

Homeless persons and Persons at Risk of Homelessness: According to the 2012 HUD Annual Assessment Report to Congress, most homeless Americans (63%) were single persons and 37% were families. Minorities made up approximately 60% of the sheltered homeless population in 2011. The sheltered homeless were also overwhelmingly male at 63% (pp. 15, 18-20).

Farmworkers: Farmworker housing can consist of run-down apartments, overcrowded conditions, families forced to share limited housing, and families living in shacks, barns, outdated trailers or camping along riverbanks or in orchards (Bowen National Research, 2012, page VIII-12). Farmworkers also face problems of needing short-term rentals, as the farmworkers migrate with the crops (page II-5).

Persons with Alcohol and Substance Use Disorders: Persons experiencing persistent homelessness were also more likely than persons not experiencing homelessness to have been an inpatient in a drug/alcohol treatment center in their lifetime (Myrstol and Fitzpatrick, 2011, page 540-542).

Persons with Disabilities (Mental, Physical, Intellectual, and Developmental): Characteristics discussed in Market Analysis Section 35.

Persons Living with HIV/AIDS and Their Families: Characteristics discussed in Market Analysis and other questions in this section.

Public Housing Residents and Persons on Public Housing Wait Lists: Public housing residents often face barriers such as low educational attainment, poor mental and physical health, social networks without access to jobs, and physical isolation from opportunity (Theodos, Popkin, Parilla, Getsinger, 2012).

Veterans: In a recent study of homeless veterans, 60% had a substance use disorder (Tsai, Kaspro and Rosenheck, 2013). In addition, as many as two-thirds of homeless veterans of the Iraq and Afghanistan wars had post-traumatic stress disorder (DeAngelis, 2013). These factors may affect homeless and non-homeless veteran's ability to acquire stable housing.

Victims of Domestic Violence: Domestic violence is one of the leading causes of housing instability, which includes skipping meals to pay rent, doubling up with family or friends, and being threatened with eviction. Some victims of domestic violence face barriers of employment, such as reentering the workplace with limited work experience, and facing abusers who sabotage the victim's ability to hold a job, including stalking and causing loss of hours worked (Baker, Billhardt, Warren, Rollins, and Glass, 2010, page 431).

Youth Aging Out of Foster Care: Studies have found that youth aging out of foster care are less likely than their peers who have not been in foster care to graduate high school or be employed at a job that can support their basic necessities. Nationwide, as many as one out of every four youth who age out of care experience homelessness (Casey Family Programs, 2008).

What are the housing and supportive service needs of these populations and how are these needs determined?

The needs of people with special needs were gathered by various studies, by workgroups and stakeholder feedback, as listed in the Process Chapter and Bibliography.

Colonia Residents: The housing and supportive needs of colonia residents are described in Needs Assessment Section 30.

Elderly Persons and Frail Elderly: The higher incidences of disability may increase the need for housing modifications for accessibility. The greater likelihood that elderly persons live in older housing may increase the need for home repair.

Homeless Persons and Persons at Risk of Homelessness: The housing needs of homeless persons and persons at risk of homelessness are described in Needs Assessment 10.

Farmworkers: Farmworkers housing needs stem from their low incomes, their movement patterns and their limited English proficiency.

Persons with Alcohol and Substance Use Disorders: Without secure housing, persons with alcohol or substance use disorders can cycle through costly options such as emergency room care and the criminal justice system (U.S. Department of Housing and Urban Development, 2011). Supportive housing, such as Housing First, for persons with alcohol and/or other substance use disorder range from short-term, in-patient services to long-term, drug-free housing for recovering addicts.

Persons with Disabilities (Mental, Physical, Intellectual, and Developmental): Inaccessible housing continues to be a concern; general market samples completed for the Phase 2 AI suggest that over 227,000 disabled households are living in housing that is not meeting their accessibility needs. Needs for neighborhood and community improvements that would allow for access to employment opportunities, health services, community amenities, and public transportation were also noted. HHSCC's 2014-2015 Biennial Plan found that long-term services and supports, Medicaid waiver services or home modifications could be needed to keep this population housed.

Persons with HIV/AIDS and their Families: Needs and services are discussed in Market Analysis Section 35.

Public Housing Residents and Persons on Public Housing Wait Lists: One study found that supportive services, such as employment services, rent incentives and community support for work, help public housing residents move toward self-sufficiency (Theodos, Popkin, Parilla, Getsinger, 2012). The needs of persons on public housing wait lists are likely similar to the discussion found in Needs Assessment 10 regarding people with low income.

Veterans: The housing issues of veterans can be compounded by service-connected disabilities, such as traumatic brain injury, substance abuse problems and mental illness (National Housing Conference and Center for Housing Policy, 2013). Providing affordable housing with services to treat these conditions may create more stability for veterans.

Victims of Domestic Violence: Any assistance needs to address the safety of the victim of the domestic violence. The National Advisory Council on Violence Against Women recommends that safety and housing stability should be addressed at the same time. Victims of domestic violence need a broad range of housing options for varying family compositions (Baker, Billhardt, Warren, Rollins, and Glass, 2010, page 437).

Youth Aging Out of Foster Care: A 2010 survey of Texas foster youth found that 16% have experienced homelessness (Texas Department of Family and Protective Services, 2011). Foster care alumni may benefit from affordable housing tied with other services, such as education, financial literacy, and services to facilitate connections for emotional support.

Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:

Persons with HIV are more vulnerable to becoming homeless. Stable housing not only reduces homelessness risk, but results in reduced HIV transmission and improved health outcomes. At the end of 2012, nearly 73,000 people in Texas were known to have HIV. It is estimated that an additional 16,118 people in Texas are living with HIV, but are currently unaware of their status. The number of Texans living with HIV increases each year and there have been approximately 4,300 new HIV diagnoses and 930 deaths among PLWH per year since 2008 (DSHS, 2014).

Within DSHS, the Epidemiology and Surveillance Branch collects and reports on HIV in Texas. The following facts are taken directly from the current statistics of the HIV/AIDS epidemic in Texas based on data reported in the 2012 Texas STD and HIV Integrated Epidemiologic Profile ("Epi Profile") (DSHS, 2014).

- At the end of 2012, there were 72,932 Texans living with a diagnosed HIV infection
- The number of Texas HIV cases continues to rise each year
- The number of reported PLWH in Texas increased by 24% between 2008 and 2012
- More than 3/4 of PLWH live in one of Texas major metropolitan areas: Austin, Dallas, Houston, Fort Worth, and San Antonio. About 1/3 of PLWH live in Houston and about 1/4 in Dallas. Austin, Fort Worth, and San Antonio combined accounted for 20% of PLWH in Texas in 2012
- In 2012, the majority of PLWH were racial and ethnic minorities with 38% of the living cases among Blacks and 29% among Hispanics
- Minorities made up most of the new HIV diagnoses in 2012 with Black and Hispanic Texans comprising about 38% and 36%, respectively

- Among men diagnosed in 2012, Hispanics make up almost 40% and Blacks about 33% of new cases
- Among women diagnosed in 2012, Blacks made up 59% of the cases
- For every female diagnosed with HIV in 2012, there were more than three males diagnosed and this ratio has remained constant over the past decade
- Most PLWH are between 35 and 55 years old, and as people with HIV live longer, the average age of PLWH also rises
- The age group with the highest increase in new diagnoses are young people, age 15-24 years old
- Blacks of both sexes experienced a disproportionately higher rate of deaths due to HIV, at more than three times the overall state rate, and five times that of Hispanics or Whites.
- In 2011, Texas had the 8th highest rate of new HIV diagnoses in the nation

The 2012 Texas STD and HIV Integrated Epi Profile states heightened rates of STD and HIV are seen in youth, racial/ethnic minorities, particularly Blacks, and gay men and other men who have sex with men ("MSM"). These groups are clearly more vulnerable to STDs and HIV on scales that have tremendous financial and social costs for Texas, and serious implications for the future health and well-being of persons living with these conditions (DSHS, 2014). In 2013, about 72-73% of HOPWA clients were racial/ethnic minorities in Texas, which includes 31% of total HOPWA clients who were Black (282), 40% Hispanic/Latino, and 2% other non-White. Additionally, 60% were male and 40% female clients. Texas HOPWA assists a historically vulnerable and underserved population. At the end of the 2013 project year, there were 135 clients on wait lists. The total number of clients on wait lists increased from 96 in 2012 to 135 in 2013, which is a 41% increase. Many clients assisted with long-term rental assistance are dependent on HOPWA for extended periods of time because they are unable to transition to other affordable and stable housing for many reasons, which can prevent new clients from receiving assistance, and contribute to extended waitlists.

Discussion:

This section has established the characteristics of several special needs populations. At least one program will have specific outreach or added points for serving each special needs category. Serving special needs populations is described in Action Plan Section 25.

Texas HIV clients continue to face many challenges. Racial and ethnic minorities are disproportionately affected by HIV and 25% of Blacks and Hispanics in Texas are below the federal poverty level. Texas HIV clients are additionally impacted by a lack of access to medical insurance/assistance. According to the U.S. Census Bureau, Texas still tops the nation for the highest rate of uninsured (23.8%), which means one in four Texans did not have insurance in 2011 (Current Population Survey: Annual Social and Economic Supplement, Table H106). DSHS estimates that 28% of health program beneficiaries are categorically ineligible for Medicaid or Medicare coverage due to citizenship. Texas Medicaid currently only covers children, pregnant women, and certain disabled adults up to 100% of the Federal Poverty Level ("FPL"); the majority of HIV clients are males. Due to the restrictive eligibility of the Texas Medicaid program, most HOPWA clients are excluded from Medicaid coverage. At this time, Texas is not expected to expand Medicaid, and citizens under 100% of FPL and non-citizens will not be eligible for subsidies to support purchase of insurance in the federal marketplace. Even after implementation of the Affordable Care Act ("ACA"), it is likely that more than 20% of HOPWA clients will not have insurance or access to medical assistance.

The Texas HOPWA program serves the State of Texas either directly in most counties, or as a wrap-around for remaining counties in the six MSAs that receive direct HOPWA funding from HUD. As a result, the state program serves all of the rural, less-populated areas of the state. The majority of Texas HOPWA program clients are at 30% or less of household AMI. The Texas HOPWA program addresses the unmet housing services needs of PLWH and their families in Texas by providing housing assistance and supportive services to income-eligible individuals. In addition to the DSHS statewide HOPWA program, the MSAs of Austin, Dallas, El Paso, Fort Worth, Houston, and San Antonio receive HOPWA funds directly from HUD and serve the counties assigned under those MSAs.

Several consultations for the 2015-2019 State of Texas Consolidated Plan resulted in more information about specific populations' needs. The Texas Juvenile Justice Department ("TJJD") emphasized the difficulties that youth aged 17 to 19 years encounter when discharged from TJJD facilities. According to TJJD, many of the youth have little or no family support and often have limited vocational skills. Some youth exiting TJJD facilities require housing with services, such as mental health services. Finally, many property owners do not rent to persons on the sexual offender registry. While youth exiting a TJJD facility are not a specific special need, some of the youth may fall under another special need category, such as persons with disabilities or youth aging out of foster care, if the youth has been in the foster care system.

Finally, the Trans Pride Initiative recommended that lesbian, gay, bisexual, transgender, intersex, and queer/questioning ("LGBTIQ") persons should be considered as being a special needs population. At this time, LGBTIQ persons will not be added as a unique special needs population. Although TDHCA thinks that such LGBTIQ persons' housing needs should be covered by their status under other special needs groups, TDHCA will continue to monitor this issue.

NA-50 Non-Housing Community Development Needs - 91.315 (f)

Describe the jurisdiction's need for Public Facilities:

CDBG recognizes the importance for public facility projects; however, it does not represent a large percentage of the applications received or the funds dispersed. Given the importance of public facilities, CDBG is developing the Community Enhancement Fund which funds community facility projects and/or renewable energy projects that benefit all citizens within the jurisdiction. This fund can be used for a wide range of projects including community centers to serve as shelters during the aftermath of disaster events.

Reliable community infrastructure provides the foundation for economic and community development. Distance and density issues have a significant impact on the ability of a rural community to address infrastructure needs due to revenue concerns and economies of scale.

Community infrastructure includes water and wastewater systems, roads/ streets, and other utilities. These services are fundamental for families and businesses to choose to live, work and stay in an area — urban or rural.

The CDBG Program encourages the use of its funds to not only improve existing locations, but to also provide facilities to accommodate residential opportunities that will benefit low- and moderate-income persons. CDBG places a high priority on ensuring rural Texas has access to basic infrastructure including water, sewer, and roads.

CDBG also places a high priority on economic development and capacity building. Through the Texas Capital Fund program, CDBG funds are leveraged with private and local investment to create jobs in rural Texas.

The Planning and Capacity Building Fund allows communities to use CDBG funds to develop base mapping and a comprehensive plan that outlines current and future development priorities within the community.

How were these needs determined?

Requests for funding for public facilities do not represent a large percentage of the applications received or the funds dispersed, however several successful CDBG grants have recently provided much needed community centers, fire stations, and other public facilities in rural communities. The 2013 Texas Rural Impact Report also identified public facilities as a need in rural Texas.

The Community Development Fund ("CD") is the largest fund and allows communities to request funds for diverse projects. Under CD, each region through its Regional Review Committee ("RRC"), establishes its funding priority through scoring factors that reflect local prioritization of need. The RRCs have the opportunity to revise its local priorities before each cycle.

In line with CDBG priorities, the majority of RRCs prioritize public improvement projects. CDBG recognizes the importance for public facility projects; however, it does not represent a large percentage of the applications received or the funds dispersed. Given the importance of public facilities, CDBG is

developing the Community Enhancement Fund which funds community facility projects and/or renewable energy projects that benefit all citizens within the jurisdiction. This fund can be used for a wide range of projects including community centers to serve as shelters during the aftermath of disaster events.

Under the Texas Capital Fund ("TCF"), TDA focuses on job creation and/or retention primarily for low to moderate income persons and areas above the national average of unemployment and poverty. TCF funds private (loan) and public (grant) infrastructure and real estate improvements to attract private capital investment in rural Texas.

The table below illustrates the community development fund application requests for the 2013-2014 CDBG program years. Requested amounts include public improvements, public facilities, and economic development. Public services are an eligible use of CDBG funds; however, CDBG has not received a request to fund public services in several years.

Based on the applications received (shown in the table below), the most requested activities are water, sewer, and street facilities. These three activities made up 67% of the total amount requested, which was \$208,538,879.

Activity	Amount Requested
Water Facilities	\$75,253,323
Sewer Facilities	\$49,439,830
Street Improvements	\$14,229,037
Rehabilitation of Private Properties (sewer service)	\$5,054,202
Flood and Drainage Facilities	\$2,517,213
Rehabilitation of Private Properties	\$0
Rehabilitation of Private Properties (water service)	\$928,154
Neighborhood Facilities/Community Centers	\$294,551
Parks, Playgrounds and Other Recreational Facilities	\$912,238
Fire Protection Facilities and Equipment	\$517,776
Clearance/Demolition Activities	\$590,000
Acquisition	\$634,803
Economic Development for Profit	\$9,244,900
Other Eligible Activities	\$269,772
Planning & Urban Environmental Design	\$1,522,685
Senior Centers	\$644,300
Sidewalks/Other Public Facilities	\$9,435,221
General Administration	\$15,467,900
Engineering/Architectural Services	\$21,582,974

Table 26 - Requests for Community Development Program Funds for 2013-2014 by Activity

Describe the jurisdiction’s need for Public Improvements:

Reliable community infrastructure provides the foundation for economic and community development. Distance and density issues have a significant impact on the ability of a rural community to address infrastructure needs due to revenue concerns and economies of scale.

Community infrastructure includes water and wastewater systems, roads/ streets, and other utilities. These services are fundamental for families and businesses to choose to live, work and stay in an area — urban or rural.

CDBG encourages the use of its funds to not only improve existing locations, but to also provide facilities to accommodate residential opportunities that will benefit low- and moderate-income persons. CDBG places a high priority on ensuring rural Texas has access to basic infrastructure including water, sewer, and roads.

CDBG also places a high priority on economic development and capacity building. Through the Texas Capital Fund program, CDBG funds are leveraged with private and local investment to create jobs in rural Texas.

The Planning and Capacity Building Fund allows communities to use CDBG funds to develop base mapping and a comprehensive plan that outlines current and future development priorities within the community.

How were these needs determined?

The Community Development Fund ("CD") is the largest fund and allows communities to request funds for diverse projects. Under CD, each region through its Regional Review Committee ("RRC"), establishes its funding priority through scoring factors that reflect local prioritization of need. The RRCs have the opportunity to revise its local priorities before each cycle.

In line with CDBG priorities, the majority of RRCs prioritize public improvement projects. Based on the applications received, the most requested services are water, sewer, and street services. These three activities made up 67% of the total amount requested.

Describe the jurisdiction's need for Public Services:

The need for public services exists in rural communities but is far outweighed by the need for public infrastructure. Many areas simply lack service providers to deliver public services to these residents.

How were these needs determined?

Public services are an eligible use of CDBG funds, but CDBG has not received a request to fund public services in several years. However, Colonia Self Help Centers ("SHCs") provide public services as needed.

Based on the needs Analysis above, describe the State's needs in colonias.

In 2010, the Texas Secretary of State's Office identified the primary challenges facing colonias in its Senate Bill 99 Report to the 82nd Texas Legislature.

Water and Sewer Systems: some colonias lack access to safe drinking water and waste management, forcing residents to depend on the bulk transport of water and use non-potable water for some needs. Rural Texas heavily depends on private wells and some groundwater is unsafe for long-term consumption. A colonia's ability to connect to a public water or waste water collection system is

affected by multiple factors, some of which are out of a household's control. Factors include: dwelling's distance from a service area; dwelling's compliance with the local building codes; local institutional capacity or resources to develop and execute projects; local institutional ability to dedicate utility easements necessary for project completion; the investment associated with the planning, construction, connection and billing of utilities; and the limited availability of grants or loans.

Drainage and Paved Roads: Many colonias are situated on land that was primarily used for agricultural purposes or is otherwise unsuitable for residential use because of inadequate drainage. Rainfall presents significant challenges when informally constructed dwellings and roads supersede the drainage capacity of the land. Streets can eventually become unsuitable for everyday access by residents, school buses and emergency vehicles. In addition, in many colonias, road and utility easements were undefined when the land was originally sold, which creates complications and delays for road and utility projects.

Solid Waste Services: Some colonias lack the services with which to legally dispose of household solid waste. The accumulation of garbage can encourage vermin or lead to illegal and dangerous disposal methods, such as burning.

Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

The Market Analysis Chapter inventories the State's available housing and affordable housing. Several factors are examined, each in a different section.

Market Analysis Section 10 examines the types of properties being built compared to the demand for such properties, the income levels of families targeted with public funding, and the loss of inventory of affordable housing.

Market Analysis Section 15 examines the costs of housing compared to incomes, including the Housing Affordability Index and market trends. Local economic forces are also discussed in relation to housing costs.

Market Analysis Section 20 examines the age of the housing stock, including lead-based paint concerns in housing built before 1978, as well as vacant units and need for housing rehabilitation. Lead based paint is especially dangerous for children, who often put hands and objects into their mouths. Lead poisoning can lead to developmental disorders.

Market Analysis Section 30 examines the availability of homeless facilities and services for persons experiencing homelessness.

Market Analysis Section 35 examines the availability of housing and services for persons exiting institutions and persons with special needs. The State has several programs to address these populations; some housing is paired with services and some services are independent from housing.

Market Analysis Section 40 examines barriers to affordable housing. This section focuses on fair housing issues.

Market Analysis Section 45 examines Community Development Assets.

Market Analysis Section 50 examines concentrations of housing problems and minorities. Fair housing issues are also addressed in this section.

This Chapter's many facets of analysis better equip Texas to target funds in an effective and efficient manner.

MA-10 Number of Housing Units – 91.310(a)

Introduction

Texas is the second largest state in the nation, the second most populous state, and is growing at a much faster rate than the nation as a whole. The American Community Survey 2008 and 2012 1-year estimates (Table DP02) found that the United States population was growing at 3% while Texas was growing at 7% during that five year period. With this kind of growth, both new development and redevelopment is occurring in the diverse landscape of Texas. Growth is not uniform across the State, and the concentration of growth is discussed in Market Analysis Section 15.

All residential properties by number of units

Property Type	Number	%
1-unit detached structure	6,371,004	66%
1-unit, attached structure	250,449	3%
2-4 units	512,044	5%
5-19 units	1,123,694	12%
20 or more units	697,808	7%
Mobile Home, boat, RV, van, etc	763,471	8%
Total	9,718,470	100%

Table 1 – Residential Properties by Unit Number

Data Source: 2006-2010 ACS

Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	19,551	0%	76,295	3%
1 bedroom	101,903	2%	914,919	30%
2 bedrooms	799,469	14%	1,136,532	38%
3 or more bedrooms	4,616,265	83%	874,272	29%
Total	5,537,188	99%	3,002,018	100%

Table 2 – Unit Size by Tenure

Data Source: 2006-2010 ACS

Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.

The State of Texas works with federal and local entities in order to effectively reach populations in need. The Texas Department of Housing and Community Affairs ("TDHCA") annually reports the number of units assisted through the U.S. Department of Housing and Urban Development ("HUD"), public housing authorities ("PHAs"), Section 8 Housing Choice Vouchers, the U.S. Department of Agriculture ("USDA"), and Housing Finance Corporations ("HFCs") in its State Low Income Housing Plan and Annual Report. A copy of the most current report can be found online at <http://www.tdhca.state.tx.us/housing-center/pubs-plans.htm>. Information on local affordable housing or shelters units and targeting are often required of subgrantee program applicants, such as for Emergency Solutions Grant ("ESG") Program or HOME Investment Partnerships ("HOME") Program. Using these data sources, applications can create appropriate targets and show opportunities for leveraging.

Rider 5 of the 2014-2015 state biennial appropriation to TDHCA requires TDHCA to focus funding toward individuals and families that are earning less than 60% of the Area Median Family Income ("AMFI"). Rider 5 directs TDHCA to apply at least \$30,000,000 of the funds available from the Housing Trust Fund, HOME Program, Section 8 Housing Choice Voucher ("HCV") Program, and Housing Tax Credit ("HTC") Programs towards individuals and families earning no more than 30% AMFI and no less than 20% of these programs' funds towards households and individuals earning >30%-60% AMFI. (See General Appropriations Act, 83rd Leg., R.S., S.B. 1, Ch. 1411, art. VII-1, available at <http://www.lbb.state.tx.us>) The latest Rider 5 report can be found in the annual publication: State Low Income Housing Plan and Annual Report found on TDHCA's website. The 2013 Rider 5 report shows that \$50,672,983 was targeted toward housing assistance for people at no more than 30% AMFI. This is well above the \$30 million goal in the rider. In addition, 60% of funding went toward housing assistance for people earning between >30-60% AMFI. Again, this is well above the 30% goal in the rider.

In addition, HOME and several other TDHCA programs strive to serve lower-income individuals and households that reside in areas that do not receive direct funding or capital from the federal government, such as rural areas or areas not in a Participating Jurisdiction ("PJ"). The needs of rural areas are considered in the development of programs and in the distribution of funds. Special considerations with respect to the implementation of scoring criteria or set-asides have been added to program rules and policies to encourage the participation of these areas.

Finally, TDHCA has several special needs populations that receive priority in its programs. Some of these populations were already discussed in the Needs Assessment. Special needs populations may include the elderly, frail elderly, persons with disabilities, persons with alcohol or other drug addiction, persons with HIV/AIDS, persons with Violence Against Woman Act ("VAWA") protections (domestic violence, dating violence, sexual assault, or stalking), colonia residents, farmworkers, homeless populations, veterans, wounded warriors (as defined by the Caring for Wounded Warriors Act of 2008), and public housing residents. Plans to meet these special needs are found in the Action Plan, Sections 15, 25 and 65.

Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.

For TDHCA units, the rental affordability periods vary based on program type, commonly ranging from 15 to 40 years. When analyzing current inventory and affordability periods, 18% of TDHCA's inventory is scheduled to expire within the next 15 years. Out of 212,447 active affordable units currently subject to affordability restrictions, 1,694 are scheduled to expire in zero to five years from now; 14,478 are scheduled to expire in six to 10 years; and 21,364 are scheduled to expire in 11 to 15 years. However, the rental properties could potentially extend their affordability periods if they apply for additional funding from TDHCA. This practice is common under the at-risk set-aside in the 9% HTC Program.

Does the availability of housing units meet the needs of the population?

The available housing units do not meet the needs of a large part of the Texas population. According to the Needs Analysis Section 10, approximately 48% of the households in Texas are small families of two and approximately 24.9% of households are single persons. However, 97% of the housing units for owners and 67% of the housing units for renters are 2 or more bedrooms. Because larger units are associated with higher costs, a majority of housing units are too costly for a large part of the population that could use smaller units, as evidenced by the high cost burden problems. Please note that the Table 2 describing Unit Size by Tenure, the total does not equal 100% most likely as a result of rounding issues.

When looking at the Texas A&M Real Estate Center ("the Center") building permit data for the 10-year period between 2002 and 2012, it becomes apparent that permits for single family housing have been decreasing, becoming almost equal to permits for multifamily properties. There was a decrease of 33% for new permits for single family housing; however, to put this decrease in context, Texas' single family permits were decreasing at approximately half the rate of the nation, which decreased 61% during this period. There was also a decrease of 65% for 2-4 unit permits during this time period, which is about the same as the decrease nationwide. However, there was an increase of 51% for 5+ unit permits in Texas, which is opposite the trend of the nation which saw a drop of 18%. The ratio of single family to multifamily units decreased from 2.9 single family permits for every 1 multifamily permit in 2002, to 1.5 single family permit for every 1 multifamily permit in 2012.

There is also a general shortage of housing in Texas. According to the Center, in January 2014 there was only a 3.3 month inventory of housing for sale, which was the lowest supply since 1990.

Finally, there are unmet housing needs for populations with special needs, such as Persons with Disabilities. While there is no Texas-specific data, the American Housing Survey 2011 Table S-02-00 estimates that, in the South, out of approximately 42,584,000 units, 4,785,000 of the households living in the units reported having a disability. This represents approximately 11% of the households with a disability, which is consistent with the percentage of Texans with a disability in the American Community Survey Table S1810 in the Needs Assessment Section 10. Also per the Needs Assessment, approximately 6% of the population had an ambulatory disability. According to the American Housing Survey, only 180,000 units had ramps, which is .4% of the units. This is dramatically lower than the percentage of the populations which may need such assistance.

Describe the need for specific types of housing:

Because the majority of families consist of two persons and approximately 25% of households consist of one person, and given that cost burden is the biggest housing problem, it follows that the type of housing that is not adequately provided consists of efficiencies and one bedroom units. These units

would not result in crowding issues for these households. Furthermore, if cost correlates with size, these units would be more affordable. This would help address cost burden, which is experienced by 23.9% of households with incomes under 100% AMI, and severe cost burden which affects 24.9% of households under 100% AMI.

To adequately serve households with special needs specified in Needs Assessment Section 40, different types of housing may be needed. For example, for persons who were formerly homeless, single-resident occupancy ("SRO") housing could be a cost-effective way to provide affordable housing for single adults. However, the State recognizes that SROs may not be suitable for all special needs populations.

The data also indicates that there is a lack of housing accessible for persons with disabilities, which is corroborated by the consultations for the 2015-2019 State of Texas Consolidated Plan. A Regional Partnership Specialist with the Health and Human Services Commission ("HHSC") communicated that there are wait lists up to two years long for accessible apartments. The commenter stated that the aging baby boomer generation will increase need for accessible housing. In addition, the 2-1-1 Texas Information and Referral Service for South Central Texas communicated that 2% of the housing-related needs were for housing for people with special needs. Of this category, 32% of callers were seeking Assisted Living Facilities, and 20% of callers were seeking Semi-Independent Living Residences for Adults with Disabilities.

A consultation with Texas Juvenile Justice Department ("TJJD") called for transitional housing for youth exiting TJJD facilities. These facilities would ideally be paired with case management, and include vocational training through the Texas State Technical College System. While this type of supportive housing would involve multiple funding sources and inter-agency collaboration, it would address the needs of many of the youth aged 17-19 released from TJJD facilities described in Needs Assessment Section 45.

Through other consultations, the State is aware of the housing needs of single parents with children. The Inclusive Communities Project specifically mentions the need for families with children, including single mothers. A resident in Henderson County also expressed the need for housing for women and children, saying that she knows of homeless high school students. Housing for women, children, and single parents require housing units with more than one bedroom; while this unit type is generally plentiful in most markets, their affordability is more challenging since there is only one income supporting the whole unit cost.

A Henderson County resident, a Regional Partnership Specialist with HHSC, and a Director of Patient Education and Enrollment at the Esperanza Health and Dental Center in San Angelo discussed the need for emergency shelters for women and children. The Regional Partnership Specialist also described the lack of shelters for victims of domestic violence, including victims of sex trafficking.

Although Section 8 Housing Choice Vouchers ("HCVs") are not specific housing types, the Inclusive Communities Project noted the need for more landlords to accept HCVs.

Finally, while the discussion above does not include locations of housing, the Inclusive Communities Project stressed the need for housing "outside racially-segregated areas of slum and blight." This issue will be addressed in Strategic Plan Section 55.

Discussion

Texas has strict standards for affordability. Even though federal limits for the programs can reach 80% of AMI, Rider 5 (as discussed above) directs housing assistance to households at 0-60% AMI, with a priority on those making 30% or less AMI. The State also focuses a majority of its HOME funding into rural areas. In this way the State's HOME funds can reach areas without HOME funds of their own.

In Texas, there is not sufficient affordable housing nor sufficient housing stock in general. This need for more housing could be a reason that there has been a shift in Texas from 1-unit detached structures to large multifamily developments; multifamily developments serve more people in a smaller space. Additionally, the low rates of housing inventory could indicate homebuyer demand and, because of the income distribution and costs of housing illustrated in Market Analysis 15, down payment assistance could also be in demand. Several public comments indicated demand for down payment assistance in the Rio Grande Valley, including Hidalgo and Cameron counties, in Rockwall, and in Paris. The Rio Grande Valley is in the South Texas Border region, Rockwall is in the Metroplex region, and Paris is in the Upper East Texas. More details about each region can be found in the State Low Income Housing Plan and Annual Report, which is updated annually and available online at <http://www.tdhca.state.tx.us/housing-center/pubs-plans.htm>.

Finally, there is a need for housing that is appropriate for special needs populations, such as Persons with Disabilities. By understanding which type of housing is lacking, the State can better direct funding into activities to serve the population. Further, the evaluation of substandard housing stock in Market Analysis Section 20 will warrant consideration in programming activities.

MA-15 Cost of Housing – 91.310(a)

Introduction

Housing affordability remains a significant problem for many low-income families. A report by the National Low Income Housing Coalition found that in no county in the U.S. can a person afford a one-bedroom unit at the local Fair Market Rent ("FMR") when working full time at the minimum wage. On average in Texas, an individual would need to earn \$16.77 an hour in metro areas and \$13.07 an hour in non-metro areas with a forty hour workweek to afford a two-bedroom apartment at FMR. The minimum wage under the federal Fair Labor Standards Act is \$7.25 (National Low Income Housing Coalition, 2014, pp. 4, 198).

As the discussion of Housing Mismatch will illustrate, the majority of market-rate affordable housing is often occupied by persons in higher income levels. In addition, estimates of affordable housing supply by income category can be somewhat inflated. This is because affordability is computed for households at the top of each income range, meaning that households in the lower part of the income range would have to pay more than 30% of their income for some of the units which are considered affordable to them.

For a variety of reasons, affordable housing is not available to many low-income families. Major reasons include housing size mismatches, the unequal geographic distribution of affordable housing units, and limitations on the supply of affordable housing because of occupation by higher income groups.

Finally, housing and transportation are often the largest parts of a household's budget. Households that live near employment, shopping, restaurants, and other amenities can reduce their transportation costs by 10-16%. As the U.S. Department of Transportation reports, "While 69 percent of communities are affordable under the conventional definition (housing costs < 30 percent of income), only 39 percent are affordable using a comprehensive definition (combined housing and transportation costs < 45 percent of income)." While housing may be more expensive in city centers or near transit, the combined costs of housing and transportation in some cases may actually be lower in these areas than in suburbs or more rural areas that are auto-dependent (n.d., pg 1-2). However, due to the complexity of transit systems and lack of comprehensive data, the analysis below focuses only on cost of housing and income.

Cost of Housing

	Base Year: 2000	Most Recent Year: 2010	% Change
Median Home Value	77,800	123,500	59%
Median Contract Rent	490	625	28%

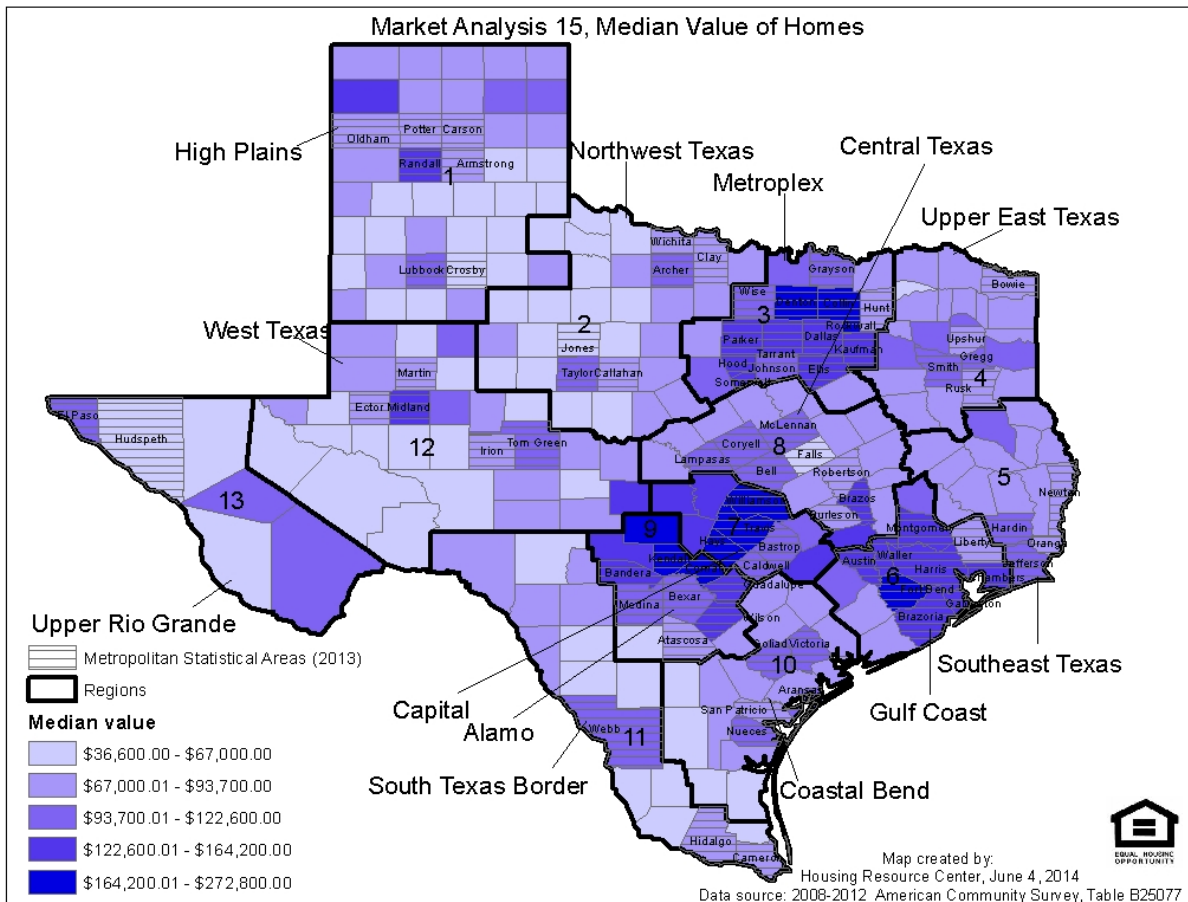
Table 3 – Cost of Housing

Data Source: 2000 Census (Base Year), 2006-2010 ACS (Most Recent Year)

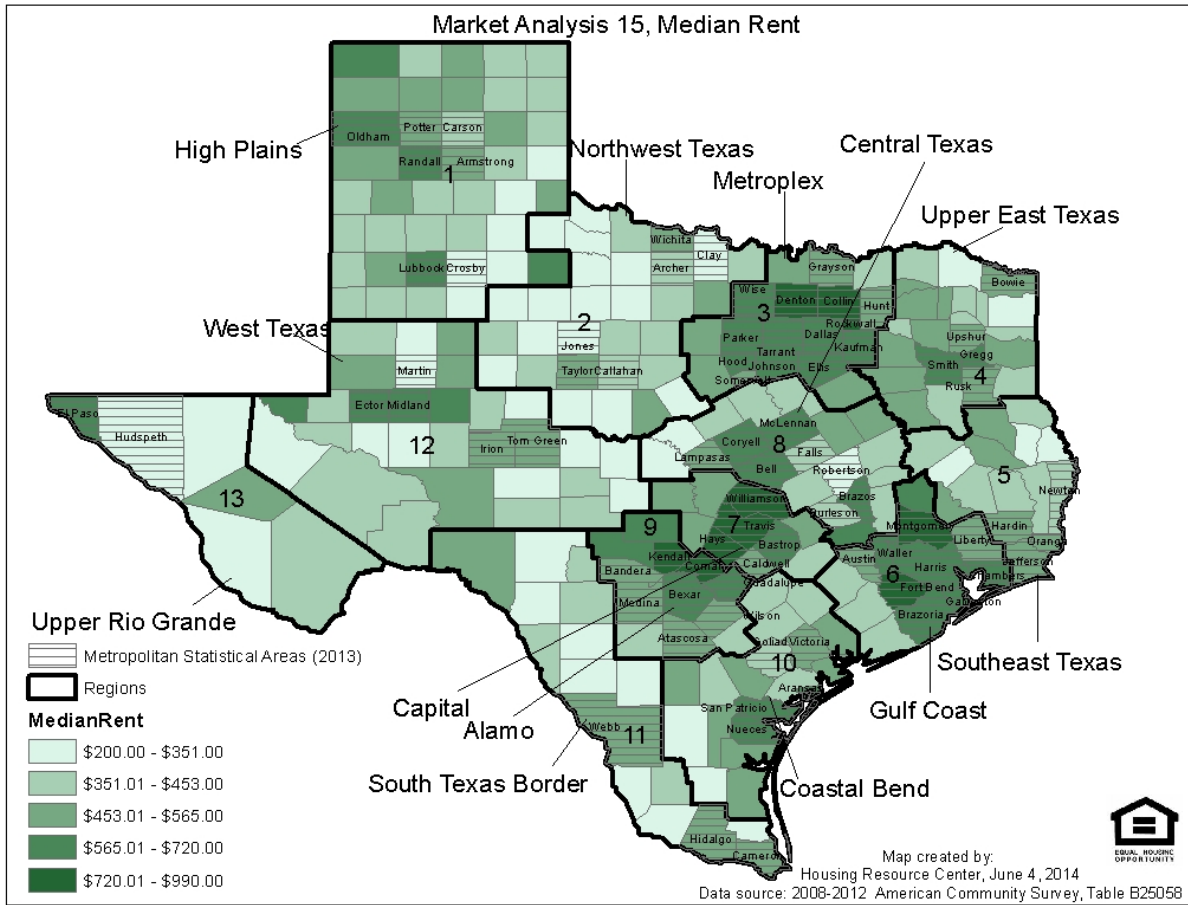
Rent Paid	Number	%
Less than \$500	997,986	33.3%
\$500-999	1,650,455	55.0%
\$1,000-1,499	273,985	9.1%
\$1,500-1,999	51,650	1.7%
\$2,000 or more	27,942	0.9%
Total	3,002,018	100.0%

Table 4 - Rent Paid

Data Source: 2006-2010 ACS



Map 4a – Median Value



Map 4b – Median Rent

Housing Affordability

% Units affordable to Households earning	Renter	Owner
30% HAMFI	173,180	No Data
50% HAMFI	712,975	570,265
80% HAMFI	1,919,695	1,449,645
100% HAMFI	No Data	2,004,945
Total	2,805,850	4,024,855

Table 5 – Housing Affordability

Data Source: 2006-2010 CHAS

	Renters earning 0-30% AMI	Renters earning >30-50% AMI	Renters earning >50-80%	Renters earning >80-100%	Renters earning >100%
Rental affordable to households making 0-30% AMI	151,515	58,650	47,745	19,415	48,625
Rental affordable to households making >30-50% AMI	178,575	149,060	132,535	48,570	80,510
Rental affordable to households making >50-80% AMI	271,225	273,195	367,635	192,865	422,310
Rental affordable to households making >80%+ AMI	52,650	42,990	72,905	52,775	283,730

Table 5a - Housing Mismatch – Renters

	Owners earning 0-30% AMI	Owners earning >30-50% AMI	Owners earning >50-80%	Owners earning >80-100%	Owners earning >100%
Home value affordable to households earning 0-50% AMI	235,260	304,260	439,145	245,860	790,405
Home value affordable to households earning >50-80% AMI	76,780	110,930	224,300	180,700	1,185,350
Home value affordable to households earning >80-100% AMI	18,245	22,815	43,520	35,625	437,260
Home value affordable to households earning 100%+ AMI	32,775	34,335	65,715	52,830	959,590

Table 5b - Housing Mismatch - Owners

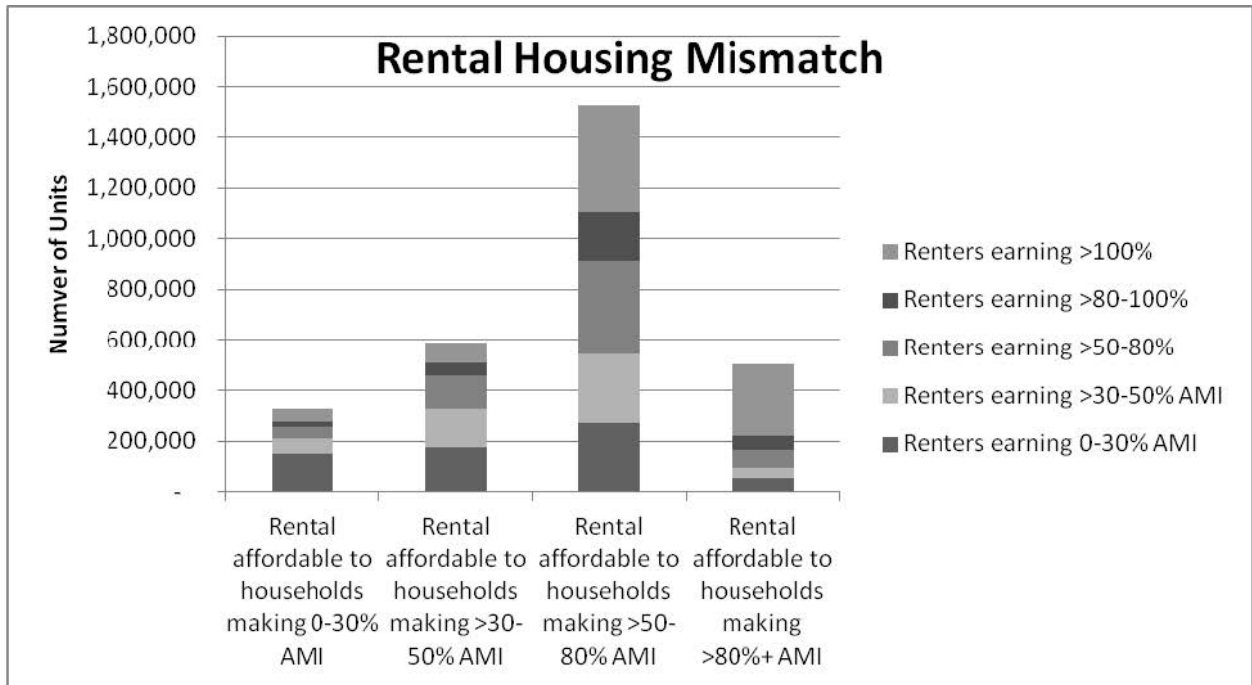


Chart 5c – Renter Housing Mismatch

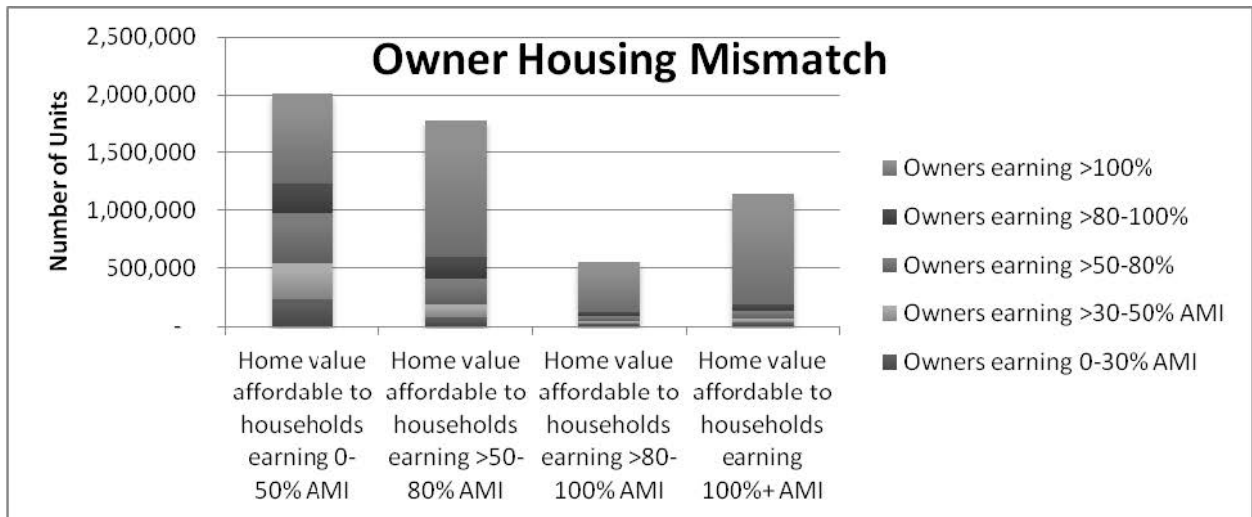


Chart 5d – Owner Housing Mismatch

Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable
High HOME Rent	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable
Low HOME Rent	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable

Table 6 – Monthly Rent – Not Applicable

Data Source Comments:

Is there sufficient housing for households at all income levels?

When comparing Needs Assessment to the Market Analysis, it becomes apparent that there is a shortage of affordable housing. According to Needs Assessment Section 10, there were approximately 671,910 renter households at 0-30% Area Median Income ("AMI") in Texas from 2006-2010. During this same time period, there were about 173,180 rental units affordable to households in this income level. This results in a shortage of 498,730 units. Continuing with this comparison, there were 534,530 renter households with incomes in the >30-50% AMI category, and 712,975 rental units available to this income category (a surplus of 178,445 units); there were 631,180 renter households with incomes in the >50-80% category and 1,919,695 rental units in this income category (a surplus of 1,288,515 units). While there appears to be a sufficient supply of rental housing for the number of households in the >30-50% and >50% to 80% AMI categories, there were 498,730 of those renter households (74%) in the 0-30% AMI category that were living in a home that results in cost burden.

Because there is no data for the 0-30% AMI category for owner housing stock, the impact of the analysis is not as compelling; there was a sufficient supply of units that were affordable to households earning >30-50% and >50-80% AMI. However, there was no data showing how many units were affordable to households making 0-30% AMI. Note that these figures do not take geography into consideration; affordable units may not exist where households want to live.

As can be seen in the Map 4a and 4b, the median rents are highest in the Metroplex, Capital, Gulf Coast and Alamo regions. These are the regions with many of the largest metropolitan statistical areas in the state. The lowest median rents are in the Northwest Texas, Southeast Texas, South Texas Border, and West Texas regions. The highest median home values are in many of the same regions with the highest rent and the areas with the lowest median home values are many of the same regions as the lowest median rents.

Tables 5a and 5b about housing mismatch compare demand and supply of affordable housing by looking at the number of households and housing units in different affordability categories. Higher income households often reside in units that could be affordable to the lowest-income households. For example, households that have incomes greater than 80% AMI can afford units in any of the defined

affordability categories for renters. Non-low-income households often reside in units that could be affordable to low-income households. Because of this, estimates of housing shortfalls should be treated cautiously as estimates of housing surplus may be overstated.

Bar charts 5c and 5d showing the housing mismatch illustrate the housing market interaction of various income groups and housing costs. These charts show the income classifications of the occupants of housing units. These figures also illustrate the housing market mismatch between housing units and income groups. For example, very low-income rental households (0-30% AMI) account for less than half of all the occupants of housing that is affordable to them. All low-income households (0-80% of AMI) make up only 56% of all households occupying housing affordable to them. Note that these units reflect market-rate affordability, and not government-monitored affordable units. These figures illustrate housing market mismatches as well as an implicit excessive cost burden for those households that are residing in units beyond their affordability category. Housing mismatch shows that the supply of affordable housing does not meet the demand for housing low-income households. The analysis indicates that additional affordable housing options may be needed for households with lower incomes.

How is affordability of housing likely to change considering changes to home values and/or rents?

One way to measure affordability is to compare median income to median housing costs. According to the U.S. Census 2000 Table QT-H11, median income for owners was \$49,279 and for renters was \$27,506. For the 2006-2010 American Community Survey Table B25119, the median household income was \$63,684 for owners and \$31,041 for renters. For owners, this is a 30% increase. For renters, this is a 13% increase. Both of these increases compensate for approximately one half of the housing cost increases during a similar period, as illustrated in Market Analysis Section 15, Chart 32.

Another way to measure affordability is to use the Housing Affordability Index from Real Estate the Center at Texas A&M. This measurement is the ratio of median family income to the income required to qualify for an 80%, fixed-rate mortgage to purchase the median-priced home; the higher the affordability index, the more affordable the Multiple Listing Service ("MLS") Area. From 2008 to 2013, 95.7% of the MLS Areas in Texas had a higher index in 2013 than in 2008, showing an increase in affordability. However, all 46 MSAs had a lower index in 2013 than in 2011, resulting in a decrease in affordability.

Nationally, a significant and severe recession lasted from 2007 to 2009, resulting in decreasing property values (Bansak & Starr, 2011, pg 146). The Center shows that Texas as a whole was not subject to the recession's effect on housing prices, though the rate of increase was much slower during the recession than after. Also, Texas did not see a decrease in income during the recession (Seefeldt & Graham, 2013, pg 88), and instead had an increase in median income.

One example of affordability change is in Austin. Austin's index was 1.56 in 2008, which increased to 2.38 in 2011 and decreased to 1.80 in 2013. During this same period, the Center shows Austin's median income of \$69,100 in 2008, \$74,900 in 2010 (an 8.3% increase), and \$73,200 in 2013 (a 2% decrease from 2011). The median cost of housing was \$188,200 in 2008, \$190,900 in 2011 (1% increase), and \$222,400 in 2013 (17% increase from 2011). This MSA illustrates the interplay of housing costs and income.

For renters, the American Community Survey 1-year estimates (Table DP04) show that the percentage of renters with cost burden in Texas was steady at 44% in 2008 and 2012. Given the increase in median incomes reported by the Center, the steady hold in cost burden shows that there is a continuing lack of affordable housing for renters, or that the median incomes do not reflect smaller income increases at the bottom end of the income spectrum.

Housing costs are often greatly impacted by local economies. While the regional economies are considered below, one economic boom crosses regions: the Eagle Ford Shale. The Shale production area crosses 14 counties, with exploration drilling in six nearby counties. Nine of the counties are in the Coastal Bend, six are in the South Texas Border and five are in the Alamo regions. The 2012 economic impact was approximately \$61 billion, supporting 116,000 jobs. Several counties show housing shortages, such as this report from Atascosa: “Evolving from sleeping in cars, to tents, to man camps, many workers now seek more accommodating and affordable living arrangements. Therefore in 2012, [there has been] construction of new hotels, motels, RV parks, and housing subdivisions” (University of Texas at San Antonio, 2013, p. 5, 36). Economic booms such as the Eagle Ford Shale will affect housing costs.

Also as a result of an oil boom, one consultation on the 2015-2019 State of Texas Consolidated Plan noted that vacancies in West Texas are extremely low. A staff member at Esperanza Health and Dental Centers reported that in San Angelo, hotels and rentals are charging disproportionately high rent which oilfield employees can afford, but strains the local public.

How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?

NOT APPLICABLE TO STATE GRANTEES

Discussion:

This section has demonstrated that the supply of affordable housing did not meet the demand. The condition of housing is discussed in Market Analysis Section 20.

Some factors that can affect the housing market are outlined in the Texas Comptroller’s In Focus reports. The Comptroller’s regions do not exactly match TDHCA’s regions but they generally follow a similar pattern. Note that the Comptroller did not analyze every region.

The Alamo Region has a large military presence. Other major industries include petroleum processing, education, and health services. The Alamo Region is majority-minority, with 88% Hispanic residents. The Alamo Region’s higher median rents and median home values are not in Bexar County, which holds the Region’s largest city: San Antonio. The counties with the highest median housing costs are north of Bexar: Kendall and Comal counties. This could be a result of close proximity to the Capital area, which has some of the State’s highest median housing costs, rather than being related to the Alamo Region.

Central Texas has a large military community and its major aquifers, coal, oil, and natural gas deposits can lead to substantial growth. Its transportation system is one of the main arteries of the State. However, its population is growing slower than the state as a whole (Texas Comptroller of Public Accounts, 2009, p. i). Central Texas had neither high nor low median housing costs.

The Gulf Coast has Texas' largest city, Houston, which has some of the world's largest energy companies, aided by port access and other transportation options. Another major employer is the Houston Texas Medical Center, which contributes \$14 billion to the economy each year. In 2010, personal income in Houston was higher than the state's average by 24% (Texas Comptroller of Public Accounts, 2010, p. i). The high incomes correlate with some of the highest median housing costs in the State.

The High Plains' largest cities, Amarillo and Lubbock, could lead the region in job growth, though that growth would be approximately on par with the State's average. The region's natural resources and affordable energy could be drivers of industry. However, residents aged over 25 years had a slightly below average number of years in school, at 12.8 years for the Region compared to 13.1 years for the State (Texas Comptroller of Public Accounts, 2008, p. 83). The High Plains Region is in line with the State's median housing costs.

The South Texas Border is a high-growth area in education, health services, and finance, as well as being strong in fishing, agriculture, and international trade. The Region is strong in tourism, with two major rivers and many state parks (Texas Comptroller of Public Accounts, 2008, p. 1). The South Texas Border Region had lower median housing costs. With strong growth, the median rents and home values may rise.

Upper East Texas is strong in agriculture, food processing, transportation and manufacturing, though finance and professional and business services are growing. The Region has many natural resources and productive rural communities. However, population growth in this region is slower than the State's average (Texas Comptroller of Public Accounts, 2008, p. i). Upper East Texas had lower median rents and home values than the State as a whole.

Upper Rio Grande had average employment growth compared to the state, with major sectors in professional and business services. The military is the region's largest employer. The population is concentrated in El Paso, is primarily young and predominantly Hispanic. The Region holds an international trade corridor between Mexico and the U.S. and has many public parks (Texas Comptroller of Public Accounts, 2008, p. i). This Region, despite its large city, had neither high nor low median rents nor home values.

MA-20 Condition of Housing – 91.310(a)

Introduction:

In 1978, lead-based paint was banned for use in housing. Lead-based paint poses the greatest danger during deterioration. Children under the age of six years old are the most at risk because they tend to put their hands or objects, which may have lead dust, into their mouths, and also may absorb more lead because of their growing bodies (Centers for Disease Control and Prevention, 2013).

While lead from paint chips can be seen, lead from dust is often not visible, and both are hazardous. Lead-based paint in housing may be a hazard if found in areas where children often touch or chew, such as windows and window sills, doors and door frames, stairs, railings, banisters, and porches. Lead dust can be created when paint is scraped, sanded or heated, and the dust can enter the air if vacuumed or swept (Environmental Protection Agency, 2013, September).

Definitions

The State currently defines “standard condition” of housing as properties that meet Texas Minimum Construction Standards for single-family development which comports with HUD’s property standards as revised in 2013. Standard condition for multifamily developments is defined as meeting Uniform Physical Condition Standards (“UPCS”).

“Substandard condition but suitable for rehabilitation” refers to properties that do not meet the above standards but are not sufficiently deteriorated to justify demolition or replacement. These definitions refer to the condition of properties prior to the receipt of assistance. The concept of “not sufficiently deteriorated” is intentionally left with some flexibility for considering situations case by case.

The TDHCA's Compliance Division inspects all HOME rental developments for compliance with UPCS. However, through the release of the new HUD HOME rule and training with HUD, TDHCA understands that UPCS can only be used if there are no local codes or if UPCS meets or exceeds the local codes. TDHCA staff is implementing procedures to ensure compliance with this requirement.

Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	1,419,441	26%	1,292,311	43%
With two selected Conditions	65,659	1%	132,826	4%
With three selected Conditions	5,387	0%	8,426	0%
With four selected Conditions	367	0%	683	0%
No selected Conditions	4,046,334	73%	1,567,772	52%
Total	5,537,188	100%	3,002,018	99%

Table 7 - Condition of Units

Data Source: 2006-2010 ACS

Year Unit Built

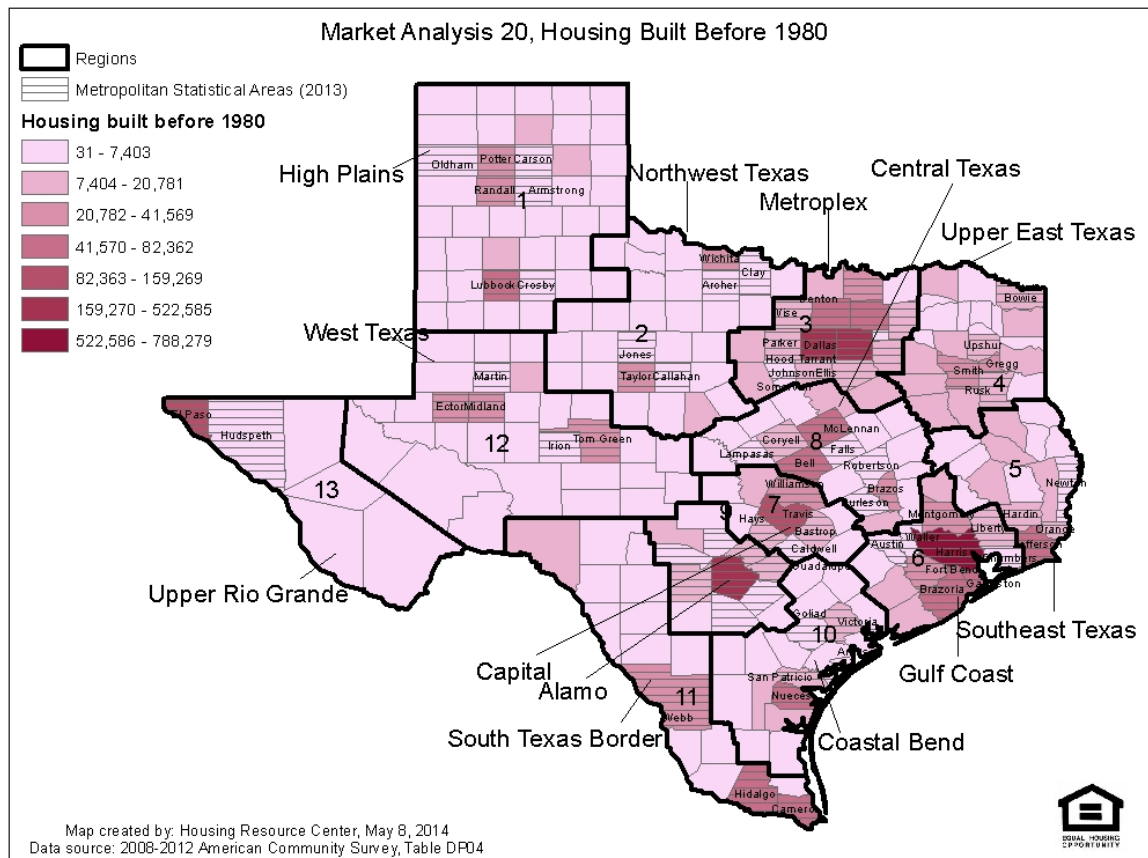
Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	1,147,592	21%	509,520	17%
1980-1999	1,917,243	35%	1,052,111	35%
1950-1979	2,000,607	36%	1,201,985	40%
Before 1950	471,746	9%	238,402	8%
Total	5,537,188	101%	3,002,018	100%

Table 8 - Year Unit Built

Data Source: 2006-2010 CHAS

	0-30% AMI	30-50% AMI	50-80% AMI	80-100% AMI	100+	Total
Owner	217,910	280,945	422,315	261,385	1,289,800	2,472,355
Renter	359,705	289,900	309,695	144,840	336,250	1,440,390

Table 8a - Renters/Owners Living in Housing Built Before 1980



Map 8b - Housing Built Before 1980

Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	2,472,353	45%	1,440,387	48%
Housing Units build before 1980 with children present	426,590	8%	3,012,470	100%

Table 9 – Risk of Lead-Based Paint

Data Source: 2006-2010 ACS (Total Units) 2006-2010 CHAS (Units with Children present)

Households with Children	0-30% AMI	30-50% AMI	50-80% AMI	80-100% AMI	100+	Total
Owner	26,805	43,680	73,220	44,025	173,125	360,855
Renter	107,335	88,700	79,130	32,935	53,925	362,025

Table 9a - Households with Children Living in Pre-1980 Housing

*Housing built before 1980

Please note that, while it would be helpful to show the number of housing units built before 1978 since that would be the first year that new housing would be built without lead-based paint, the closest year that the census has regarding new housing built during that time period is 1980.

Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units	Not available	Not available	Not available
Abandoned Vacant Units	Not available	Not available	Not available
REO Properties	Not available	Not available	Not available
Abandoned REO Properties	Not available	Not available	Not available

Table 10 - Vacant Units

Data Source: 2005-2009 CHAS

	2010 Decennial Census	2010 American Community Survey	2011 American Community Survey	2012 American Community Survey
Homeowner Vacancy Rate	2.1%	2.2%	2.3%	1.9%
Rental Vacancy Rate	10.9%	10.8%	10.8% 9.4%	8.7%

Table 11 - Table 10a - Decline in Vacancy Rates from 2010-2012

REO

Please note, the "REO" properties in the chart above refer to Real Estate Owned, which are properties owned by a lender taken back as either foreclosures or as a deed in lieu of foreclosure.

Need for Owner and Rental Rehabilitation

The age of the housing stock provides an indication of its relative condition. Older units are more likely to require repairs, are more costly to repair and renovate, may not contain desired amenities, and are more likely to contain lead paint hazards than more recently constructed units.

Table 7 lists housing units with conditions, including (1) lack of complete plumbing facilities, (2) lack of complete kitchen facilities, (3) more than one person per room, and (4) cost burden greater than 30%. There is a much higher percentage of owner-occupied units without any housing conditions (73%) than renter-occupied units (52%). In addition, Table 8 shows the year units were built by occupancy. The percentage of owners and renters is very similar for each date range of built units.

The analysis of the condition of Texas's housing stock includes evaluating the amount of vacant and abandoned housing units and their suitability for rehabilitation. According to Table 10a above, approximately 1,195,539 housing units in Texas, (12%) are considered vacant. According to the US Census, the definition of a vacant housing unit is one in which no one is living at the time of the interview. A vacant unit may be one which is entirely occupied by persons who have a usual residence elsewhere.

Not all vacant housing units are abandoned. However, due to the size of the state and the complexity of assessing abandoned housing units, the State does not currently estimate the number of abandoned housing units in Texas.

One public comment requested the inclusion of the need for housing rehabilitation in Bandera, Gillespie, Kerr, and Kendall counties. In addition, the commenter noted that there were many residents in these counties who would qualify for homeowner rehabilitation assistance based on the quality of their homes and their incomes. All these counties are in the Alamo Region.

The Chair of the Texas Interagency Council for the Homeless ("TICH"), who is also CEO of Cornerstone Assistance Network, noted during one consultation for the 2015-2019 State of Texas Consolidated Plan that the Cornerstone staff has frequently seen unsafe housing conditions in and around Hondo, Texas. He mentioned seeing gas lines that have been run through garden hoses. The TICH representative for the Texas Department of Criminal Justice ("TDCJ") echoed the observations during the same consultation. TDCJ staff inspects housing for parolees, and had witnessed many substandard housing

conditions, noting that there were also very few housing options for ex-offenders statewide because of the lack of landlords which will rent to an ex-offender. As a result of their limited options, many ex-offenders occupied substandard homes.

Estimated Number of Housing Units Occupied by Low or Moderate Income Families with Lead Based Paint Hazards

According to Table 8 above, there are 3,912,740 housing units in Texas that were built before 1980, many of which potentially contain lead-based paint. Of these homes, 1,440,387 are occupied by renters and 2,472,353 are occupied by owners.

According to 2006-2010 Comprehensive Housing Affordability Strategy ("CHAS") Table 13, there are 921,170 homeowners with incomes at 0-80% AMI living in homes built before 1980 and 959,300 renters with incomes at 0-80% AMI living in homes built before 1980. Also more renters with 0-80% AMI live in housing built before 1980 than renters with incomes above 80% AMI. This may be because housing built before 1980 is less expensive than newer houses. However, 63% of owners that live in houses built before 1980 have incomes over 80% AMI. This appears to run contrary to the renter data until looking at the total number of homeowners: 5,537,190. This may have to do with the fact that more owners are in the 80+% AMI category (3,906,760 households) than the 0-80% AMI category (1,630,430 households). Finally, there are 45% of owners living in housing that is pre-1980, and 48% of renters living in housing that is pre-1980.

There are 722,880 households with children under six years old living in pre-1980 housing, which is almost equally split between renters (362,025 households) and owners (360,855 households). However, when looking at the AMI categories, renters in the 0-80% AMI have much higher numbers of households with children living in pre-1980 housing, at nearly two renters to every owner: 275,165 renters with children in the 0-80% AMI category living in pre-1980 housing compared to 143,705 owners with children in the 0-80% AMI category living in pre-1980 housing.

Discussion:

Vacancy and the condition of housing often depend on local economies. One consultation from Region 4 on the 2015-2019 State of Texas Consolidated Plan communicated that, because of the shifting economy in some areas and loss of large employers, there can be a high vacancy rate in some communities. However, the minimum wage for workers and people with limited income is often not enough to rent the units.

As noted above, the age of the housing stock provides an indication of its relative condition. Older units are more likely to require repairs, are more costly to repair and renovate, may not contain desired amenities, and are more likely to contain lead paint hazards than more recently constructed units. According to a University of Texas at Austin study on community and regional planning, "redevelopment often threatens older apartments, built in the 1970s and early 1980s during a building boom fostered by federal tax incentives. While often these aging apartments are a poor fit for the family households who inhabit them, they have become the largest stock of rental housing affordable to very low income residents" (Muller). Further, rental vacancy rates have dropped from 10.9% in 2010 to 8.7% 2013. As indicated in Table 10a, Decline in Vacancy rates, Texas has seen a steady decline in the rental vacancy rate since 2010.

MA-25 Public and Assisted Housing – (Optional)

Introduction:

TDHCA serves as a Public Housing Authority ("PHA") with authority to issue up to 1,540 Section 8 HCVs, but available funds to administer only approximately 840.

Totals Number of Units

Program Type									
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available				1,540			0	0	0
# of accessible units									

*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Table 12 – Total Number of Units by Program Type

Data Source: PIC (PIH Information Center)

*Special Purpose Voucher - Disabled: There are 15 out of 35 vouchers currently being used by Project Access, which assist persons under the HUD Special Purpose Voucher category "Non-Elderly Disabled" as of October 2014.

Describe the supply of public housing developments:

Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:

TDHCA's PHA Plan does not include physical units.

Describe the Restoration and Revitalization Needs of public housing units in the jurisdiction:

TDHCA's PHA Plan does not include physical units.

Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing:

These are included in Strategic Plan Section 50.

Discussion:

Please refer to Strategic Plan Section 50.

MA-30 Homeless Facilities – 91.310(b)

Introduction

According to HUD's 2013 Housing Inventory Count Report for Texas Continua of Care (“CoCs”), there are 22,582 year-round beds (Emergency Shelter, Transitional Housing, and Safe Haven) in Texas. Of those, 13,088 are Emergency Shelter beds, 9,336 are Transitional Housing beds, and 158 Safe Haven beds. Texas also has 11,392 Permanent Supportive Housing beds.

While this Market Analysis section focuses on Homeless Facilities, it should be noted that in terms of market dynamics, it has been shown that rapid re-housing or homelessness prevention can result in lower costs to the homeless services providers. For example, in a study of rapid re-housing in California, Minnesota, and Pennsylvania, “the average cost per exit to permanent housing was significantly lower for rapid re-housing (about \$4,100) than it was for either shelter (about \$10,000) or transitional housing (about \$22,200)” (National Alliance to End Homelessness, 2014). In addition, by offering homelessness prevention, some providers find that the individuals or families at risk of homelessness could avoid using the shelter altogether (United States Interagency Council on Homelessness, 2013a).

Facilities Targeted to Homeless Persons

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	4,941	1,023	5,617	5,637	0
Households with Only Adults	7,947	1,023	3,675	5,755	0
Chronically Homeless Households	0	0	0	0	0
Veterans	0	0	0	0	0
Unaccompanied Youth	200	1,023	44	0	0

Table 13 - Facilities Targeted to Homeless Persons

Data Source Comments: Counts based on HUD's 2013 CoC Homeless Assistance Programs Housing Inventory Count Report

Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons

Texas Health and Human Services Commission ("HHSC"): Family Violence Program. Family violence centers are located throughout the State and provide services to victims of family violence. Services for victims include 24-hour hotline guidance, information and referral services, legal services, counseling, transportation services, and assistance in obtaining medical care and job training. Selected family violence centers provide temporary shelter services.

Texas Department of State Health Services: Projects for Assistance in Transition from Homelessness ("PATH"). PATH funds are used for administration of homelessness prevention services and mental health crisis services. Funds are available to subdivisions of the State of Texas, units of local government and nonprofit entities.

U.S. Department of Veterans Affairs ("VA"): Comprehensive Homeless Centers. Comprehensive Homeless Centers offer a full range of VA homeless services and coordinate with non-VA service providers to assist homeless veterans.

TDHCA: Homeless Housing and Services Program ("HHSP"). Funded with state appropriated funds, HHSP's purpose is assisting regional urban areas in providing services to homeless individuals and families, including services such as case management, and housing placement and retention. TDHCA distributes these funds to cities with populations larger than 285,500 persons per the latest U.S. Census figures, which are currently the eight largest cities in Texas or organizations named in their stead by those eight cities.

List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.

There was more than one consultation for the 2015-2019 State of Texas Consolidated Plan regarding the lack of emergency shelter for women. While there are shelters that serve men, ESG also funds shelters that serve women. In addition, shelters for men can give references and referrals to women seeking assistance.

TDHCA administers two programs for persons who are homeless or are at risk of becoming homeless: HHSP and ESG programs.

Each city operates HHSP differently. Some provide funding to nonprofit homeless services providers who administer direct services, while others use the funds to repair or rehabilitate existing shelters or to produce more beds within their service area. The funded organizations may change yearly, and an updated list can be found online at <http://www.tdhca.state.tx.us/community-affairs/hhsp/index.htm>. Some examples of services and facilities are described below:

Mother Teresa Shelter - As described on their website, the Mother Teresa Shelter facility provides breakfast, morning and afternoon snacks, and gives access to showers, laundry facilities, use of the telephone, storage areas for personal belongings, mail receipt, and access to employment opportunities.

United Way of Tarrant County – According to its website, United Way of Tarrant County works through the City of Fort Worth’s Directions Home program to place homeless individuals in permanent supportive housing with case management services, rather than sheltering them in temporary or transitional facilities.

TDHCA's ESG funds homeless services providers throughout the state that provide direct services to persons and families who are homeless or at risk of becoming homeless. This assistance can take the form of emergency shelter, day shelters that provide services to chronically homeless individuals and at risk persons, rapid re-housing, and homelessness prevention. The funded organizations may change yearly, and an updated list can be found online at <http://www.tdhca.state.tx.us/community-affairs/esgp/index.htm>. Some examples of services and facilities are described below:

Friendship of Women, Inc. Brownsville – As described on their website, The Friendship of Women's mission is to promote safe and healthy families by allowing women, children, and men to live secure and violence-free. The Friendship of Women provides counseling to victims of domestic violence, temporary housing, food, education, relocation services, and shelter services to victims of abuse and their children.

Salvation Army-Corpus Christi – As described on their website, the Salvation Army of Corpus Christi has a number of transitional and emergency housing options. They currently are the only shelter program on the Texas Gulf Coast that can house intact families in the same semi-private apartment. Locations include emergency shelters that make provision for men, women, and families where possible.

MA-35 Special Needs Facilities and Services – 91.310(c)

Introduction

Through a broad range of statewide programs and coordination efforts between several State agencies, Texas provides facilities and services that assist persons who are not homeless but who require supportive housing and programs. These populations are described in Needs Assessment.

The State is aware that the Supreme Court's decision in the *Olmstead* case maintained that unnecessary segregation and institutionalization of people with disabilities is unlawful discrimination under the Americans with Disabilities Act ("ADA"). Furthermore, the Fair Housing Act, Section 504 of the Rehabilitation Act, ADA, and §2306.514 of the Texas Government Code all provide mandates for accessible residential housing for persons with disabilities. Housing developers may also choose to provide “adaptive design” or “universal access” housing, which promotes uniform standards in the design, construction, and alteration of structures that include accessibility or simple modification for individuals with a disability.

Because of the dedicated source of funding through Housing Opportunities for Persons with HIV/AIDS ("HOPWA"), one special need especially relevant to the State's Consolidated Plan is Persons Living with HIV/AIDS ("PLWH") and their families. The Texas Department of State Health Services ("DSHS") administers the State's HOPWA formula program, which provides Short Term Rent or Mortgage, and Utility ("STRMU"), Tenant-Based Rental Assistance ("TBRA"), Permanent Housing Placement ("PHP"), and supportive services to assist low-income HIV-positive clients and their families to establish or maintain affordable, stable housing, reduce the risk of homelessness, and improve access to health care and other services. The Texas HOPWA program is integrated with the Ryan White and State Services program, which offers additional services such as medical care, prescriptions, mental health counseling, nutritional services, transportation, health insurance assistance, and many more services. PLWH who have been out of care, recently released from an institution, or newly diagnosed are linked into care and screened for housing needs during intake.

TDHCA assists persons who are not homeless but who require supportive housing through a wide variety of programs. For the State's Consolidated Plan, most detail is given for the HOME Investment Partnerships Program ("HOME") and Emergency Solutions Grant ("ESG") program because this document guides the activities for those funding sources. TDHCA also has programs to ensure that those persons returning from mental and physical health institutions receive appropriate supportive housing. For example, the HOME TBRA and Section 811 Project Rental Assistance ("PRA") Demonstration programs assist persons returning from institutions. In addition, the Housing and Health Services Coordination Council ("HHSCC") works to increase state efforts to offer Service-Enriched Housing through increased coordination of housing and health services. HHSCC seeks to improve interagency understanding and increase the number of staff in state housing and health services agencies that are conversant in both housing and services.

Regarding services, the mission of the Health and Human Service Commission ("HHSC") is to maintain and improve the health and human services system in Texas and to administer its programs in accordance with the highest standards of customer service and accountability for the effective use of funds. HHSC accomplishes this mission by overseeing the Texas Health and Human Services System, which is composed of five agencies.

Finally, the Texas Veterans Commission administers the Housing4TexasHeroes program, or H4TH, which focuses on veterans as its special needs population.

HOPWA Assistance Baseline Table

Type of HOWPA Assistance	Number of Units Designated or Available for People with HIV/AIDS and their families
TBRA	527
PH in facilities	0
STRMU	578
ST or TH facilities	0
PH placement	15

Table 14 – HOPWA Assistance Baseline

Data Source: HOPWA CAPER and HOPWA Beneficiary Verification Worksheet

To the extent information is available, describe the facilities and services that assist persons who are not homeless but who require supportive housing, and programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing

The State provides several options for persons who are returning from or exiting institutions into the community. These include HOPWA, HOME, Project Access, Section 811 PRA, and mental health supportive housing programs.

Individuals eligible for HOPWA who are exiting from an institution into the State's HOPWA Program receive supportive services from a case manager, which include a comprehensive housing plan and linkage and referrals to health professionals to assist in keeping the client stable and housed. The State HOPWA Program provides TBRA and STRMU assistance. However, HOPWA does not specifically provide shelter vouchers.

TDHCA's HOME Single Family Division sets aside funding for persons with disabilities. Awards made under this Set-Aside can be used to provide rental assistance for persons with mental, physical, intellectual or developmental disabilities, including those existing institutions as discussed below.

TDHCA, in concert with the Department of Aging and Disability Services ("DADS"), is administering the Project Access Program, which uses Section 8 Housing Choice Vouchers to assist low-income persons with disabilities transition from institutions into the community by providing access to affordable housing. Due to budget constraints, the Project Access waitlist has greatly increased, which has caused great concern that people are waiting longer periods of time to leave an institution. TDHCA is committed to work with local HOME TBRA administrators to transition households with TBRA funds while the households wait for their Project Access Voucher to become available. All households participating in the program have been assigned case managers who assist in the provision of supportive services and the provision of a continuum of care.

During the Consolidated Planning period, Texas anticipates implementing the HUD Section 811 PRA Program. This program provides project-based supportive housing for persons with disabilities serving three target populations: individuals transitioning out of institutions, people with serious mental illness and youth with disabilities transitioning out of foster care. Individuals in the target population will be eligible for services funded by the Texas Medicaid Program and will be housed in project-based units located in TDHCA-funded multifamily properties. The program is a partnership between TDHCA and the Health and Human Services agencies in Texas to ensure that Section 811 PRA tenants in Section 811 PRA units have access to appropriate supportive services to maintain stable housing. TDHCA anticipates that property owners applying to the HTC Program will be motivated to apply.

Finally, in 2013 the Texas Legislative Session (83R) provided DSHS with \$10.8 million for short and long-term rental and utility assistance to individuals with mental illness (Housing and Health Services Coordination Council, 2014, p 32).

Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing

As described above, HOPWA, Project Access, and the Section 811 PRA programs all provide supportive housing options for persons exiting mental and physical health institutions.

The State HOPWA Program does not provide supportive housing (e.g. shelter vouchers), but does provide TBRA and STRMU assistance. Some project sponsors provide financial assistance with security deposits and credit checks. Services provided by this program are described in response to the question that describes the facilities and services that assist persons who are not homeless but who require supportive housing, and programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing.

The Project Access Program ensures that persons leaving nursing homes and Intermediate Care Facilities ("ICFs") for Individuals with Intellectual Disabilities ("IIDs") receive supportive housing because, in addition to the housing voucher, they are able to exit the institution and bypass the Medicaid waiver interest lists and are enrolled into one of DADS or HHSC waiver programs. They are supported by DADS contract Relocation Contractors who assist individuals leaving nursing homes pre- and post-transition to the community.

In addition, the Project Access Program includes a pilot with DSHS to serve individuals leaving State psychiatric facilities. These individuals also receive a housing voucher and supportive services through DSHS.

Texas anticipates that the Section 811 PRA Program will provide an affordable housing option for extremely low-income households transitioning out of nursing facilities and ICFs for IIDs. In addition, persons with serious mental illness, some of which may have been in mental institutions in their past or transitioning out of those facilities, will be eligible for Section 811 PRA. The program is a partnership between TDHCA and the Health and Human Service agencies in Texas, who will ensure that appropriate services are available for Section 811 PRA tenants to maintain stable housing.

Finally, DSHS developed a needs and capacity assessment and released a Request for Proposal ("RFP"). Responses to the RFP resulted in 18 of the 39 Local Mental Health Authorities being approved to provide

rental assistance to people with mental illness who are homeless or at-risk of homelessness (Housing and Health Services Coordination Council, 2014, p 32).

Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)

The State has several agencies that address housing with supportive services for people with special needs. The special needs populations below are included in the one-year goals in Strategic Plan Section 35 for HOME, ESG, and HOPWA.

TDHCA's governing statute, Texas Government Code §2306.111(c)(2), states that 5% of the HOME allocation shall be directed toward assistance for Persons with Disabilities who live in any area of the State. In addition, TDHCA may consider allowing HOME Administrators to propose to limit beneficiaries or give preferences to low-income special need populations, as described in the Needs Assessment Section 45.

TDHCA's HOME Multifamily Development funds may be paired with the 9% HTC Program that have the potential to serve populations insofar as the Qualified Allocation Plan ("QAP") provides scoring incentives for competing 9% applicants to serve populations with special needs. The QAP also includes certain scoring options only available to supportive housing developments.

TDHCA's ESG subrecipients may choose to prioritize certain special needs populations to serve with their ESG State funds. For example, in the 2013 ESG competition, TDHCA awarded more points to applicants who would serve subpopulations that typically have high barriers to housing, including: persons with serious mental illness; persons recently released from institutions; and persons with substance use disorders.

A full list of TDHCA programs that assist persons with special needs can be found in the State Low Income Housing Plan and Annual Report. This publication is updated annually and can be found online at <http://www.tdhca.state.tx.us/housing-center/pubs-plans.htm>.

How HOPWA serves PLWH was described in the previous questions in this section.

The Texas Veterans Commission H4TH program awards grants to nonprofit or local government organizations to address home modification needs of Low-Income, Very Low-Income and Disabled Texas Veterans and their families. Such needs include, but are not limited to, the following: walkways, ramps; doors, windows, and flooring materials; sliding doors; handrails and grab bars; bathroom modifications; and weatherization.

Regarding services to support persons with special needs, HHSC oversees the operations of the Health and Human Services System composed of five agencies: HHSC, DADS, DSHS, Department of Assistive and Rehabilitative Services ("DARS"), and Department of Family and Protective Services ("DFPS"). HHSC also administers health care services (such as Medicaid) food assistance and emergency assistance services.

DADS administers long-term services and supports for people who are aging and for people with intellectual and physical disabilities.

DARS administers programs that help Texans with disabilities with vocational rehabilitation and independent living, and children under age 3 with disabilities and developmental delays to reach their full potential.

DSHS promotes optimal public and behavioral health through effective public health, clinical, mental health, and substance abuse services.

DFPS protects the elderly, people with disabilities and children from abuse, neglect, and exploitation through investigations and services; and regulates and manages community-based programs for these populations.

For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))

NOT APPLICABLE TO STATES

MA-40 Barriers to Affordable Housing – 91.310(d)

Describe any negative effects of public policies on affordable housing and residential investment.

Regulatory barriers cited by the 2013 Analysis of Impediments to Fair Housing Choice ("AI") included zoning and land use ordinances and a lack of universal design concepts in planning goals. It also identified local best practices that mitigate barriers and promote choice. Best practices highlighted land use and zoning regulations, such as definitions of "family" that include unrelated persons living together in residential settings; providing for at least one zone for small lot single family dwellings; and making reasonable residential lot size requirements (e.g., districts/overlays that allow multifamily homes by right and enough land for multifamily units). Other items included allowing manufactured homes in at least one residential district; avoiding minimum dwelling sizes; avoiding permitting or public disclosure for group homes; incentivizing diverse housing stock through density, reduced parking requirements, fee waivers/reductions, and allowance for accessory dwelling units; and public land donations or set-asides for low-income and special needs populations.

During the consultation process of the 2015-2019 State of Texas Consolidated Plan, many of the impediments identified within the AI were echoed by the Inclusive Communities Project. The Inclusive Communities Project commented that state statute prohibits the use of inclusionary zoning, which allows a municipality to require a share of new construction to be affordable to persons with low to moderate incomes. TDHCA is unaware of any statute which expressly prohibits inclusionary zoning.

The AI recommended that local governments review and adopt best practices for furthering fair housing choice, and that the State assist in promoting best practices through communication with Councils of Government ("COGs") and trade organizations. The AI mentioned Not in My Backyard ("NIMBYism") and a lack of affordable housing knowledge as issues.

The AI focused on action items the State could adopt to improve housing opportunities and mobility for low-income households and protected classes. There are 22 Action Steps that relate to six impediments and four observations.

TDHCA began work on the action steps by creating a Fair Housing Team, with a Fair Housing Team Lead. Two additional staff may be hired in the future. The Fair Housing Team is reviewing each program to determine what is currently done to further action steps, gather information on challenges, and compile demographic data. Fair Housing staff will review guiding documents and agency-wide policy and plans, assist with data analysis, pinpoint gaps in service provision, and make recommendations about populations least likely to be served by housing programs. Data gathering will result in a quarterly reporting tool identifying agency-wide and program area actions, and a mapping and demographic database to provide service area data for a public website interface. The Fair Housing Team meets at least quarterly with other state agencies to share best practices and coordinate Fair Housing activities.

Finally, a policy that affects the return on investment of affordable housing funds involves the pressure from local governments, nonprofits and other subrecipients to use grants instead of loans. For example, between 2008 and 2010, the HOME Program adjusted its policies to use loans instead of grants in an effort to recycle loan repayment into HOME for additional subrecipients. However, many subrecipients stopped administering HOME in protest, resulting in some activities returning to grants and the loss of

the repayment of funds. However, because of the cuts to HOME funding from HUD, the affordable housing community may now be more receptive to the transition back to loans because of potential program income.

The efforts of the State to mitigate these barriers will be seen in Strategic Plan Section 55 and Action Plan Section 75.

MA-45 Non-Housing Community Development Assets -91.315(f)

Introduction

Economic Development Market Analysis

Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers	Share of Jobs	Jobs less workers
			%	%	%
Agriculture, Mining, Oil & Gas Extraction	343,348	290,100	3	3	0
Arts, Entertainment, Accommodations	968,713	1,141,900	8	10	2
Construction	928,574	611,500	8	5	-3
Education and Health Care Services	2,461,200	1,483,900	22	13	-9
Finance, Insurance, and Real Estate	767,868	681,700	7	6	-1
Information	220,371	200,700	2	2	0
Manufacturing	1,086,151	871,600	9	8	-1
Other Services	608,319	396,500	5	4	-1
Professional, Scientific, Management Services	1,227,671	1,458,200	11	13	2
Public Administration	510,560	1,811,100	4	16	12
Retail Trade	1,331,684	1,218,800	12	11	-1
Transportation and Warehousing	636,941	464,700	6	4	-2
Wholesale Trade	349,556	559,700	3	5	2
Total	11,440,956	11,190,400	--	--	--

Table 15 - Business Activity

Data Source Comments:

Labor Force

Total Population in the Civilian Labor Force	19,110,058
Civilian Employed Population 16 years and over	12,497,978
Unemployment Rate	7.70
Unemployment Rate for Ages 16-24	3.20
Unemployment Rate for Ages 25-65	4.90

Table 16 - Labor Force

Data Source Comments:

Occupations by Sector	Number of People
Management, business and financial	1,609,247
Farming, fisheries and forestry occupations	62,157
Service	2,003,418
Sales and office	2,880,468
Construction, extraction, maintenance and repair	1,220,327
Production, transportation and material moving	1,355,206

Table 17 – Occupations by Sector

Data Source Comments:

Travel Time

Travel Time	Number	Percentage
< 30 Minutes	6,990,976	64%
30-59 Minutes	3,113,814	29%
60 or More Minutes	761,712	7%
Total	10,866,502	100%

Table 18 - Travel Time

Data Source Comments:

Education:

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	1,359,375	140,886	827,837
High school graduate (includes equivalency)	2,192,885	186,244	857,643
Some college or Associate's degree	2,956,112	197,195	794,215
Bachelor's degree or higher	2,936,020	105,658	509,294

Table 19 - Educational Attainment by Employment Status

Data Source Comments:

Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	0	351,423	337,522	584,602	255,633
9th to 12th grade, no diploma	503,337	347,830	334,043	578,575	252,997
High school graduate, GED, or alternative	786,140	916,976	880,341	1,524,786	666,754
Some college, no degree	0	826,095	793,351	1,374,116	600,869
Associate's degree	1,120,833	231,886	222,695	385,717	168,665
Bachelor's degree	0	634,064	608,932	1,054,695	461,193
Graduate or professional degree	186,805	315,221	302,726	524,334	229,279

Table 20 - Educational Attainment by Age

Data Source Comments:

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	18,676
High school graduate (includes equivalency)	26,816
Some college or Associate's degree	33,929
Bachelor's degree	51,363
Graduate or professional degree	64,972

Table 21 – Median Earnings in the Past 12 Months

Data Source Comments:

Based on the Business Activity table above, what are the major employment sectors within the state?

Texas' business friendly environment continually attracts new business sectors while growing established industries. Major employment sectors currently include Government, Education, Health Care Services, Professional Services, Retail Sales, and Hospitality.

Describe the workforce and infrastructure needs of business in the state.

As the Technology, Manufacturing and Energy sectors become larger components of the Texas economy, education, and training in these fields is needed to establish a job-ready workforce. Correspondingly, growth in these sectors has increased demand on existing infrastructure, necessitating plans for improvement and expansion, and provision of housing.

Describe any major changes that may have an economic impact, such as planned public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.

The private energy sector's expansion of oil and natural gas exploration throughout the state has positively impacted the state's economy through job and business growth. However, this change has

been accompanied by a growth in demand on current water and transportation infrastructure by both the private and public sector. Furthermore, the ongoing, statewide drought has further diminished current water infrastructure capacity.

How do the skills and education of the current workforce correspond to employment opportunities in the state?

Explosive population growth and increased global competition present both new opportunities and challenges to ensuring Texans' skills and education remain competitive in the modern workforce.

Describe current workforce training initiatives supported by the state. Describe how these efforts will support the state's Consolidated Plan.

The Governor's Office has put forward several initiatives to improve workforce training, including:

- Making college preparation the standard curriculum for all students
- Increased emphasis on Science, Technology, Engineering and Math ("STEM") subjects

Describe any other state efforts to support economic growth.

The State continues efforts that ensure Texas remains a business friendly climate through low taxes, a reasonable and predictable regulatory structure, and development of a diverse and educated workforce. The Texas Department of Agriculture's ("TDA") Texas Capital Fund ("TCF") provides grant funds to non-entitlement communities for infrastructure improvements in support of projects that primarily benefit low-to-moderate income persons.

Discussion

MA-50 Needs and Market Analysis Discussion

Are there areas where households with multiple housing problems are concentrated? (include a definition of "concentration")

In Market Analysis Section 20, the analysis of Table 7 showed that renters had more deficient housing conditions than owners. (As a reminder, housing conditions include (1) lack of complete plumbing facilities, (2) lack of complete kitchen facilities, (3) more than one person per room, and (4) cost burden greater than 30%.) When examining households with more than one housing condition to answer this question, an updated table was used: the 2008-2012 American Community Survey Table B25123. This statewide analysis showed that 5% of renters and 1% of owners had two or more housing conditions. When renters and owners were examined together, the statewide average for households with two or more housing conditions was 3%. A definition of a "concentration" of multiple housing problems is a county with a percentage of the population with multiple housing problems above the state average. By county, concentrations of housing problems ranged from 0-10%, though only 15 counties were above the statewide average of 3%. These counties are mostly located in the South Texas Border Region, with one county each in the Gulf Coast, Coastal Bend, High Plains, Upper Rio Grande, and West Texas regions (see map in Market Analysis Section 20). Counties with multiple, concentrated housing problems are: Cameron, Culberson, Duval, Edwards, Floyd, Frio, Harris, Hidalgo, Karnes, Maverick, Menard, Starr, Uvalde, Webb, and Zapata.

Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")

Concentration of minority areas (or racially/ethnically-impacted areas) were defined by the Phase 2 AI as any neighborhood or Census tract in which: 1) The percentage of households in a particular racial or ethnic minority group is at least 20 percentage points higher than the percentage of that minority group for the housing market areas; 2) The total percentage of minority persons is at least 20 percentage points higher than the total percentage of all minorities in the housing market areas as a whole; or 3) If a metropolitan area, the total percentage of minority persons exceeds 50% of its population. Maps of the census tracts can be found in each Regional section of the AI.

The South Texas Border and Upper Rio Grande had the highest percentages of poverty, and both areas had majority Hispanic/Latino populations. The lowest-incomes correlate with the highest levels of minority concentration. African Americans represent a majority-minority population in the North Texas Panhandle, Northern, and the east Texas coastal areas. Hispanic/Latino populations represent a majority-minority population along the South and Southwest Texas borderlands.

The two regions with the highest poverty rates are described below. The other regions are described after the question: What are the characteristics of the market in these areas/neighborhoods?

Texas Region 11: South Texas Border. Region 11's population is majority Hispanic/Latino: six counties have over 80% of their population and four counties have 50% of their population as Hispanic/Latino population. Growth outside population centers frequently leads to the creation of colonias. Four counties show greater than 50% of African Americans living in poverty (Maverick, Starr, Uvalde, and Webb). Dimmit, Kinney, Willacy, Zapata, and Zavala counties all show greater than 40% of the Hispanic/Latino populations as living in poverty (all of which represent smaller and more rural

communities). Together with Region 13, attributes of this area include fifteen counties above the state average for the concentration of multiple housing problems and the greatest percentage of poverty.

Texas Region 13: Upper Rio Grande. Region 13 is majority Hispanic/Latino and has distinct affluent and low-income communities. Of low-income households, 80% are located in El Paso City, while the neighboring Hudspeth County is the only county in which more than 50% of the Hispanic population is living in poverty. Census tract data shows that most areas with racially concentrated areas of poverty are located around El Paso. Together with Region 11, attributes of this area include fifteen counties above the state average for the concentration of multiple housing problems and the greatest percentage of poverty.

The 2013 AI discussed possible causes of concentrations of minorities as an effect of market forces, historic patterns of development, and zoning and land use policies. In some places, affordable housing for low-income residents is concentrated outside of municipal boundaries in the counties or in colonias. Areas along the Texas-Mexico border represent larger populations of unbanked residents who cannot qualify for loans needed to develop new or rehabilitate existing substandard housing; these residents also face poorer infrastructure, limited community amenities, and a lack of affordable homes in neighboring areas.

What are the characteristics of the market in these areas/neighborhoods?

The 2013 AI described many areas along the border as engaging in a continual struggle for fresh water, food, sewer services, and public infrastructure. Tremendous growth is occurring along the South Texas Border, for example, this area showed a population increase of 27%, the vast majority of which was an increase in Hispanic population. Surveys done as part of the AI suggest that the south Texas market, specifically in colonias, is more affordable because these areas are overall less desirable for development, often due to environmental quality and the undesirable types of infrastructure characteristic of neighborhood disinvestment. These areas represent targets for future study to determine how rule and policy changes can create effective change in future funding cycles. Another factor in the market is that because of historic contract for deed home purchase arrangements not all residents have full title and therefore this market may be affected by households not having the opportunity to make use of the full benefits of homeownership.

The characteristics of the regions are as follows:

Texas Region 1: High Plains. Lower-income minority populations live throughout the region in small agricultural towns and in clusters in the cities of Amarillo and Lubbock.

Texas Region 2: Northwest Texas. The region is predominantly White (non-Hispanic) with clusters of minority populations in the cities, especially Abilene and Wichita Falls.

Texas Region 3: Metroplex. Historically, Region 3 has been divided along racial and ethnic lines by major highways and geographic barriers. This institutional separation has influenced settlement patterns: African American and Hispanic populations mainly live in the southern part of the Dallas-Fort Worth Metroplex. In general, poverty rates are higher in the city centers than in the region overall.

Texas Region 4: Upper East Texas. Region 4 includes a handful of racially-concentrated areas of poverty, which are located mainly in north Tyler and Longview.

Texas Region 5: Southeast Texas. Region 5 is the third poorest region in Texas, behind Regions 11 and 13.

Texas Region 6: Gulf Coast. The racial and ethnic concentration analysis that was done in the Phase 2 AI found racial and ethnic segregation present in the state's larger metro areas, including the Gulf Coast region. Ninety-six percent of the region's residents in poverty live in urban areas. Most low-income residents live in heavy industrial areas, attracted by affordable property prices.

Texas Region 7: Capital. Region 7 has witnessed the largest growth of any region in the State of Texas. Overall, Region 7 shows one of the lowest rates of households living below the poverty line. Consultation from the South Central Texas 2-1-1 found that the area is experiencing an increasing suburbanization of poverty, and many of the schools have an increasing percentage of children in poverty.

Texas Region 8: Central Texas. None of the counties in Region 8 show greater than 50% of African American or Hispanic populations living in poverty.

Texas Region 9: Alamo. Region 9 has experienced strong suburban growth in the affluent suburbs north of San Antonio; the north side of the city and its suburbs are majority White, while areas south of the city are majority Hispanic.

Texas Region 10: Coastal Bend. Brooks County has the highest level of low area median income in the state. Low-income families are generally clustered in areas within major cities.

Texas Region 12: West Texas. Region 12 is predominantly White but has a relatively large proportion of Hispanic/Latino population. Low-income minority populations are often homogeneously clustered in neighborhoods within Midland, Odessa, and San Angelo.

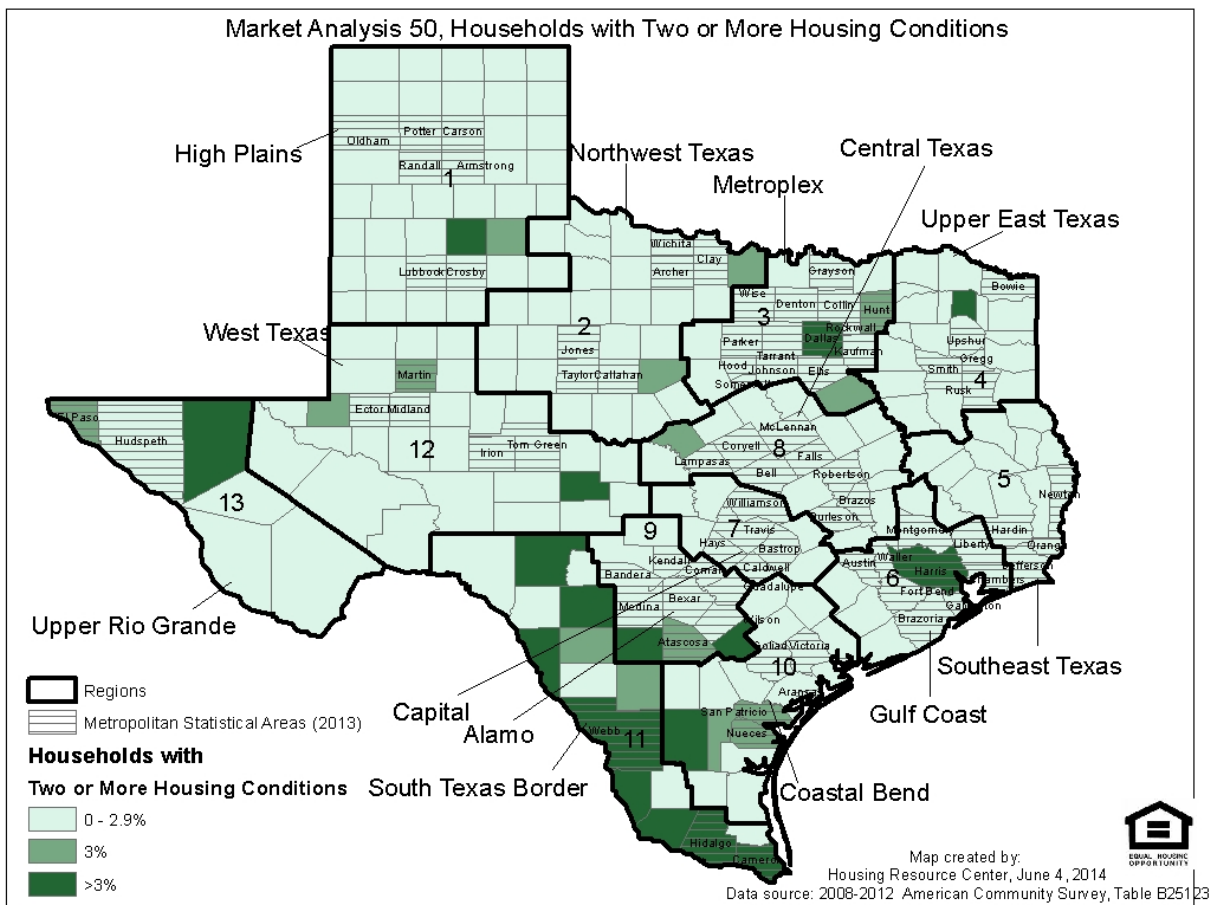
Are there any community assets in these areas/neighborhoods?

As the AI notes, community assets in areas of high minority concentrations and low-income families are few. To give general background on these areas, many of the border towns and Gulf Coast areas do not have building codes, which may have depressed the value of community assets and housing stock; permitting is done through county governments which generally have fewer or no building codes, rather than the local communities. As further indicated in the AI, current ordinances and policies may have a discriminatory effect and an impact on the ability to procure housing assistance, in many cases leaving buyers without viable new construction options and contributing to overcrowding and substandard housing in the market area. Building codes also require that housing be connected to infrastructure (e.g., power, water, sewer) and other necessary services.

Rental housing was noted on a survey as an area of concern given older stock that is continuing to deteriorate and a lack of new available options. Coordinated efforts to link affordable housing to schools, employment opportunities, and transit are emerging in affordable housing provision and to take advantage of opportunities for revitalization of strong existing linkages – stakeholders from urban

and suburban communities are beginning to discuss creating linkages. Rural communities with low capacity in development and organizational infrastructure are beginning to mobilize regional efforts (such as the USDA's Stronger Economies Together focus groups and subcommittees) to study and improve housing, health, education, and technology in rural areas and small cities, thereby working to improve community assets. Some regional consortiums are being formed (such as the Hidalgo County Metropolitan Planning Organization) in the hope that consortiums will better influence policy for cities and create mixed use, mixed income, and transportation-oriented affordable housing. While these developments are new, the AI also communicated the need for the state to provide additional trainings to local jurisdictions and discuss and market available programs and Fair Housing trainings. The Texas Workforce Commission, TDHCA, and TDA are currently mobilizing to provide such trainings and materials. Additionally, the use of Community Housing Development Organizations ("CHDO") provides an opportunity for funds that are often not utilized to be accessed to enhance local assets.

Are there other strategic opportunities in any of these areas?



Map 21 – Concentration of Housing Problems

An opportunity exists to increase service delivery and hopefully enhance the resources and assets of communities in these areas by gathering more comprehensive data through contract administrators, awardees, and subrecipients of state funds; collate such data; and structure Notices of Funding

Availability, Contracts, and Compliance Rules to more effectively encourage collaborations and provide awareness of regional concerns as they relate to housing and infrastructure in these areas. The State is currently working on analyzing and improving data capture, reviewing barriers that may exist in these and other ethnic and minority concentrated areas, and using collected demographic data to inform program and service provision.

According to a consultation with the South Central Texas 2-1-1 network, community assets in areas of high poverty and low economic opportunity include a concentration of social services, such as transportation. Affordable housing projects in areas with more economic opportunity may not place residents in proximity to transportation systems, working contrary to the purpose of easing the strain on the household's budget.

Based on the needs analysis above, describe the State's needs in Colonias

The needs of racial minorities and concentrated poverty in Texas colonias have been discussed in the Needs Analysis Section 30 (Disproportionately Greater Need: Discussion). Colonias are mainly found in the Upper Rio Grande and South Texas Border regions, which are also discussed above.

Strategic Plan

SP-05 Overview

Strategic Plan Overview

The following Strategic Plan is the five year plan from 2015-2019 for the Community Planning and Development ("CPD") Programs governed by this document: the HOME Investment Partnerships ("HOME") Program, the Emergency Solutions Grant ("ESG") Program, the Housing Opportunities for Persons with AIDS ("HOPWA") Program, and the Community Development Block Grant ("CDBG") Program.

Strategic Plan Section 10 discusses the four programs' geographic priorities. All CPD Programs distribute funds based on formulas which take into account various need and availability factors.

Strategic Plan Section 25 discusses Priority Needs, which includes the Special Needs Populations described in Needs Assessment Section 45. Each program addresses these populations in different ways.

Strategic Plan Section 30 discusses the types of activities each program will use in response to market conditions. HOME may use the creation of new units, the rehabilitation of existing units, acquisition of units including preservation of affordability for those units, or Tenant-Based Rental Assistance ("TBRA") to assist Special Needs populations. HOPWA may use TBRA; Short-Term Rent, Mortgage, and Utilities Program ("STRMU"); Supportive Services; and Permanent Housing Placement ("PHP"). ESG may use rehabilitation in response to market conditions. CDBG may use economic development, public works, public infrastructure development, and housing activities.

Strategic Plan Section 35 discusses other programs with which CPD Programs can leverage funds, as well as committees, workgroups, and councils headed by the Texas Department of Housing and Community Affairs (TDHCA), the Texas Department of State Health Services ("DSHS"), or the Texas Department of Agriculture ("TDA"). HOME includes leveraging with the Housing Tax Credit ("HTC") Program and a variety of programs other than CPD Programs.

Strategic Plan Section 40 discusses the State infrastructure as well as the subrecipients or subgrantees of CPD Programs. HOME includes how it works with Community Housing Development Organizations ("CHDOs") and its new Reservation System. ESG includes its Continuum of Care pilot program. HOPWA includes Administrative Agencies ("AA") and Project Sponsors. CDBG includes Regional Reviews and Self Help Centers ("SHCs").

Strategic Plan Section 45 discusses the number of households to be assisted with CPD funding.

Strategic Plan Section 50 discusses the challenges facing Public Housing Authorities ("PHA") and the State's efforts to assist. Although the State does not administer funds for public housing developments, the CPD Programs, along with the HTC Program, provide opportunities to assist PHAs.

Strategic Plan Section 55 discusses barriers to affordable housing, such as local opposition to developments. Efforts to address fair housing issues are included.

Strategic Plan Section 60 discusses homeless strategies, including street outreach, shelter support, and rapid re-housing, among other strategies. ESG, HOPWA, and Section 811 are included in this strategy.

Strategic Plan Section 65 discusses how the CPD Programs address lead-based paint hazards and communicate the requirements in their procedures.

Strategic Plan Section 70 discusses how the CPD Programs add to the State's plans to reduce the number of households in poverty.

Strategic Plan Section 75 discusses homelessness, barriers to affordable housing, and reducing poverty-level households in colonias. Texas sets aside 12.5% of the CDBG Program for colonias.

Finally, Strategic Plan Section 80 discusses how the State will monitor the activities in the Consolidated Plan.

SP-10 Geographic Priorities – 91.315(a)(1)

Geographic Area

Table 1 - Geographic Priority Areas

1	Area Name:	State of Texas
	Area Type:	State Service Area
	Other Target Area Description:	State Service Area
	HUD Approval Date:	
	% of Low/ Mod:	
	Revital Type:	
	Other Revital Description:	
	Identify the neighborhood boundaries for this target area.	State of Texas.
	Include specific housing and commercial characteristics of this target area.	Described in the Needs Assessment of the 2015-2019 State of Texas Consolidated Plan.
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	Described in the Process Chapter of the 2015-2019 State of Texas Consolidated Plan.
	Identify the needs in this target area.	Described in the Needs Assessment of the 2015-2019 State of Texas Consolidated Plan.
	What are the opportunities for improvement in this target area?	Described in the Needs Assessment and Market Analysis of the 2015-2019 State of Texas Consolidated Plan.
Are there barriers to improvement in this target area?	Described in the Needs Assessment and Market Analysis of the 2015-2019 State of Texas Consolidated Plan.	

General Allocation Priorities

Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)

TDHCA and TDA do not provide priorities for allocating investment geographically to areas of minority concentration as described in 24 CFR §91.320(d).

HOME Program Geographic Priorities

Texas Government Code §2306.111 requires that TDHCA use a Regional Allocation Formula ("RAF") to allocate its HOME funding. The RAF uses the data from the Census Bureau to prioritize funding, such as: number of persons who live at or under 200% of the poverty line; number of households with rent or

mortgage payment that exceeds 30% of income; number of units with more than one person per room; and vacant units for rent or for sale. Both homeowner data and renter data are used in the RAF. This formula captures data on all Texas counties and accordingly reflects geographic priorities.

Additionally, Texas Government Code §2306.111 specifies that TDHCA shall expend at least 95% of its HOME funds for the benefit of areas not in Participating Jurisdictions ("PJs"). Therefore, need and availability in the areas that are PJs are not prioritized in the RAF. The RAF distributes all HOME funds from the annual allocation except for federal- and state-mandated activities, such as CHDO Operating Expenses, housing programs for persons with disabilities, and the Contract for Deed Conversion Program. The RAF assessed, revised as appropriate, and published annually, after the public comment process, at <https://www.tdhca.state.tx.us/housing-center/pubs-plans.htm>.

ESG Geographic Priorities

Beginning with Federal Fiscal Year 2013, ESG funds have been prioritized for each of the HUD-designated Continuum of Care ("CoC") Regions. This is according to a combination of the CoC region's proportionate share of the total homeless population (based on the Point-in-Time count submitted to HUD by the CoCs) and the proportionate share of people living in poverty (based on the American Community Survey). For the purposes of distributing funds, the percentage of statewide homeless population is weighted at 75% while the percentage of statewide population in poverty is weighted at 25%.

CDBG Geographic Priorities

Texas CDBG Funds for projects under the Community Development ("CD") Fund are allocated by formula to 24 regions based on the methodology that HUD uses to allocate CDBG funds to the non-entitlement state programs (21.71% of annual allocation), along with a state formula based on poverty and unemployment (40% of annual allocation). In addition, 12.5% of the annual allocation is allocated to projects under the Colonia Fund categories, which must be expended within 150 miles of the Texas-Mexico border. Colonia SHC funds are allocated by statute among five Texas-Mexico border counties, as well as in other border counties that are determined to be economically distressed. Allocations for each SHC correspond to contract activities that are proposed by the SHCs and the Colonia Resident Advisory Committee ("C-RAC").

HOPWA Geographic Priorities

Texas HOPWA funding allocations are geographically distributed across the state to the 26 HIV-Service Delivery Areas ("HSDA") based on factors such as population with HIV and unmet need. Texas has 254 counties and can carry out activities anywhere in the state. Texas serves all the rural counties and is a wrap-around for the federally-designated six Metropolitan Statistical Areas ("MSAs") that receive direct HOPWA funding from HUD, which means there is some overlap of counties served by both the MSA and the state. The six directly-funded MSAs are Austin, Dallas, Fort Worth, Houston, San Antonio, and El Paso, and counties under each MSA are subject to change. DSHS allocates funding to meet the needs of PLWH in Texas, many of whom reside in areas of minority concentration; most PLWH are racial and ethnic minorities.

SP-25 Priority Needs – 91.315(a)(2)

Priority Needs

Table 2 – Priority Needs Summary

1. Priority Need Name	Rental Assistance
Priority Level	High
Population	<p>Income Level: Extremely Low Low Moderate</p> <p>Family Types: Large Families Families with Children Elderly Public Housing Residents</p> <p>Homeless Subpopulations: Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth</p> <p>Non-homeless Special Needs: Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence</p>
Geographic Areas Affected	State Service Area
Associated Goals	Tenant-Based Rental Assistance with HOME funding HOPWA Tenant-Based Rental Assistance HOPWA Permanent Housing Placement Assistance
Description	Rental Assistance includes security and utility deposits, and rental subsidies, usually while the household engages in a self-sufficiency program.

<p>Basis for Relative Priority</p>	<p>The Needs Assessment in Section 10 and Section 30 established that cost burden was a housing problem that by far affected the most households with housing problems and were within 0-100% Area Median Income ("AMI"). Needs Assessment Section 10, Table 3, "Housing Problems", shows that 83% of renters with housing problems and income between 0-100% AMI had cost burden (i.e., spending more than 30% of income on rent) or severe cost burden (i.e., spending 50% or more of income on rent). In the answer to the question in that section "What are the most common housing problems", it was found that renters with housing problems in the 0-30% AMI category experienced a severe cost burden 5% higher than homeowners with housing problems, and renters with housing problems in the >30-50% and >50-80% AMI categories experienced non-severe cost burden 9-17% higher than homeowners with housing problems.</p> <p>The Market Analysis Section 15 shows that renters do not have access to enough affordable rental units. First, in the answer to the question in that section "Is there sufficient housing for households at all income levels?", there is a discussion of housing mismatch which demonstrates that higher income households often reside in market-rate units that could be affordable to the lowest-income households. Low-income households (e.g., 0-80% AMI) make up only 56% of all households occupying housing affordable to them. Even though there appears to be a large number of affordable units, this mismatch is one issue that creates cost burden. Also, in the answer to the question in that section "How is affordability of housing likely to change considering changes to home values and/or rents?", even with the increase in median incomes, the rates of cost burden for all renters remained steady over 5 years at 44%. Rental assistance would help to lower this rate of cost burden.</p>
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2. Priority Need Name	Production of new units
Priority Level	High
Population	<p>Income Level: Extremely Low Low Moderate</p> <p>Family Types: Large Families Families with Children Elderly Public Housing Residents</p> <p>Homeless Subpopulations: Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth</p> <p>Non-homeless Special Needs: Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence Other: colonia residents, farmworkers</p>
Geographic Areas Affected	State Service Area
Associated Goals	Construction of single family housing Households in new/rehabilitated multifamily units CDBG Colonia Funds

<p>Description</p>	<p>Multifamily development of new units for the construction of a rental development, which will have units to be offered at below-market-rate rents.</p> <p>CHDOs could be eligible to receive funding for the new construction of affordable single-family homes. New single-family homes must follow certain design and quality requirements and must be sold to low-income homebuyers after completion of construction. The production of new units may be paired with permanent financing to qualified households if needed.</p> <p>Production also includes Self-Help Housing. The Bootstrap Loan Program (“Bootstrap”) allows for self-help housing construction to provide very low-income families—including persons with special needs, such as colonia residents—an opportunity to purchase or refinance real property on which to build new housing or repair their existing homes through "sweat equity." Household income may not exceed 60% of AMI. All Bootstrap households provide at least 65% of the labor necessary to build or rehabilitate their housing under the supervision and guidance of a state-certified administrator or Colonia Self-Help Center. The maximum Bootstrap loan may not exceed \$45,000 per household.</p> <p>The Colonia SHCs provides targeted colonias in border counties with opportunities to improve housing and increase personal capacity for homeownership. The SHCs provide housing services in the form of new construction, reconstruction, rehabilitation, small repairs, tool lending, construction skills training, and utility connections. Colonia residents are able to repair and construct their own and others’ housing under the guidance of qualified nonprofit housing developers who provide training in construction methods and homeownership. SHC community development activities include homeownership education, access to and training in computers/technology, consumer rights education, financial literacy, and solid waste disposal assistance.</p>
<p>Basis for Relative Priority</p>	<p>As previously established in the "Basis for Relative Priority" for the Rental Assistance Priority Need, the most common housing problem for renters is distinctly cost burden. Creation of new multifamily units that offer reduced rents works hand-in-hand with rental assistance, since both types of assistance alleviate cost burden.</p> <p>Regarding the need for more affordable single-family units, the Needs Assessment Section 10 established that cost burden was a housing problem that by far affected the most homeowners that had housing problems and were within 0-100% AMI. Needs Assessment Section 10, Table 3, "Housing Problems", shows that 87% of homeowners with housing problems and incomes between 0-100% AMI had cost burden (i.e., spending more than 30% of income on mortgage) or severe cost burden (i.e., spending 50% or more of income on mortgage). In the answer to the question in that section "What are the most common housing problems", it was found that homeowners with housing problems in the 0-30% and >80-100% AMI categories experienced a cost burden 7-10% higher than renters with housing problems.</p> <p>Also, Needs Assessment Section 30 discussed the needs of colonia residents, who live in colonias with reduced infrastructure and poor housing. New affordable units would</p>

	<p>provide options for persons who live in substandard housing.</p> <p>Finally, the Market Analysis Section 15 showed how the affordability of homes for households with median family income compared to the income required to qualify for an 80%, fixed-rate mortgage to purchase a median priced home in most Multiple Listing Services ("MLS") has gone down from 2011 to 2013. When affordability is going down, the need for affordable units increases.</p>
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3. Priority Need Name	Acquisition of existing units
Priority Level	High
Population	<p>Income Level: Extremely Low Low Moderate</p> <p>Family Types: Large Families Families with Children Elderly Public Housing Residents</p> <p>Non-homeless Special Needs: Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence Other: colonia residents</p>
Geographic Areas Affected	State Service Area
Associated Goals	Homebuyer assistance with possible rehabilitation CDBG Colonia Funds
Description	<p>Acquisition of existing units would provide funds for downpayment and closing costs. Homebuyer assistance could be paired with rehabilitation, if the home has architectural barriers for persons with disabilities. Homebuyer assistance can also include contract for deed conversions.</p> <p>Finally, TDHCA's Colonia SHCs provides targeted colonias in border counties with opportunities to improve housing and increase personal capacity for homeownership and employment. The SHCs provide housing services in the form of new construction, reconstruction, rehabilitation, small repairs, contract for deed conversions, tool lending, construction skills training, and utility connections. Colonia residents are able to repair and construct their own and others' housing under the guidance of qualified nonprofit housing developers who provide training in construction methods and homeownership. SHC community development activities include homeownership education, access to and training in computers/technology, consumer rights education, financial literacy, and solid waste disposal assistance.</p>

<p>Basis for Relative Priority</p>	<p>As was already established in the "Basis for Relative Priority" for the Production of new units, the most common housing problem for owners is cost burden. Assisting homebuyers with the affordable acquisition of units will help address cost burden for potential homebuyers.</p> <p>As established by Needs Assessment Section 30, unscrupulous practices regarding the use of contracts for deed are often detrimental to the buyers of properties. By converting those contracts for deed to traditional mortgages, the units that were unaffordable through the high interest rates in the contracts for deed become affordable through mortgages, while also providing the homeowner with the full rights of homeownership.</p> <p>Also, as established by Needs Assessments Section 45, persons with disabilities may need assistance with barrier removal. The pairing of homebuyer assistance, which helps make the home affordable, and barrier removal, which allows the person with a disability to function in the home, addresses a housing and special need.</p>
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4. Priority Need Name	Rehabilitation of housing
Priority Level	High
Population	<p>Income Level:</p> <p>Extremely Low Low Moderate</p> <p>Family Types:</p> <p>Large Families Families with Children Elderly Public Housing Residents</p> <p>Homeless Subpopulations:</p> <p>Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth</p> <p>Non-homeless Special Needs:</p> <p>Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence Other: colonia residents</p>
Geographic Areas Affected	State Service Area
Associated Goals	Homeless Goals Rehabilitation of single family housing Households in new/rehabilitated multifamily units CDBG Colonia Funds

<p>Description</p>	<p>Rehabilitation is the act of making repairs designed to address health and safety concerns, as well as local code requirements, and reconstruction is rebuilding either because it is not cost feasible to repair the home because of the extent of needed repairs, or because a home has been damaged or destroyed beyond repair.</p> <p>Rehabilitation or reconstruction of single-family units involves construction activities on owner-occupied housing on the same site. Activities intended to address rehabilitation needs can also result in new construction of housing units when they replace a previous, existing housing unit. Also permitted are (1) instances where an existing owner-occupied manufactured housing unit is replaced with a site-built house or another manufactured housing unit on the same site; (2) an existing housing unit is demolished and rebuilt on a lot located outside a floodplain or away from other environmental hazards; or (3) when a housing unit is replaced because it has become uninhabitable as a result of disaster or condemnation by local government.</p> <p>Rehabilitation of multifamily units varies from property to property depending on specific needs, and could include exterior and/or interior work. A definition of rehabilitation can be found in the Uniform Multifamily Rules 10 Texas Administrative Code, §10.3.</p> <p>Rehabilitation and reconstruction includes self-help housing, which involves on-site technical assistance to low- and very low-income individuals for outreach and education; housing rehabilitation; construction skills training; tool library access for self-help construction; housing finance; credit and debt counseling; grant writing; contract-for-deed conversions; and capital access for mortgages.</p> <p>Finally, rehabilitation may include renovation or major rehabilitation of an emergency shelter or conversion of a building into an emergency shelter.</p>
<p>Basis for Relative Priority</p>	<p>As was already established in the "Basis for Relative Priority" for the Production of new units, the most common housing problem for renters and owners is cost burden. The Needs Assessment Section 10 shows that substandard housing is the least commonly identified housing problem, experienced by only 2% of the population under 100% AMI. However, the Market Assessment Section 15 notes the importance of local economies on the housing markets. While substandard housing is not as common of a problem for Texas as a whole compared to other housing problems, in some communities substandard housing may be a substantial problem. This is true in rural areas and especially true in colonias, as noted in Needs Assessment Section 30. Colonias are unique in that they have large amounts of substandard housing but, unlike much of the rest of Texas, have more affordable housing, as described in Market Analysis Section 50.</p> <p>Rehabilitation of multifamily units will help ensure affordability for renters and, as new units are added to the State's affordable housing stock, provide more affordable rental choices. Rehabilitation for single-family housing in colonias is strongly supported by the Needs Assessment and Market Analysis. Rehabilitation outside the colonias may be supported by local markets, as illustrated by comments during the consultation of the 2015-2019 State of Texas Consolidated Plan from TICH and TDCJ (Market Analysis</p>

Section 20).

Although homeowner cost burden is measured in the Needs Assessment Chapter by comparing the mortgage and utility payments to the income of the homeowner, an analysis of home rehabilitation or reconstruction compared to income of the homeowner may show a substantial hardship for homeowners. Assistance of up to \$85,000, which is the highest amount allowable in the HOME Single Family rehabilitation/reconstruction activity in 2014, would result in a loan of similar size as some mortgages as generated through a private financial institution. If the homeowner already has a mortgage or has income between 0-80% AMI, this large loan payment could create a burden. In this way, rehabilitation could affect affordability for the homeowner. HOME's Single-Family rehabilitation/reconstruction program helps sustain affordability, because it repairs or replaces older housing stock through deferred, forgivable loans or grants with new, more energy-efficient housing stock, thus reducing potential cost burden. Though the focus in the Needs Assessment and Market Analysis is on affordability and availability, it should be noted that rehabilitation would also improve the safety of the homeowner.

Because of these factors and particularly the needs inside colonias, HOME funds are made available annually for single family rehabilitation activities. TDHCA will continue to evaluate annually whether HOME funds should be directed to other activities that could more directly address common housing problems, such as cost burden, while ensuring that the rural parts of the state have access address the most common housing problems they may be experiencing based on geography or population.

Regarding the rehabilitation of emergency shelters, Needs Assessment 40 shows that there are 16,336 unsheltered homeless on a given night. Maintaining the safety and quality of shelters will continue to warrant the rehabilitation of emergency shelters when possible.

5. Priority Need Name	Supportive Services for Persons with HIV/AIDS
Priority Level	High
Population	<p>Income Level: Extremely Low Low Moderate</p> <p>Family Types: Large Families Families with Children Elderly Public Housing Residents</p> <p>Homeless Subpopulations: Persons with HIV/AIDS</p> <p>Non-homeless Special Needs: Persons with HIV/AIDS and their Families</p>
Geographic Areas Affected	State Service Area
Associated Goals	HOPWA-Funded Supportive Services
Description	The Supportive Services program provides case management, basic telephone service, and assistance to purchase smoke detectors to eligible individuals living with HIV and their families. Case managers also assist HOPWA clients with comprehensive housing plans and make referrals such as medical care, mental health and/or substance abuse treatment, and other services based on the client's individual needs.k
Basis for Relative Priority	<p>The Market Analysis states that the State HOPWA program provides tenant-based rental assistance; short-term rent, mortgage, and utilities assistance, and some project sponsors provide financial assistance with security deposits and credit checks. HOPWA-eligible individuals who have exited from an institution into the State's HOPWA program receive supportive services from a case manager which include a comprehensive housing plan and linkage and referrals to health professionals as needed to assist in keeping the client stable and housed.</p> <p>HOPWA eligibility requires an HIV diagnosis and income at 80% or below AMI. HIV disproportionately affects racial/ethnic minorities and males. At the end of 2012, 72,932 persons were living with HIV in Texas, many at incomes below the poverty level, and the number continues to rise every year. According to the DSHS 2012 Texas STD and HIV Integrated Epidemiologic Profile, Texas had the 8th highest rate (19.7/100,000 population) of new HIV diagnoses in the nation in 2011. Housing is a critical need for PLHW and their families.</p>

6. Priority Need Name	Homeless Outreach
Priority Level	High
Population	<p>Income Level: Extremely Low Low Moderate</p> <p>Family Types: Large Families Families with Children Elderly</p> <p>Homeless Subpopulations: Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth</p> <p>Non-homeless Special Needs: Other: youth aging out of foster care</p>
Geographic Areas Affected	State Service Area
Associated Goals	Homeless Goals
Description	<p>Offering essential services helps unsheltered homeless persons connect with emergency shelter, housing, or critical services, and provides urgent, non-facility-based care to those who are unwilling or unable to access emergency shelter, housing, or an appropriate health facility.</p> <p>Outreach includes engagement, case management, emergency health and mental health services, transportation, and services for special needs populations.</p> <p>Case Management includes using a centralized assessment system, conducting evaluations, counseling, coordinating services, obtaining local benefits, monitoring program participant progress, providing information and referrals, and developing an individualized housing.</p> <p>Emergency health services include assessing a program participant's health problems and developing a treatment plan while helping to understand their health needs.</p>

	<p>Mental health services are also provided.</p> <p>Transportation assistance is allowed for the homeless population and outreach providers.</p> <p>Outreach to special needs population will vary based on the special need and will be specified in Strategic Plan Section 45.</p>
<p>Basis for Relative Priority</p>	<p>Needs of individuals and families at risk of homelessness are established in Needs Assessment Section 10. Along with having low-incomes, many individuals and families at risk of homelessness have co-occurring issues, such as needs for essential services like child care or education. Because of these co-occurring issues, outreach to prevent homelessness for these populations is essential.</p> <p>Special needs populations described in Needs Assessment Section 45 have difficulty retaining housing in unique ways and are often vulnerable to homelessness. These populations need outreach tailored to them.</p>

7. Priority Need Name	Emergency shelter and transitional housing
Priority Level	High
Population	<p>Income Level: Extremely Low Low Moderate</p> <p>Family Types: Large Families Families with Children Elderly</p> <p>Homeless Subpopulations: Rural Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth</p> <p>Non-homeless Special Needs: Other: youth aging out of foster care</p>
Geographic Areas Affected	State Service Area
Associated Goals	Homeless Goals
Description	Emergency shelter means the provision of a temporary shelter for homeless persons which does not require occupants to sign leases or occupancy agreements. Emergency shelters include shelters that provide overnight accommodation services as well as shelters that provide a space to stay during day time hours. Emergency shelters can offer essential services, such as case management, child care, education services, employment assistance, job training, outpatient health services, legal services, life training skills, mental health services, substance abuse treatment services, transportation, and services for special populations.
Basis for Relative Priority	As was already established in the "Basis for Relative Priority" for Rental Assistance, the most common housing problem is cost burden. As discussed in Needs Assessment Section 10, certain characteristics, such as cost burden, can lead to instability of housing and risk of homelessness. With the 16,336 estimated number of homeless persons unsheltered on a given night listed in the Needs Assessment Section 40, the need for emergency shelter becomes apparent.

8. Priority Need Name	Rapid Re-housing
Priority Level	High
Population	<p>Income Level: Extremely Low Low</p> <p>Family Types: Large Families Families with Children Elderly Public Housing Residents</p> <p>Non-homeless Special Needs: Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence Other: youth aging out of foster care</p>
Geographic Areas Affected	State Service Area
Associated Goals	Homeless Goals
Description	Rapid re-housing includes housing relocation, stabilization services, and short-and/or medium-term rental assistance as necessary to help a homeless individual or family move as quickly as possible into permanent housing and achieve stability in that housing. Rapid re-housing may involve providing last month's rent, rental application fees, security deposits, utility deposits, utility payments, and moving costs. Services provided for homelessness prevention may involve housing search and placement, housing stability case management, mediation, legal services for subject matters such as landlord/tenant disputes, and credit repair.
Basis for Relative Priority	As established in Needs Assessment Section 40, a continuum of care approach for homeless populations necessitates more options than only providing emergency shelter. In addition, Market Analysis Section 30 discusses the cost savings of rapid re-housing.

9. Priority Need Name	Homelessness Prevention
Priority Level	High
Population	<p>Income Level: Extremely Low Low</p> <p>Family Types: Large Families Families with Children Elderly Public Housing Residents</p> <p>Non-homeless Special Needs: Persons with HIV/AIDS and their Families Other: youth aging out of foster care</p>
Geographic Areas Affected	State Service Area
Associated Goals	Homeless Goals HOPWA Tenant-Based Rental Assistance HOPWA Short-Term Rent, Mortgage, & Utilities Asst HOPWA Permanent Housing Placement Assistance
Description	<p>Homelessness prevention includes using relocation and stabilization services and short- and/or medium-term rental assistance to prevent an individual or family from moving into an emergency shelter or another place. Homelessness prevention may involve providing last month's rent, rental application fees, security deposits, utility deposits, utility payments, and moving costs. Services provided for homelessness prevention may involve housing search and placement, housing stability case management, mediation, legal services for subject matters such as landlord/tenant disputes, and credit repair.</p> <p>The Texas HOPWA program prevents homelessness and stabilizes housing for PLWH in Texas with housing subsidy assistance activities and supportive services. TBRA provides tenant-based rental assistance to eligible individuals until they are able to secure other affordable and stable housing. STRMU provides emergency short-term rent, mortgage, and utility payments to eligible individuals for a maximum of 21 weeks of assistance in a 52-week period. PHP provides assistance for housing placement costs which may include application fees, related credit checks, and reasonable security deposits necessary to move persons into permanent housing. All of these activities, along with supportive services, helps clients maintain affordable and stable housing, reduces risk of homelessness, and improves access to health care and supportive services.</p>

<p>Basis for Relative Priority</p>	<p>As established in Needs Assessment Section 40, a continuum of care approach for homeless populations necessitates more options than providing emergency shelter. Market Analysis Section 30 discusses the cost savings of homelessness prevention.</p> <p>PLWH and their families have a critical need for housing in Texas. Stable housing significantly increases rates of improved health outcomes for this population. HOPWA eligibility requires an HIV diagnosis and income at 80% or below AMI. HIV disproportionately affects racial/ethnic minorities and males. At the end of 2012, 72,932 persons were living with HIV in Texas, many at incomes below the poverty level, and the number continues to rise every year. "In 2011...Texas had the 8th highest rate (19.7/100,000 population) of new HIV diagnoses in the nation" (Texas Department of State Health Services, 2014).</p>
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10. Priority Need Name	Public Improvements and Infrastructure
Priority Level	High
Population	<p>Income Level:</p> <p>Extremely Low Low Moderate</p> <p>Non-homeless Special Needs: Non-housing Community Development Other: colonia residents</p>
Geographic Areas Affected	State Service Area
Associated Goals	<p>CDBG Other Construction CDBG Economic Development CDBG Planning / Capacity Building CDBG Disaster Relief / Urgent Need CDBG Colonia Funds</p>
Description	<p>Public improvements and infrastructure include water and wastewater systems, roads/streets, and other utilities.</p> <p>SHCs in colonias include on-site technical assistance to low- and very low-income individuals and families for community development activities; infrastructure improvements; outreach and education; construction skills training; and infrastructure construction and access.</p>
Basis for Relative Priority	<p>Although the Non-Homeless Special Need category "other" does not indicate which "other" is specified in the printed version of this document, "other" in this context means colonia residents.</p> <p>The Needs Assessment shows the need for public improvements and infrastructure as a majority of the applications received for CDBG funds include improvements and/or installation of public infrastructure. This predominance demonstrates a priority need for these types of projects.</p>

11. Priority Need Name	Economic development
Priority Level	High
Population	<p>Income Level: Extremely Low Low Moderate</p> <p>Non-homeless Special Needs: Non-housing Community Development Other: colonia residents</p>
Geographic Areas Affected	State Service Area
Associated Goals	CDBG Other Construction CDBG Economic Development
Description	Economic development includes projects in support of job creation activity primarily benefiting individuals of low-to-moderate income and downtown revitalization activities to eliminate/prevent slum and blight conditions.
Basis for Relative Priority	<p>Although the Non-Homeless Special Need category "other" does not indicate which "other" is specified in the printed version of this document, "other" in this context means colonia residents.</p> <p>The Market Analysis shows that economic development is needed as growing urbanization and an increasingly competitive global environment present challenges for the economic conditions of rural, non-entitlement communities.</p>

12. Priority Need Name	Public facilities
Priority Level	High
Population	<p>Income Level: Extremely Low Low Moderate</p> <p>Non-homeless Special Needs: Non-housing Community Development Other: colonia residents</p>
Geographic Areas Affected	State Service Area
Associated Goals	<p>CDBG Other Construction CDBG Economic Development CDBG Planning / Capacity Building CDBG Disaster Relief / Urgent Need CDBG Colonia Funds</p>
Description	Public facilities include, but are not limited to neighborhood facilities such as libraries, public schools or community centers, and facilities for persons with special needs such as the homeless and senior citizens.
Basis for Relative Priority	The Needs Assessment explains how rural, non-entitlement communities frequently face choosing to utilize CDBG funds for public facilities over their public infrastructure needs. Given the importance of public facilities, CDBG is developing the Community Enhancement fund to use deobligated funds to support public facility projects in rural communities.

13. Priority Need Name	Public services
Priority Level	High
Population	Income Level: Extremely Low Low Moderate Non-homeless Special Needs: Non-housing Community Development Other: colonia residents
Geographic Areas Affected	State Service Area
Associated Goals	CDBG Other Construction CDBG Economic Development CDBG Planning / Capacity Building CDBG Disaster Relief / Urgent Need
Description	Public service activities include, but are not limited to, employment services, health services, and services for senior citizens.
Basis for Relative Priority	The Needs Assessment shows the need for public services in rural communities is frequently foregone in order to employ CDBG for fundamental public infrastructure improvements. Additionally, many rural communities lack the service providers needed to deliver such services in their communities.

Narrative (Optional)

Low-income persons with special needs include colonia residents; elderly and frail elderly populations; homeless populations and persons at risk of homelessness; persons with alcohol and substance use disorders; persons with mental, physical, intellectual, or developmental disabilities; persons with HIV/AIDS and their families; public housing residents and persons on wait lists for public housing; veterans and wounded warriors; victims of domestic violence, including persons with protections under the Violence Against Woman Act ("VAWA") (domestic violence, dating violence, sexual assault, or stalking); youth aging out of foster care; and farmworkers are considered special needs groups for housing-related priority goals. Please refer to the Needs Assessment Chapter of this document for more detailed descriptions of the need associated with special needs groups. Note that when the population is listed as "other," this could be one of three populations: colonia residents, youth aging out of foster care, and farmworkers.

SP-30 Influence of Market Conditions – 91.315(b)

Influence of Market Conditions

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	<p>Market Analysis Section 15 shows a possible housing mismatch in which lower-income Texans frequently are only able to access higher income units. In this case, TBRA can assist with that problem. TBRA allows eligible households the choice of rental units.</p> <p>HOME Use of TBRA</p> <p>The HOME Program takes into account the needs of households that have a cost burden as market conditions lead to the need for TBRA. Rental subsidy and security and utility deposit assistance is provided to tenants, in accordance with written tenant selection policies, for an initial period not to exceed 24 months. If available, additional funds may be set-aside to provide assistance beyond 24 months.</p>
TBRA for Non-Homeless Special Needs	<p>Established in the Market Analysis Section 10, some special needs populations receive priority in many programs.</p> <p>HOME Use of TBRA for People with Special Needs</p> <p>The HOME Program considers income, availability of housing, and condition of housing for persons with special needs as market conditions that lead to the need for TBRA for this population. The Needs Assessment chapter also highlights the need in Texas for special needs populations to have access to rental housing. For example, the numbers of persons with disabilities transitioning from institutional living into community-based living is increasing, creating a priority for the State of Texas. TDHCA's TBRA is critical in helping households transition back into the community. In addition, of the HOME funding that TDHCA specifically sets aside for persons with disabilities, approximately 80% of the assisted households requested TBRA in 2014; the remainder of the requests were for home repair or to purchase homes.</p> <p>HOPWA use of TBRA for People with Special Needs</p> <p>For low-income PLWH, a lack of affordable housing is an ongoing issue. Housing placement requires two and one half times the rent in income, but the cost of living is rising (i.e. increases in rent, utilities, application fees, and security deposits) while incomes remain the same or decrease.</p> <p>Housing options are further decreased by a shortage of available assistance. The Housing Choice Voucher (“HCV”) program is not offered in some cities or counties with small populations; has long or closed wait lists for potential applicants; or will not qualify clients based on undocumented immigrant status, which results in cost-shifting to the HOPWA program.</p> <p>A common issue is housing that does not meet Housing Quality Standards (“HQS”) and</p>

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
	<p>lack of landlords' willingness to improve these properties. Case managers try to place clients in housing that meets HQS, but those units are not always available or affordable.</p> <p>Also, clients are unable to afford utilities when utility rates in rural areas not established at reasonable levels, making it difficult to calculate appropriate allowances, and/or high utility costs are paid separately from the rent. TBRA has not historically paid for utilities separately from rental payments, but has the ability to do so.</p> <p>With the lack of subsidized housing, clients often stay on the city/local housing authority wait lists pending availability. Often local rents are much higher than the Fair Market Rent (“FMR”), which eliminates those geographical locations as options for affordable housing. A shortage of housing has landlords increasing prices to what the market will bear, which invariably are much higher than FMR.</p> <p>As a result, the Texas HOPWA Program offers TBRA, which provides tenant-based rental assistance to eligible individuals until they are able to secure other affordable and stable housing.</p>
New Unit Production	<p>Market Analysis Section 15 reflects that there are not enough affordable housing units available for renters. Market Analysis Section 15 also shows that there is a lack of supply of housing, at only 3.3 month supply of inventory for sale.</p> <p>HOME use of New Unit Production</p> <p>Because HOME Multifamily funds used for the production of multifamily housing are typically paired with other resources such as housing tax credits and/or conventional financing, the availability of those other resources influences the use of funds for new construction. As with any development, the cost of land, materials, and labor are also factors. Finally, the demand for the housing from not only income-eligible tenants but those who exhibit an ability to pay rent is a primary market characteristic.</p> <p>For single-family HOME funds for new unit production, the CHDOs identify the needs for new housing in their communities before they apply.</p> <p>CDBG Program use of New Unit Production</p> <p>Office of Colonia Initiatives (“OCI”) anticipates that the rise of overall construction costs stems from the increase in prices for materials, labor, and land which may cause TDHCA to increase the average amount of assistance per household. With the increased assistance per household and lower amounts of funding per household, TDHCA may decrease the number of single family households serves with new construction.</p>

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Rehabilitation	<p>While only approximately 2% of the Texas housing stock is considered substandard per Needs Assessment Section 10, almost half of the housing stock is over 30 years old per Market Analysis Section 20. Older housing stock can be associated with necessary housing repairs. In addition, Market Analysis Section 10 discusses the need for barrier removal for persons with disabilities. Finally, Needs Assessment Section 30 establishes the need for rehabilitation in colonias.</p> <p>HOME use of Rehabilitation</p> <p>When a single-family housing unit or multifamily unit is determined to be in disrepair, the unit's suitability for rehabilitation varies by program. HOME takes each housing unit on a case-by-case basis, accounting for factors such as property value, construction costs, and type of rehabilitation to determine if the unit is suitable for rehabilitation or whether the household should be offered the option to rebuild.</p> <p>ESG use of Rehabilitation</p> <p>ESG has three eligible types of rehabilitation with subtly different definitions of what is considered a suitable property. ESG considers a shelter suitable for conversion rehabilitation where the cost of rehabilitation would exceed 75% of the value of the building after conversion. A unit is suitable for major rehabilitation if the costs of rehabilitation exceed 75% of the value of the building prior to rehabilitation or conversion. Finally, ESG considers a housing unit suitable for renovation rehabilitation where the costs of rehabilitation are 75% or less of the value of the building.</p> <p>CDBG use of Rehabilitation</p> <p>To address the condition of the housing stock, the CDBG Program has established a limit of \$25,000 dollars per home and a process to select homes for rehabilitation. The CDBG Program will consider adjustments based on a specific request from the subrecipient and that household's circumstances. Vacant and abandoned housing units are not precluded from consideration. The grant recipient is responsible for establishing priority based on local housing needs.</p> <p>For the OCI, the assistance limit is \$50,000 per household for reconstruction and new construction and \$40,000 per household for rehabilitation. The OCI encourages rehabilitation assistance if the activity requires less than \$40,000 to be brought up to minimum construction standards so that the maximum number of households may be served.</p>

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Acquisition, including preservation	<p>Market Analysis Section 15 establishes that there are not enough affordable housing units available for owners. Homebuyer assistance helps ensure that homeowners purchase units that are within their means and help to make the units more affordable. In addition, Needs Assessment Section 30 discusses the abuses of contracts for deed, which may be improved by converting the contracts to traditional mortgages, resulting in acquisition of the unit.</p> <p>HOME use of Acquisition</p> <p>HOME offers homebuyer assistance and homebuyer assistance with rehabilitation for barrier removal and to bring units up to livability standards.</p> <p>CDBG use of Acquisition, Including Preservation</p> <p>OCI program assistance for acquisition comes as either a grant or a low- or 0%-interest forgivable loan. The OCI assists a market that is less likely to qualify for mortgage products at market interest rates and that use traditional underwriting criteria. This will maintain a high level of demand for affordable acquisition assistance from TDHCA.</p>

Table 3 – Influence of Market Conditions

SP-35 Anticipated Resources - 91.315(a)(4), 91.320(c)(1,2)

Introduction

CPD funding is governed by this Consolidated Plan, but the State also works to collaborate, coordinate, and layer non-CPD funding sources in order to reach more Texans and more efficiently use available funds. Programs listed in the anticipated resources narrative sections below could be used to leverage CPD funds. These include:

- 4% HTC Program;
- 9% HTC Program;
- Homeless and Housing Services Program (“HHSP”);
- Housing Trust Fund Program;
- Mortgage Credit Certificate (“MCC”) Program;
- First time homebuyer loan programs, including the My First Texas Home Program;
- Neighborhood Stabilization Program - Program Income (“NSP PI”);
- Section 8 Housing Choice Voucher (“HCV”) Program;
- Section 811 Project Rental Assistance (“PRA”) Program; and
- Tax Credit Assistance Program (“TCAP PI”) Loan Repayments.

For the programs above, the expected future funding amounts, to the extent known, are in the planning documents governing those programs. These documents can be found online at <http://www.tdhca.state.tx.us/>. The anticipated resources below are focused on CPD Programs.

TDHCA participates in numerous committees, workgroups, and councils which help TDHCA stay apprised of other potential resources to address affordable housing needs. Relationships with other federal and state agencies and local governments are extremely valuable, helping Texas agencies to coordinate housing and services and serve all Texans efficiently and effectively. TDHCA’s involvement in these committees promotes identifying opportunities to proactively pursue federal funding opportunities. TDHCA actively seeks engagement and input from community advocates, funding recipients, potential applicants for funding, and others to obtain input regarding the development of effective policies, programs and rules. Changes to funding plans are made periodically based on feedback received through these avenues.

TDHCA is the lead agency for the following workgroups:

C-RAC: C-RAC is a committee of colonia residents appointed by the TDHCA Governing Board. It advises TDHCA regarding the needs of colonia residents and the types of programs and activities which should be undertaken by the Colonia SHCs. The Colonia SHCs funds are provided to seven specific pre-determined counties which, in turn, procure organizations to operate their SHCs.

Disability Advisory Workgroup (“DAW”): The DAW augments TDHCA's formal public comment process, affording staff the opportunity to interact more informally and in greater detail with various stakeholders and to get feedback on designing more successful programs, with a specific focus on gaining insight on issues impacting persons with disabilities.

Housing and Health Services Coordination Council (“HHSCC”): HHSCC is established by Texas Government Code §2306.1091. Its duties include promoting coordination of efforts to offer Service-Enriched Housing and focusing on other cross-agency efforts.

Texas Interagency Council for the Homeless (“TICH”): The TICH was statutorily created in 1989 to coordinate the State’s homeless resources and services. The TICH consists of representatives from eleven state agencies. TDHCA, as the primary source for state homelessness funding, provides administrative and planning support to the TICH.

Weatherization Assistance Program Planning Advisory Committee (“WAP PAC”): The WAP PAC is comprised of a broad representation of organizations and agencies and provides balance and background related to the weatherization and energy conservation programs at TDHCA.

The descriptions of the collaborations for DSHS and TDA are in the Discussion question of this section below.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of Con Plan: \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition					\$215,250,000	TDA's CDBG Program funds community and economic development, excluding the colonia set-aside. Communities may also coordinate CDBG funding with U.S. Department of Agriculture's ("USDA") Rural Development funds or Texas Water Development Board's ("TWDB") State Revolving Fund.
		Admin and Planning						
		Economic Development						
		Housing						
		Public Improvements						
		Public Services	\$53,812,500	\$2,500,000	\$13,000,000	\$69,312,500		

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of Con Plan: \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG Colonias Set-aside	public - federal	Acquisition Admin and Planning Homebuyer assistance Homeowner rehab Public Improvements Public Services	\$6,119,665	\$0	\$0	\$6,119,665	\$30,598,325	<p>The Colonia Set-Aside is used both by TDA and TDHCA for goals described in the Strategic Plan Section 45. The Colonia Economically Distressed Areas Program ("CEDAP") Legislative Set - Aside leverages funding from the TWDB's Economically Distressed Areas Program. TDHCA's Office of Colonia Initiatives ("OCI") administers a portion of the CDBG Colonia Set-Aside through its Colonia SHCs. Also, the Housing Trust Fund, which is funded through Texas General Revenue, administers the Texas Bootstrap Loan Program, which is also available to SHCs. Finally, the Housing Trust Fund also provides the Contract for Deed Conversion Program Assistance Grants are two types of grants that support eligible nonprofits and units of local government in assisting eligible colonia households with incomes 60% or less of the AMI to convert their contracts for deeds to warranty deeds.</p>

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of Con Plan: \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	\$24,300,000	\$3,000,000	\$0	\$27,300,000	\$109,200,000	TDHCA's HOME Program goals are described in the Strategic Plan Section 45 for multifamily and single family activities. Single family HOME homebuyer activity may be coordinated with TDHCA's My First Texas Home Program, which can supplement down payment assistance, and the MCC Program, which provides a yearly tax credit of up to \$2,000 annually that reduced the homebuyers' federal income tax liability. HOME Multifamily Development Funds can be layered with 4% HTC's and 9% HTC's. In addition, TDHCA's Section 811 PRA, a project-based supportive housing program for persons with disabilities, and TDHCA's Section 8 HCV may be used within HOME developments. Starting in 2015, TDHCA's TCAP Loan Repayments and NSP PI may be used to supplement or support multifamily and single-family HOME activities starting in 2015. In addition, TDHCA also develops rules that govern all multifamily programs, including the HOME Multifamily Development Program, known as the Uniform Multifamily Rules.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of Con Plan: \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOPWA	public - federal	Permanent housing in facilities Permanent housing placement Short term or transitional housing facilities STRMU Supportive services TBRA	\$2,922,632	\$0	\$0	\$2,922,632	\$11,690,528	DSHS' HOPWA state formula funds the following activities: TBRA; STRMU; PHP; and Supportive Services. Project Sponsors leverage available funds from Ryan White and State Services grants to assist clients with housing needs, medical and non-medical case management, emergency utility assistance, mental health, transportation, and nutritional services to address the needs of eligible clients.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of Con Plan: \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	\$8,239,076	\$0	\$0	\$8,239,076	\$41,195,380	TDHCA's ESG funds are awarded via contract to Subrecipient agencies that provide emergency shelter, homelessness prevention, rapid rehousing, and Homeless Management Information Systems ("HMIS") activities. HHSP is Texas state general revenue funding for the eight largest cities to provide flexibility to undertake activities that complement ESG activities. Note that not all ESG direct recipients in Texas are HHSP grantees.

Table 4 - Anticipated Resources

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

HOME Program Leverages and Provides Match

HOME multifamily development is most often used to leverage with the HTC Program, which was created by the Tax Reform Act of 1986 and authorizes 9% low-income housing tax credits in the amount of \$2.30 per capita for each state, and 4% low-income housing tax credits in amounts linked to the usage of the state’s cap for issuance of tax exempt bond to finance affordable housing development. In Texas, this equates to approximately \$61,400,000 in 9% tax credits available to be awarded by TDHCA annually. These credits may be claimed each year for ten years and this represents potential tax credit value on the magnitude of \$610,000,000. The tax credits are syndicated to limited partner investors to yield cash for use in eligible development activities. Currently typical syndication rates range between 92% and 95%. TDHCA must develop a Qualified Allocation Plan (“QAP”) for the selection of eligible developments to provide housing for the low-income tenants. HOME provides increased leverage, allowing the property owners to utilize fewer tax credits and less private debt and local funding, therefore providing more efficient use of resources.

Matching requirements for the HOME Multifamily Development Program will be met through the Rules that establish the awardee's minimum amount of match as 5% of the award amount. Match comes in the form of donated labor and materials, donated professional services from an architect or engineer, grants from cities or nonprofits, and waived fees by municipalities. Also, TDHCA is planning to increase match requirements for single family activities to more effectively use limited funding.

ESG Program Leverages and Provides Match

In 2011, the Texas Legislature statutorily created the HHSP statute and funded it with General Revenue. Through HHSP, the State allocates funds into the eight largest cities in Texas to support services to homeless individuals and families. These funds are sometimes used as match for either State or local ESG funding.

To meet the ESG match requirement, TDHCA includes match as part of the application process used with its Subrecipients. Subrecipient agencies are required to match 100% of their ESG award. A Subrecipient that is unable to match the award is eligible to apply to TDHCA for a match waiver of up to \$100,000. However, these requests have been quite rare. In coming ESG program years, TDHCA will actively determine which organization(s) will benefit from the match waiver.

HOPWA Leverages and Provides Match

Texas HOPWA does not have program income but leverages funds whenever possible. Project Sponsors leverage available funds from Ryan White and State Services grants, private funding sources, foundations, and local assistance to help clients. AAs do not receive administrative funds from DSHS, so those costs are leveraged from other funding sources.

CDBG Leverages and Provides Match

Nearly 80% of Texas CDBG grants include local matching fund commitments. Matching funds are required for certain grants, while other grants award points to encourage local match; a sliding scale allows smaller communities to contribute less match funding than larger communities.

Match funds may be provided by the applicant, or by a water or sewer utility benefiting from the project. Economic development projects benefiting private business require 1-for-1 match commitment, with the business most often providing this substantial match.

Recent updates to the Colonia SHC Program rules have capped program assistance at \$50,000 per household for reconstruction and new construction, and \$40,000 per household for rehabilitation. These limits encourage administrators to leverage their funds with other resources as well as assist more households than in prior years.

If appropriate, describe publicly owned land or property located within the state that may be used to address the needs identified in the plan

The Texas General Land Office manages state owned lands and mineral rights totaling approximately 13 million acres. Much of this is leased for the benefit of the Permanent School Fund, an endowment fund established in 1876 for the benefit of Texas public school education. There is currently no plan to use state owned land for affordable housing or community development goals; however, local jurisdictions occasionally donate land or property in support of activities designed to address the needs identified in the plan as part of their contribution to locally administered programs.

Discussion

Continuing with the discussion of collaboration begun in the Introduction of this section, DSHS is the lead for several HIV-related councils and workgroups which provide opportunities for collaboration and resource sharing across agencies, providers, and other pertinent stakeholders to assist PLWH in Texas. Some of the initiatives are Inter-Agency Council on HIV & Hepatitis, the Texas Black Women's Initiative, the Test Texas Coalition, and the Texas HIV Syndicate. The Texas HIV Syndicate is an integrated HIV prevention and care planning body made up of roughly 100 organizational leaders representing the full continuum of HIV engagement. The Texas HIV Syndicate uses the Texas HIV Plan as a framework to

develop strategies that enhance and expand on prevention and care activities across the State. Texas HIV Syndicate members develop policy recommendations, best practice models, coordination strategies, and promote innovation in HIV prevention and treatment. DSHS also holds a biennial HIV/Sexually Transmitted Disease ("STD") conference, attended by all DSHS contractors and subrecipients in addition to community leaders, health and HIV professionals, and many other essential stakeholders. Many of the DSHS contractors are also HOPWA providers. This year, the conference is August 19-21, 2014 in Austin, and invitations for two waived registrations have been extended to HUD. The goal of the Texas HIV/STD Conference is to enhance the responsiveness of people and systems supporting the spectrum of HIV/STD prevention and treatment services in Texas, including: Awareness; Targeted Prevention; Diagnosis; Linkage to Care; Maintenance in Care; and Suppression of Disease.

DSHS' Epidemiology and Surveillance Branch is responsible for reporting HIV/AIDS, STD, and tuberculosis ("TB") surveillance and epidemiologic data for the State of Texas, which includes data submission to the Centers for Disease Control and Prevention ("CDC"). This data is subsequently used by HUD to determine HOPWA formula allocations. This data is also leveraged to provide support to planning, development, implementation, and evaluation of HIV/AIDS, STD, and TB prevention and services programs, including HOPWA.

Finally, TDA participates in the following workgroups:

Texas Water Infrastructure Coordination Committee ("TWICC"): TWICC is a voluntary organization of federal and state funding agencies and technical assistance providers that address water and wastewater needs throughout the State. TDA participates in TWICC to coordinate efforts to leverage funds.

Secretary of State's Colonia Workgroup: The Colonia Workgroup consists of federal and state funding agencies and the Texas Secretary of State's colonia ombudsmen. The group addresses current and future infrastructure improvements in colonias, focusing on coordination of resources and information. TDHCA is also a member of this workgroup.

Drought Preparedness Council: The Council was authorized and established by the 76th Texas Legislature in 1999, and is responsible for assessment and public reporting of drought monitoring and water supply conditions, along with other duties.

These workgroups, committees, and councils help to strengthen communication between state agencies as well as provide opportunities to layer or combine funding sources.

SP-40 Institutional Delivery Structure – 91.315(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
San Antonio Metropolitan Ministries	Nonprofit organizations	Homelessness	Other
Maverick County Hospital District	Subrecipient	Non-homeless special needs	Other
Victoria City-County Health Department	Subrecipient	Non-homeless special needs	Other
Alamo Area Resource Center	Subrecipient	Non-homeless special needs	Other
Community Action, Inc. of Hayes, Caldwell, & Blanco Counties	Subrecipient	Non-homeless special needs	Other
United Way of Greater Fort Hood	Subrecipient	Non-homeless special needs	Other
Waco/McLennan County Public Health District	Subrecipient	Non-homeless special needs	Other
Unity Partners dba Project Unity	Subrecipient	Non-homeless special needs	Other
Shannon Supportive Health Services	Subrecipient	Non-homeless special needs	Other
Your Health Clinic	Subrecipient	Non-homeless special needs	Other
Dallas County Health and Human Services	Subrecipient	Non-homeless special needs	Other
Triangle Aids Network	Subrecipient	Non-homeless special needs	Other
Health Horizons of East Texas	Subrecipient	Non-homeless special needs	Other
AIDS Foundation Houston	Subrecipient	Non-homeless special needs	Other
Special Health Resources	Subrecipient	Non-homeless special needs	Other
Panhandle AIDS Support Organization	Subrecipient	Non-homeless special needs	Other
Permian Basin Community Centers	Subrecipient	Non-homeless special needs	Other
South Plains Community Action Association	Subrecipient	Non-homeless special needs	Other
Sun City Behavioral Health Care	Subrecipient	Non-homeless special needs	Other
City of Laredo Health Department	Subrecipient	Non-homeless special needs	Other

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
Valley AIDS Council	Subrecipient	Non-homeless special needs	Other
Coastal Bend Wellness Foundation	Subrecipient	Non-homeless special needs	Other
Big Country AIDS Resources (BCAR)	Subrecipient	Non-homeless special needs	Other
AIDS Outreach Center	Subrecipient	Non-homeless special needs	Other
Bexar County	Other	Non-homeless special needs	Region
Brazos Valley Council of Governments	Other	Non-homeless special needs	Region
Brazos Valley Council of Governments	Regional organization	Economic Development Non-homeless special needs public facilities public services	Region
The Houston Regional HIV/AIDS Resource Group, Inc.	Other	Non-homeless special needs	Region
StarCare Specialty Health	Other	Non-homeless special needs	Region
Tarrant County	Other	Non-homeless special needs	Region
Ark Tex Council of Governments	Regional organization	Economic Development Non-homeless special needs public facilities public services	Region
North Central Texas Council of Governments	Regional organization	Economic Development Non-homeless special needs public facilities public services	Region
Texoma Council of Governments	Regional organization	Economic Development Non-homeless special needs public facilities public services	Region

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
Permian Basin Regional Planning Commission	Regional organization	Economic Development Non-homeless special needs public facilities public services	Region
Panhandle Regional Planning Commission	Regional organization	Economic Development Non-homeless special needs public facilities public services	Region
Rio Grande Council of Governments	Regional organization	Economic Development Non-homeless special needs public facilities public services	Region
NORTEX Regional Planning Commission	Regional organization	Economic Development Non-homeless special needs public facilities public services	Region
South Plains Association of Governments	Regional organization	Economic Development Non-homeless special needs public facilities public services	Region
West Central Texas Council of Governments	Regional organization	Economic Development Non-homeless special needs public facilities public services	Region
Concho Valley Council of Governments	Regional organization	Economic Development Non-homeless special needs public facilities public services	Region

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
East Texas Council of Governments	Regional organization	Economic Development Non-homeless special needs public facilities public services	Region
Capital Area Council of Governments	Regional organization	Economic Development Non-homeless special needs public facilities public services	Region
Coastal Bend Council of Governments	Regional organization	Economic Development Non-homeless special needs public facilities public services	Region
Golden Crescent Regional Planning	Regional organization	Economic Development Non-homeless special needs public facilities public services	Region
Houston-Galveston Area Council	Regional organization	Economic Development Non-homeless special needs public facilities public services	Region
Alamo Area Council of Governments	Regional organization	Economic Development Non-homeless special needs public facilities public services	Region
Deep East Texas Council of Governments	Regional organization	Economic Development Non-homeless special needs public facilities public services	Region

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
South East Texas Regional Planning Commission	Regional organization	Economic Development Non-homeless special needs public facilities public services	Region
Lower Rio Grande Valley Development Council	Regional organization	Economic Development Non-homeless special needs public facilities public services	Region
Middle Rio Grande Development Council	Regional organization	Economic Development Non-homeless special needs public facilities public services	Region
South Texas Development Council	Other	Non-homeless special needs	Region
South Texas Development Council	Regional organization	Economic Development Non-homeless special needs public facilities public services	Region
Central Texas Council of Government	Regional organization	Economic Development Non-homeless special needs public facilities public services	Region
Heart of Texas Council of Governments	Regional organization	Economic Development Non-homeless special needs public facilities public services	Region
Family Endeavors, Inc.	Nonprofit organizations	Homelessness	Other
Youth and Family Alliance dba Lifeworks	Nonprofit organizations	Homelessness	Other
The Family Place	Nonprofit organizations	Homelessness	Other
Shared Housing Center	Nonprofit organizations	Homelessness	Other
Tarrant County Homeless Coalition	Nonprofit organizations	Homelessness	Other

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
The Salvation Army	Nonprofit organizations	Homelessness	Other
Center Against Family Violence	Nonprofit organizations	Homelessness	Other
Family Abuse Center	Nonprofit organizations	Homelessness	Other
Advocacy Outreach	Nonprofit organizations	Homelessness	Other
La Posada Providencia	Nonprofit organizations	Homelessness	Other
Mid-Coast Family Services, Inc.	Nonprofit organizations	Homelessness	Other
The Salvation Army, TX	Nonprofit organizations	Homelessness	Other
The Salvation Army - Tyler	Nonprofit organizations	Homelessness	Other
Women's Shelter of East Texas, Inc.	Nonprofit organizations	Homelessness	Other
Shelter Agencies For Families In East Texas	Nonprofit organizations	Homelessness	Other
City of Denton	Government	Homelessness	Other
Corpus Christi Hope House, Inc.	Regional organization	Homelessness	Other
Matagorda County Women's Center	Nonprofit organizations	Homelessness	Other
City of Amarillo	Government	Homelessness	Other
Alliance of Community Assistance Ministries, Inc.	Nonprofit organizations	Homelessness	Other
SEARCH	Nonprofit organizations	Homelessness	Other
The Bridge Over Troubled Waters, Inc	Nonprofit organizations	Homelessness	Other
Northwest Assistance Ministries	Nonprofit organizations	Homelessness	Other
City of Beaumont	Government	Homelessness	Other
Proyecto Azteca	CHDO	Ownership	Colonias
Texas CDBG	Departments and agencies	Economic Development Non-homeless special needs Planning public facilities public services	State
Texas Department of Housing and Community Affairs	Departments and agencies	Homelessness Ownership Planning Public Housing Rental	State
TX Dept. of State Health Services	Departments and agencies	Non-homeless special needs	State

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
Hidalgo County	Government	Economic Development Non-homeless special needs Ownership Planning public facilities public services	Colonias
El Paso County	Government	Economic Development Non-homeless special needs Ownership Planning public facilities public services	Colonias
Del Rio Housing Authority	PHA	Non-homeless special needs Ownership public services	Colonias
Val Verde County	Government	Economic Development Non-homeless special needs Ownership Planning public facilities public services	Colonias
Maverick County	Government	Economic Development Non-homeless special needs Ownership Planning public facilities public services	Colonias
Webb County	Government	Economic Development Non-homeless special needs Ownership Planning public facilities public services	Colonias

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
Starr County	Nonprofit organizations	Economic Development Non-homeless special needs Ownership Planning public facilities public services	Colonias
Community Development Corporation of Brownsville	Nonprofit organizations	Ownership	Colonias
Cameron County	Government	Economic Development Non-homeless special needs Ownership Planning public facilities public services	Colonias
Willacy County	Government	Economic Development Non-homeless special needs Ownership Planning public facilities public services	Region
Starr County Self-Help Center	Nonprofit organizations	Ownership	Colonias

Table 5 - Institutional Delivery Structure

Assessment of Strengths and Gaps in the Institutional Delivery System

The institutional delivery system of the Grantee involves three State departments: TDHCA, TDA, and DSHS. For the State, one institutional delivery gap is the limited staff resources. TDHCA increased staff to help with the \$1.2 billion additional funding received under the American Recovery and Reinvestment Act ("ARRA") beginning in 2009. With those programs completed and staff size reduced to pre-ARRA levels combined with subsequent reduction in HOME funds and the impacts of sequestration, staff is challenged to take on more roles and functions. Furthermore, as a result of the new HUD HOME Rule, TDHCA has been assigned expanded responsibility for monitoring and oversight with no increase in this already-reduced level of funding. For TDA, limited financial and staff resources in a very large state mean that travel for on-site technical assistance is a challenge.

There is a great amount of need demonstrated in the Needs Assessment, of which only a small portion can be addressed with the resources available. Every year the programs are oversubscribed.

Moving on to the programs' institutional deliveries, HOME provides loans and grants through units of general local government, public housing authorities, CHDOs, nonprofit organizations and other eligible entities. TDHCA sets-aside a portion of the HOME allocation for CHDO operations, offers periodic training specific to CHDO activities, and encourages participation at CHDO training events offered by HUD.

For ESG, this program has traditionally funded subrecipients through a statewide competitive Notice of Funding Availability ("NOFAs"). This system led to gaps in ESG subrecipients' service areas because applicants in certain areas of the State may not have scored high enough to receive an award. ESG is now shifting to greater coordination with the CoCs.

For HOPWA, Project Sponsors have experienced high staff turnovers, partially due to low administrative caps that require salaries to be leveraged from other already-strained funding sources and because salaries are not always competitive in HIV services. Insufficient program funding and limited capacity has prevented HOPWA from expanding outreach activities, especially in rural areas.

For CDBG, funds are awarded through competitive applications, other than the small portion directed to TDHCA to support Colonia SHCs. TDA ensures that communities in each region of the state receive grants, however current funding levels only support approximately one third of all applications. Regional Review Committees determine priorities for awarding most of the funds, which promotes local control but can result in certain types of communities being more or less competitive in the application process based on community size, available employment and poverty information, or other variations in community characteristics.

Assess the strengths and gaps in the institutional delivery system working within the Colonias

Colonia communities are often geographically dispersed within their counties and do not have a formal organizational structure. Local government entities and nonprofit organizations that want to apply for funding on behalf of colonia residents may not have the staff resources or experience to navigate complex federal programs. Colonia communities and border counties also do not have a tradition of using private outside administrators to ensure compliance with federal regulations.

TDHCA's HOME Division allocates funding for contract-for-deed-conversion activities each year specifically designed to assist households in moving from contract-for-deed situations into a traditional mortgage. The funds assure a continued revenue stream for administrators working on these issues, and promote capacity. Other HOME funds are limited to non-PJs by State statute, and most colonias are located in these areas.

There appears to be a less than state average incidence of literal homelessness; however, there is a greater number of overcrowded housing as family members double up in one household. Since Colonia communities often do not have formal organizational structure, no organizations within Colonias have applied for funding through TDHCA's NOFAs for ESG. It is hoped that TDHCA's move to fund CoCs directly will result in more resources for persons in colonias who may be homeless or at risk.

The CDBG Program includes a colonia set-aside to address ongoing infrastructure and housing needs in Colonias. Counties apply for funding on behalf of colonia communities, and many administer the projects using local staff. Recently, several major compliance deficiencies have called into question the

ability of communities to continue this arrangement. CDBG-funded projects may also include, or be related to, funding from other state and federal agencies, which increases the complexity of the projects. TDA works with other agencies to create as smooth a process as possible, but must rely on the County and its administrative staff or consultant to complete the projects.

TDHCA has three Border Field Offices strategically placed along the Texas-Mexico border. These offices disseminate information and extend on-going technical assistance to grass roots organizations and small local governments who serve colonia residents.

Availability of services targeted to homeless persons and persons with HIV and mainstream services

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	X	X	X
Legal Assistance	X	X	X
Mortgage Assistance	X		X
Rental Assistance	X	X	X
Utilities Assistance	X	X	X
Street Outreach Services			
Law Enforcement	X		
Mobile Clinics	X		X
Other Street Outreach Services	X	X	X
Supportive Services			
Alcohol & Drug Abuse	X	X	X
Child Care	X		X
Education	X	X	X
Employment and Employment Training	X	X	X
Healthcare	X	X	X
HIV/AIDS	X	X	X
Life Skills	X	X	X
Mental Health Counseling	X	X	X
Transportation	X	X	X
Other			
Insurance Assistance, Food Pantry	X		X

Table 6 - Homeless Prevention Services Summary

Describe the extent to which services targeted to homeless person and persons with HIV and mainstream services, such as health, mental health and employment services are made available to and used by homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families and unaccompanied youth) and persons with HIV within the jurisdiction

The sheer size of Texas results in large areas of the state where there are significant gaps in the availability of services for persons who are homeless or at risk of homelessness. This is especially true in rural areas where only one organization may serve numerous counties and towns.

Regarding ESG, mainstream services such as health, mental health and employment services are primarily provided to homeless persons who are residing in emergency shelter or who have been housed through rapid re-housing. Of the 23 Subrecipients of 2013 ESG funds, the majority provide case management, transportation, education, employment search, and life skills training. Healthcare, mental health, child care, and legal services were the least offered.

HOPWA's AAs and providers conduct targeted outreach activities to HIV clients. By integrating HOPWA with Ryan White services, clients are linked and retained into medical care. Project Sponsors leverage available funds from Ryan White and state services grants to assist clients with housing needs, medical and non-medical case management, emergency utility assistance, mental health, transportation, and nutritional services to address the needs of eligible clients. Individualized care plans help clients with employment and education opportunities when appropriate.

Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above

For the State agencies, many workgroups, committees, or councils help to address service delivery for special needs populations. These are described in Strategic Plan Section 30.

For the CPD Programs, HOME Single Family focuses resources on the needs of disabled populations, as described in Strategic Plan Section 25. TDHCA's HOME Multifamily Development funds are often paired with competitive housing tax credits. Competitive housing tax credits are awarded to applicants based upon a scoring system, and one way to obtain points is by committing to set-aside at least 5% of units for Persons with Special Needs as defined by TDHCA. Therefore, the majority of HOME Multifamily Development funds are used, albeit indirectly, for developments set-aside units for Persons with Special Needs. Developments awarded HOME Multifamily Development funds alone or in conjunction with noncompetitive housing tax credits typically do not have an incentive to set-aside units for Persons with Special Needs, unless those developments are awarded under the Persons with Disabilities set-aside.

For HOPWA, it is difficult to conduct onsite HOPWA/HIV outreach to the homeless population. Project Sponsors do not have resources to perform targeted outreach to the homeless but they do attempt to make literature available to shelters, hospitals, and clinics. Project Sponsors fill staff vacancies as soon as they can and also attempt to find ways to enhance outreach within resource constraints. They also work to identify other agencies that may have direct contact with out-of-care or homeless individuals. Homeless PLWH are typically out of care for many reasons, including inability to make or keep medical appointments or to obtain or take medicine, fear of discrimination, and so many more issues.

For CDBG, three Border Field Offices along the Texas-Mexico border support colonia-serving grantees with on-going technical assistance as well as to disseminate information directly to colonia residents. The Border Field Offices also facilitate service delivery and problem-solving by meeting with other Texas state agencies and offices, such as the Office of the Secretary of State and the Office of the Attorney General, who have investigators and ombudspersons appointed specifically for colonia issues. C-RAC, which consists of individuals that live in the colonias that are addressed with SHC funds, exists to advise TDHCA/TDA and assess its CDBG-funded activities in the colonias.

Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs

The State works to overcome its limited staff resources by cross training and education. This training includes offerings through other government agencies, such as the State Office of Risk Management and the Comptroller, as well as tuition reimbursement for classes related to duties at work and cross-training. Cross training in particular allows for greater flexibility in staff positions. This helps existing staff become more efficient and effective.

In order to try to address the growing need, the State works to leverage and layer funding sources. Collaboration among State agencies and local communities is paramount, as indicated in Strategic Plan Section 35. While the leveraging and layering cannot stretch the funds to address all the needs, it makes existing funds go further to reach more Texans in need.

Regarding HOME, the program recently introduced a new funding model that dramatically increases commitments of HOME funds, expands the network of administrators, and allows TDHCA to serve a broader geographic area. The new process, known as the Reservation System, allocates TDHCA's HOME funds for single family activities including CHDO, homebuyer, homeowner, and TBRA on a household-by-household basis. Through the Reservation System, TDHCA is using its HOME funds more promptly, serving more households in a more diverse area, and expanding its network of providers.

The HOME Multifamily Development Program awards approximately 80% of its funds to applicants who receive allocations through the competitive (9%) HTC Program as well. Pairing HOME funds with a competitive funding source typically means that those developments are superior to developments that would be funded solely with HOME funds, both in terms of the quality of the units and the location of the development. This partnership with a competitive funding source can be viewed as a distinct strength in the institutional delivery of HOME Multifamily Development Program.

For ESG, TDHCA is running a pilot project in PY 2014 to investigate the feasibility of direct ESG funding to CoC representative agencies. This would ensure that each CoC received funds, and would move all planning for use of funds to the CoC level. The hope is that such a system would promote greater coverage throughout the State.

Regarding HOPWA, Project Sponsors will budget appropriately so that staff can go out in the community to engage in increased outreach activities to ensure that agencies and locations where the target population congregates have access to the HOPWA-related literature and information. These efforts, in conjunction with staff discussing HOPWA services with clients during face-to-face visits, will enroll more clients and serve more PLWH and families in need of stable housing. Staff will increase the number of shelters and other locations to which they provide program materials.

For CDBG, TDA provides training through published policies, workshops, and on-site visits. Workshops and webinars are held prior to each competitive application cycle to ensure that all interested communities, particularly jurisdictions with low- to moderate-income and colonia areas, will have the information to compete for funding. Additional training is provided to ensure that grant recipients are aware of all federal and state requirements. All projects receive an initial site visit, and a risk assessment is used to determine which projects require on-site reviews at project completion.

SP-45 Goals Summary – 91.315(a)(4)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Homeless Goals	2015	2019	Homeless	State of Texas	Rehabilitation of housing Homeless Outreach Emergency shelter and transitional housing Rapid Rehousing Homelessness Prevention	ESG: \$41,195,380	Tenant-based rental assistance / Rapid Rehousing: 22850 Households Assisted Homeless Person Overnight Shelter: 53555 Persons Assisted Homelessness Prevention: 31240 Persons Assisted
2	Construction of single family housing	2015	2019	Affordable Housing Non-Homeless Special Needs	State of Texas	Production of new units	HOME: \$3,362,570	Homeowner Housing Added: 35 Household Housing Unit
3	Rehabilitation of single family housing	2015	2019	Affordable Housing Non-Homeless Special Needs	State of Texas	Rehabilitation of housing	HOME: \$5,611,175	Homeowner Housing Rehabilitated: 330 Household Housing Unit
4	Homebuyer assistance with possible rehabilitation	2015	2019	Affordable Housing Non-Homeless Special Needs	State of Texas	Acquisition of existing units	HOME: \$2,408,057	Direct Financial Assistance to Homebuyers: 200 Households Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5	Tenant-Based Rental Assistance with HOME funding	2015	2019	Affordable Housing Non-Homeless Special Needs	State of Texas	Rental Assistance	HOME: \$28,055,875	Tenant-based rental assistance / Rapid Rehousing: 2550 Households Assisted
6	Households in new/rehabilitated multifamily units	2015	2019	Affordable Housing Non-Homeless Special Needs	State of Texas	Production of new units Rehabilitation of housing	HOME: \$37,742,675	Rental units constructed: 300 Household Housing Unit Rental units rehabilitated: 75 Household Housing Unit
7	HOPWA Tenant-Based Rental Assistance	2015	2019	Affordable Housing Non-Homeless Special Needs	State of Texas	Rental Assistance Homelessness Prevention	HOPWA: \$8,646,610	Tenant-based rental assistance / Rapid Rehousing: 2200 Households Assisted
8	HOPWA Short-Term Rent, Mortgage, & Utilities Asst	2015	2019	Affordable Housing Non-Homeless Special Needs	State of Texas	Homelessness Prevention	HOPWA: \$2,267,963	Homelessness Prevention: 2350 Persons Assisted
9	HOPWA Permanent Housing Placement Assistance	2015	2019	Affordable Housing Non-Homeless Special Needs	State of Texas	Rental Assistance Homelessness Prevention	HOPWA: \$42,524	Public service activities other than Low/Moderate Income Housing Benefit: 65 Persons Assisted
10	HOPWA-Funded Supportive Services	2015	2019	Affordable Housing Non-Homeless Special Needs	State of Texas	Supportive Services for Persons with HIV/AIDS	HOPWA: \$2,267,963	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 4450 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
11	CDBG Other Construction	2015	2019	Non-Housing Community Development	State of Texas	Public facilities Public Improvements and Infrastructure Public services Economic development	CDBG: \$224,430,740	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 1139215 Persons Assisted
12	CDBG Economic Development	2015	2019	Non-Housing Community Development Economic Development	State of Texas	Public facilities Public Improvements and Infrastructure Public services Economic development	CDBG: \$74,368,045	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 66610 Persons Assisted Jobs created/retained: 4000 Jobs
13	CDBG Planning / Capacity Building	2015	2019	Non-Housing Community Development	State of Texas	Public facilities Public Improvements and Infrastructure Public services	CDBG: \$2,802,475 CDBG Colonias Set-aside: \$121,250	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 187695 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
14	CDBG Disaster Relief / Urgent Need	2015	2019	Non-Housing Community Development	State of Texas	Public facilities Public Improvements and Infrastructure Public services	CDBG: \$47,036,165	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 661240 Persons Assisted
15	CDBG Colonia Funds	2015	2019	Affordable Housing Non-Housing Community Development	State of Texas	Production of new units Rehabilitation of housing Acquisition of existing units Public facilities Public Improvements and Infrastructure	CDBG Colonias Set-aside: \$30,719,575	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 16740 Persons Assisted Other: 21000 Other

Table 7 – Goals Summary

Goal Descriptions

1	Goal Name	Homeless Goals
	Goal Description	Goals for 5-year period based on Program Year ("PY") 2012 performance.
2	Goal Name	Construction of single family housing
	Goal Description	The number will be an estimation of households to be assisted through Single-Family HOME funds for new construction based on PY 2014 allocation and a planned shift in resources from multifamily to single-family activities.
3	Goal Name	Rehabilitation of single family housing
	Goal Description	The number will be an estimation of households to be assisted through Single-Family HOME funds for rehabilitation and new construction based on the PY 2014 allocation for general single family and persons with disabilities set-asides, and a planned shift in resources from multifamily to single-family activities.
4	Goal Name	Homebuyer assistance with possible rehabilitation
	Goal Description	The number will be an estimation of households to be assisted through Single-Family HOME funds for homebuyer assistance and homebuyer assistance with rehabilitation or modification based on the PY 2014 allocation for contract-for-deed conversion and persons with disabilities set-asides, and a shift in resources from multifamily to single-family activities.
5	Goal Name	Tenant-Based Rental Assistance with HOME funding
	Goal Description	The number will be an estimation of households to be assisted through Single-Family HOME funds for TBRA based on the PY 2014 allocation for general single family and persons with disabilities set-asides, and a planned shift in resources from multifamily to single family activities.
6	Goal Name	Households in new/rehabilitated multifamily units
	Goal Description	The number will be an estimation of units rehabilitated or newly constructed based on the PY 2014 allocation and a planned shift in resources from multifamily to single-family activities. Multifamily Development Funds are available in the form of low interest rate repayable loans to for-profit and nonprofit developers to construct and/or rehabilitate affordable multifamily rental housing. HOME Multifamily Development Funds typically represent 5% to 20% of the total development costs on projects that are layered with 9% HTC. For non-layered projects, HOME Multifamily Development Funds can represent over 50% of a project's total development cost. If the construction is paired with other sources of TDHCA funding, performance is measured at the time that cost certification is measured. If construction is only HOME funding, then performance is measured at the time of final draw.
7	Goal Name	HOPWA Tenant-Based Rental Assistance
	Goal Description	The TBRA program provides tenant-based rental assistance to eligible individuals until they are able to secure other affordable and stable housing. TBRA helps clients maintain affordable and stable housing, reduces risk of homelessness, and improves access to health care and supportive services.

8	Goal Name	HOPWA Short-Term Rent, Mortgage, & Utilities Asst
	Goal Description	STRMU assistance program: The STRMU program provides emergency short-term rent, mortgage, and utility payments to eligible individuals for a maximum of 21 weeks of assistance in a 52-week period. STRMU helps low-income HIV-positive clients maintain affordable housing, reduce risk of homelessness, and improve access to health care and supportive services.
9	Goal Name	HOPWA Permanent Housing Placement Assistance
	Goal Description	The PHP program provides assistance for housing placement costs which may include application fees, related credit checks, and reasonable security deposits necessary to move persons into permanent housing. PHP helps low-income HIV-positive clients establish affordable and stable housing, reduce risk of homelessness, and improve access to health care and supportive services.
10	Goal Name	HOPWA-Funded Supportive Services
	Goal Description	HOPWA Supportive Services provides financial assistance for HOPWA case management, basic telephone service, and provision of smoke detectors. Supportive Services may be provided in conjunction with HOPWA housing assistance or as a stand-alone service. HOPWA housing assistance and Supportive Services are integrated with the larger Ryan White Program both in administration and service delivery, which in turn is integrated into the larger, multi-sectoral system for delivering treatment and care to these clients. The goals of the HOPWA program are to help low-income HIV-positive clients establish or maintain affordable and stable housing; to reduce the risk of homelessness; and to improve access to health care and supportive services.
11	Goal Name	CDBG Other Construction
	Goal Description	Total number of beneficiaries for CDBG other construction grants, including basic infrastructure. Funding allocated includes annual allocation in addition to previously deobligated funds.
12	Goal Name	CDBG Economic Development
	Goal Description	Number of jobs created/retained and beneficiaries served by the Texas Capital Fund programs. Funding allocated includes annual allocation in addition to previously deobligated funds.
13	Goal Name	CDBG Planning / Capacity Building
	Goal Description	Total number of beneficiaries served by the CDBG Planning/Capacity Building programs (may include public services). Funding allocated includes annual allocation in addition to previously deobligated funds.
14	Goal Name	CDBG Disaster Relief / Urgent Need
	Goal Description	Total number of beneficiaries served by the CDBG Disaster Relief / Urgent Need programs. Funding allocated includes annual allocation in addition to previously deobligated funds.
15	Goal Name	CDBG Colonia Funds
	Goal Description	Total number of beneficiaries served by the CDBG colonia programs. Funding allocated includes annual allocation in addition to previously deobligated funds. The "other" category represents the number of colonia residents receiving direct assistance.

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)

Based on anticipated program activities, TDHCA estimates that the number of PY 2015 beneficiaries for HOME Single Family assisted will be approximately 625 low-, very low-, or extremely low-income households. On the basis of historical performance, TDHCA estimates that approximately 50 percent of those households will be minority households. The HOME Multifamily Program estimates that approximately 30 households with income in the 0-50% AMI category, 30 households in the <80% AMI category, and 15 households with moderate income will be served per year from 2015 to 2019.

The ESG Program estimates that 39,000 households will be assisted through homelessness prevention and rapid re-housing activities per year.

The goals of the HOPWA Program are to help low-income HIV-positive clients establish or maintain affordable and stable housing; to reduce the risk of homelessness; and to improve access to health care and supportive services. DSHS estimates that the Texas HOPWA program will assist 923 unduplicated, income-eligible clients each year with housing subsidy assistance.

The CDBG Program encourages regional priority set-asides for housing projects such as housing rehabilitation, and housing rehabilitation in colonia areas. Based on prior application, the TDA estimates rehabilitating homes for 20 families per year and providing utility connections and similar housing assistance for an additional 250 families per year.

OCI, funded with a set-aside of CDBG funds, estimates that 4,200 persons living in colonias will be assisted by the Colonia SHCs' affordable housing activities yearly.

SP-50 Public Housing Accessibility and Involvement – 91.315(c)

Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)

TDHCA is a PHA that receives tenant-based Section 8, but not project-based Section 8. It does not administer public housing funds for the purpose of operating public housing developments, and serves only a small portion of Texas. Also, TDHCA is not under a Voluntary Compliance Agreement for additional 504 units.

To address Public PHA needs, TDHCA allows PHAs to be subrecipients for many of its programs, such as HTC Program, HOME Program and ESG Program. PHAs have successfully administered HTC awards to rehabilitate or develop affordable rental housing and TDHCA addresses the matter of public housing accessibility and involvement through these programs. The Department has recently adopted new 10 Texas Administrative Code (“TAC”) §1.201-1.212 concerning Accessibility Requirements which provides guidance regarding the requirements of §504 of the 1973 Rehabilitation Act and the Fair Housing Act and applicability to all recipients of awards from TDHCA. TDHCA has adopted the 2010 ADA standards for accessible design, with the exceptions listed in “Nondiscrimination on the Basis of Disability in Federally Assisted Programs and Activities” Federal Register 79 FR 29671. In addition, all rental developments assisted by TDHCA must conform to these standards, which require that at least 5% of the TDHCA’s units be accessible for persons with physical disabilities and at least 2% of the units be accessible for person with hearing and visual impairments.

Activities to Increase Resident Involvements

HOME Addresses Public Housing Residents Involvement

TDHCA sends notification of published notices of funding availability under the HOME Program to interested parties around the state, including PHAs. Furthermore, staff of PHAs, especially those receiving HOME funds and those with Section 8 Homeownership programs, are targeted by TDHCAs Texas Statewide Homebuyer Education Program for training to provide homebuyer education opportunities and self-sufficiency tools for PHA residents.

In addition, PHAs also administer HOME tenant-based rental assistance funds, enabling them to provide households with rental assistance and services to increase self-sufficiency.

ESG Addresses Public Housing Residents Involvement

PHA residents are eligible to receive assistance and services from ESG subrecipients, as long as the assistance does not violate Section 576.105(d) of the ESG rules (24 CFR §576.105(d)) regarding use of funds with other subsidies.

HOPWA Addresses Public Housing Residents Involvement

The HOPWA Program administered by DSHS does not provide public housing assistance. However, Project Sponsors coordinate closely with local housing authorities for client referrals and to address local housing issues. HOPWA clients who move into public housing are no longer eligible to receive HOPWA

housing subsidy assistance but are offered HOPWA Supportive Services as needed for transition and, if eligible, may continue to receive services through the Ryan White/State Services program.

CDBG Addresses Public Housing Residents Involvement

PHA residents are eligible beneficiaries for CDBG-funded projects through an eligible unit of local government.

Is the public housing agency designated as troubled under 24 CFR part 902?

No

Plan to remove the ‘troubled’ designation

There are no known troubled PHAs in Texas. TDHCA has worked to promote programs that will repair substandard housing and develop additional affordable housing units: TDHCA has designated PHAs as eligible entities for its programs, such as the HTC Program, HOME Program, and ESG Program. PHAs have successfully administered HTC awards to rehabilitate or develop affordable rental housing, as well as rental assistance programs.

Through HUDs new Rental Assistance Demonstration (“RAD”) Program, PHAs can use public housing operating subsidies along with the HTC Program once the older PHA units are demolished and replaced with new housing. Most of the PHAs currently taking advantage of this program are located in urban areas of the state that receive their own allocations of HOME funds; therefore, TDHCA does not anticipate using its HOME funds in conjunction with RAD.

Finally, TDHCA has developed a relationship with the Texas Housing Association and the Texas chapter of the National Association of Housing and Redevelopment Officials, which represent the PHAs of Texas.

SP-55 Barriers to affordable housing – 91.315(h)

Barriers to Affordable Housing

Regulatory barriers cited by the 2013 Analysis of Impediments to Fair Housing Choice ("AI") included zoning and land use ordinances and a lack of universal design concepts in planning goals. It also identified local best practices that mitigate barriers and promote choice. Best practices highlighted land use and zoning regulations, such as definitions of "family" that include unrelated persons living together in residential settings; providing for at least one zone for small lot single family dwellings; and making reasonable residential lot size requirements (e.g., districts/overlays that allow multifamily homes by right and enough land for multifamily units). Other items included allowing manufactured homes in at least one residential district; avoiding minimum dwelling sizes; avoiding permitting or public disclosure for group homes; incentivizing diverse housing stock through density, reduced parking requirements, fee waivers/reductions, and allowance for accessory dwelling units; and public land donations or set-asides for low-income and special needs populations.

During the consultation process of the 2015-2019 State of Texas Consolidated Plan, many of the impediments identified within the AI were echoed by the Inclusive Communities Project. The Inclusive Communities Project commented that state statute prohibits the use of inclusionary zoning, which allows a municipality to require a share of new construction to be affordable to persons with low to moderate incomes. TDHCA is unaware of any statute which expressly prohibits inclusionary zoning.

The AI recommended that local governments review and adopt best practices for furthering fair housing choice, and that the State assist in promoting best practices through communication with Councils of Government ("COGs") and trade organizations. The AI mentioned Not in My Backyard ("NIMBYism") and a lack of affordable housing knowledge as issues.

The AI focused on action items the State could adopt to improve housing opportunities and mobility for low-income households and protected classes. There are 22 Action Steps that relate to six impediments and four observations.

TDHCA began work on the action steps by creating a Fair Housing Team, with a Fair Housing Team Lead. Two additional staff may be hired in the future. The Fair Housing Team is reviewing each program to determine what is currently done to further action steps, gather information on challenges, and compile demographic data. Fair Housing staff will review guiding documents and agency-wide policy and plans, assist with data analysis, pinpoint gaps in service provision, and make recommendations about populations least likely to be served by housing programs. Data gathering will result in a quarterly reporting tool identifying agency-wide and program area actions, and a mapping and demographic database to provide service area data for a public website interface. The Fair Housing Team meets at least quarterly with other state agencies to share best practices and coordinate Fair Housing activities.

Finally, a policy that affects the return on investment of affordable housing funds involves the pressure from local governments, nonprofits and other subrecipients to use grants instead of loans. For example, between 2008 and 2010, the HOME Program adjusted its policies to use loans instead of grants in an effort to recycle loan repayment into HOME for additional subrecipients. However, many subrecipients stopped administering HOME in protest, resulting in some activities returning to grants and the loss of the repayment of funds. However, because of the cuts to HOME funding from HUD, the affordable

housing community may now be more receptive to the transition back to loans because of potential program income.

The State's efforts to mitigate these barriers will be seen in Strategic Plan Section 55 and Action Plan Section 75.

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

Local governments and officials more often have a greater awareness of their local economic, demographic and housing conditions, and the State of Texas gives local governments authority over their own lands. Please note that, as a state entity, state agencies cannot lobby or attempt to influence the support or defeat of a legislative measure. However, TDHCA and TDA can and do provide information to localities related to affordable housing compliance.

The State of Texas does not have authority to exercise zoning, impose impact fees, development fees or deed restrictions, or regulate building codes and so cannot directly affect these barriers. Nonetheless, TDHCA is taking steps to increase its role as an information resource to assist localities in overcoming unnecessary regulatory barriers which may increase the cost of housing. TDHCA accomplishes this as follows:

- Creating consistent resource information across state agencies that will assist users in finding policy guidance, seeking assistance, and finding trainings;
- Continuing education programs, such as the Texas Statewide Homebuyer Education Program which provides lenders, homebuyer educators and consumers information on serving traditionally underserved populations;
- Creating data transparency tools that will provide program, service and underserved population information that can be used by elected officials, local governments, developers, contract administrators, and the general public when creating policy positions and recommendations; and,
- Continuing research on defining and addressing any identified State and local policy barriers and countering such barriers through the release of best practices guidance or pursuing modifications of such policies where rules are promulgated by TDHCA and modification is possible under State statute.

In 2013, the Sunset Advisory Commission recommended changes to the State's Qualified Allocation Plan ("QAP"), the rules that govern the HTC Program, to replace neighborhood organization letters with local voted resolutions as scoring items in the competitive 9% HTC program. As originally recommended by the Sunset Advisory Commission, the AI also discussed eliminating the requirement for letters of support from state senators and representatives as scoring items. On September 1, 2013, the TDHCA Sunset Bill (House Bill 3361) adopted by the 83rd Texas Legislature became effective; the law provides for local resolutions as the second highest scoring item for 9% HTC applications, placing neighborhood organization letters in tenth place, letters from state representatives in eleventh place, and eliminating support from state senators as a factor.

Finally, in 2013 the HTC Program created an Opportunity Index and educational excellence scoring items, which provide incentives to tax credit applicants to develop in areas with greater opportunities for low-income households, including high-quality public education. An alternative incentive for

development in areas with community revitalization efforts was also created. Inclusive Communities Project in its consultations points to community assets as social capital. Community revitalization provides the infrastructure necessary to encourage investment and assets that allow social capital to be used effectively. These incentives also work to balance the need for locating housing near public transit, while also ensuring housing options in higher income areas where public transit can be less prevalent. These policies align with the observations made by South Central Texas 211's consultation that preferential treatment is given to developments near public transportation, but public transportation also tends to be near high concentrations of poverty and low economic opportunity.

More on HOME's grant and loan policies can be found in Action Plan Section 75.

SP-60 Homelessness Strategy – 91.315(d)

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

TDHCA plans to provide ESG funding directly to CoCs so that CoC leaders can determine the best use of the funds. This next step aligns state homeless programs more directly with that of the CoCs. Direct funding will allow a CoC to direct its outreach efforts to the most vulnerable persons that they identify in their services areas. CoCs will be required to propose a plan for serving persons who are homeless. Part of this plan is an inventory of services available within the CoC. With this information, CoCs will be able to coordinate outreach activities within the CoC and direct persons who are homeless to required services. CoCs will also be required to have a coordinated assessment, which will assess individual needs and identify service and housing options available through the ESG program or through other CoC resources.

Addressing the emergency and transitional housing needs of homeless persons

ESG provides funds for emergency shelter, allowing U.S. Department of Housing and Urban Development's ("HUD") CoC Program recipients to apply more of their federal dollars to support transitional housing activities. Based on prior ESG funding history, of the organizations funded, approximately 66-68% of the persons assisted have been provided with emergency shelter. Emergency shelter is coupled with essential services to address the more urgent needs of those in emergency shelter, and case management to address barriers to obtaining permanent housing. ESG will continue working through CoCs to fund emergency shelter as a way to help persons who are homeless transition from homelessness to transitional housing (where needed), and then to permanent housing.

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

In line with HUD's mission to shelter homeless persons as a first step to ending homelessness, Texas has shifted its focus from primarily providing street outreach and shelter support to finding ways to help persons who are homeless in becoming permanently housed. Emergency shelter is combined with case management and essential services to better equip individuals and families to remain in permanent housing. In instances where an individual or family is not at the point of entering permanent housing, transitional shelter may be provided. To encourage permanent housing activities, the Texas ESG has traditionally provided higher points in its competition for ESG funds for rapid rehousing activities. The ESG funds housing relocation efforts to reach out to landlords and negotiate rental contracts for clients. Combined with stabilization efforts, rapid rehousing provides permanent housing along with financial and service supports that assist clients in remaining in permanent housing. The CoC plan will require that CoCs have in place written standards for determining and prioritizing individuals and families for rapid rehousing and homelessness prevention.

Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs

Based on prior ESG funding history, homelessness prevention ranks second in the use of ESG funds in Texas. TDHCA anticipates that ESG funded organizations will continue to utilize approximately 25% of the ESG grant on homelessness prevention activities. These activities include financial assistance, and activities meant to help a household maintain its permanent housing after discharge from the program. Case management is focused on improving a family's ability to remain in permanent housing, including acquiring any Federal, State, or other benefits that may be available. To encourage permanent housing activities, the Texas ESG has traditionally provided higher points in its competition for ESG funds for these activities. The CoC plan will require that CoCs have in place written standards for determining and prioritizing individuals and families for rapid rehousing and homelessness prevention.

The Texas HOPWA program helps low-income HIV-positive clients establish or maintain affordable and stable housing; helps reduce the risk of homelessness; and improves access to health care and supportive services through housing subsidy assistance (TBRA, STMRU, and PHP) and case management (Supportive Services). Upon intake, HOPWA clients are screened for Ryan White care needs, and conversely, Ryan White clients are screened for housing needs. Case Managers work with clients on an individualized care plan designed to keep them housed and linked to medical care. DSHS utilizes Ryan White-funded Minority AIDS Initiative ("MAI") funds to link incarcerated HIV-infected individuals to medical care and support services and enrollment for the HIV medications program prior to release.

TDHCA received an award for \$12 million for the Section 811 Demonstration Program and anticipates implementing the program during the Consolidated Plan period. The program will help extremely low-income individuals with disabilities and their families by providing approximately 360 new integrated supportive housing units in seven areas of the state. Members of the target population include individuals transitioning out of institutions including nursing facilities, people with severe mental illness and youth with disabilities transitioning out of the state's foster care system. The Section 811 Target Population receives assistance from public agencies, are Medicaid-eligible, and could be at-risk of housing instability and/or homelessness.

SP-65 Lead based paint Hazards – 91.315(i)

Actions to address lead-based paint hazards and increase access to housing without lead-based paint hazards

The 1992 Community and Housing Development Act included Title X and calls for a three pronged approach to target conditions that pose a hazard to households: (1) notification of occupants about the existence of hazards so they can take proper precautions, (2) identification of lead-based paint hazards before a child can be poisoned and, (3) control of these lead-based paint hazards in order to limit exposure to residents. (Texas Department of State Health Services, 2007).

While TDHCA monitors its properties for compliance with lead-based paint regulations, DSHS oversees the Texas Environmental Lead Reduction Rules (“TELRR”) for the state as a whole. These rules cover areas of lead-based paint activities in target housing (housing constructed prior to 1978) and child-occupied facilities, including the training and certification of persons conducting lead inspections, risk assessments, abatements, and project design. For all projects receiving over \$25,000 in federal assistance, contractors need to follow inspections and abatements standards overseen by DSHS. By following these standards, the state is increasing the access to housing without lead-based paint hazards.

HOME Addresses Lead-Based Paint

The HOME Program requires lead screening in housing built before 1978 for all HOME eligible activities and in accordance with 24 CFR §92.355, subparts A, B, J, K, M, and R; and 24 CFR Part 35.

ESG Addresses Lead-based Paint

For ESG, TDHCA requires subrecipients to evaluate and reduce lead-based paint hazards for conversion, renovation, or rehabilitation projects funded with ESG funds, and tracks work in these efforts as required by Chapter 58 of the Environmental Protection Act. During the annual contract implementation training, TDHCA provides ESG subrecipients with requirements and information related to lead-based paint regulations. TDHCA requires ESG funded subrecipients to determine if a housing unit was built prior to 1978, for households seeking ESG funded rent or rent deposit assistance whose household has a family member(s) 6 years of age or younger. If the housing unit is built prior to 1978, the ESG subrecipient will notify the household of the hazards of lead-based paint.

HOPWA Addresses Lead-Based Paint

HUD requires that Project Sponsors give all HOPWA clients utilizing homes built before 1978 the pamphlet entitled, “Protect Your Family from Lead in Your Home” during the intake process. The client's case record must include documentation that a copy of the pamphlet was given to the client and the case manager must make a certification regarding lead-based paint that includes actions and remedies if a child under age six will reside at the property.

CDBG Addresses Lead-Based Paint

Lead-based paint mitigation is an activity eligible under housing rehabilitation that is funded under the Colonia Planning and Construction Fund and Community Development Funds. Each contract awarded requires the subgrantee to conform to Section 302 of the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. 4831(b)) and procedures established by the CDBG in response to the Act.

How are the actions listed above integrated into housing policies and procedures?

HOME Addresses Lead-based Paint Procedures

The HOME Program evaluates the potential for the presence of lead-based paint for HOME assisted activities, and takes appropriate steps in accordance with 24 CFR §92.355 and 24 CFR Part 35 including notification of potential lead-based paint hazards to households residing in housing units that pre-date 1978. Furthermore, single-family and multifamily development and reconstruction activities in HOME increase the access to lead-based-paint-free housing because they create new housing.

ESG Addresses Lead-Based Paint Procedures

ESG subrecipients utilizing ESG funds for renovation, rehabilitation or conversion must comply with the Lead Based Paint Poisoning and Prevention Act and the Residential Lead-Based Paint Hazard Reduction Act of 1992. Through renovation, rehabilitation or conversion, ESG increases access to shelter without lead-based paint hazards. More ESG actions for lead-based paint are located in the One Year Action Plan.

HOPWA Addresses Lead-Based Paint Procedures

The DSHS HOPWA Program Manual is clear that HUD requires Project Sponsors to give all HOPWA clients the lead-based paint pamphlet entitled Protect Your Family from Lead in Your Home. The checklist DSHS provides requires that the client's case file must include documentation that a copy of the pamphlet was given to the client. Links to the pamphlet in English and Spanish are listed in the DSHS HOPWA Program Manual.

CDBG Addresses Lead-Based Paint Procedures

In accordance with CDBG state regulations and the Lead-Based Paint Poisoning Prevention Act, CDBG has adopted a policy to eliminate as far as practicable the hazards of lead poisoning due to the presence of lead-based paint in any existing housing assisted under CDBG. Abatement procedures should be included in the housing rehabilitation contract guidelines for each project and must appear in the approved work write-up documentation for all homes built prior to 1978 that will be rehabilitated. The Office of Colonia Initiatives recognizes that TDHCA is working to adopt the Texas Minimum Construction Standards effective January 1, 2015. This standard requires all homes built prior to 1978 that will be rehabilitated with Department assistance to comply with the Environmental Protection Agency's "Renovation, Repair, and Painting" Final Rule found at 40 CFR 745.

SP-70 Anti-Poverty Strategy – 91.315(j)

Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families

The State has an important role in addressing Texas poverty. Poverty has a variety of causes. As America's Poor and the Great Recession states: "spells of poverty begin because of changes in household composition (in particular, divorce or the birth of a child), job loss or not working at all, or disability". The book includes structural causes of poverty, such as recessions that causes lost jobs or decline in manufacturing jobs (Seefeldt & Graham, p 33). The State has several ways to work to lift individuals and households out of poverty.

Through its Community Services Block Grant Program, TDHCA provides administrative support funds to Community Action Agencies and other human service delivery organizations that offer emergency and poverty-related programs to lower-income persons. Activities for the Community Services Block Grant Program can include education services, such as providing funds for tuition or scholarships for higher education. Education can help prevent children from continuing the cycle of poverty when they are adults, and re-education can help adults gain a job in a different career track.

Rental assistance programs, such as the ESG Program, HHSP Program, Section 8 HCV, and HOME's TBRA, can provide case management, which may include a recommendation for the individual to start or continue an appropriate educational program. In the process of creating reduced-rent housing through the HTC or HOME programs, developments located near community amenities or in high opportunity areas score additional points in the application process. These amenities or high opportunity areas may help tenants break the cycle of poverty.

The HOPWA Program works to stabilize income and PLWH. Project Sponsors address long term goals with clients and help them establish a financial plan so they can maintain their housing. A "Single Point of Access" model for wrap-around care continues to show excellent results in assisting clients in medical care and medication adherence and psychosocial and educational support services in a central location, as well as referrals to resources to assist the client with employment, training programs, and applications for programs such as Temporary Assistance for Needy Families.

By affirmatively furthering fair housing, TDHCA programs require that families with children are provided equitable access to housing regardless of household size.

For those income-eligible Texans who have housing, subsidizing or reducing the energy costs may help keep that housing affordable and prevent homelessness. The Comprehensive Energy Assistance Program provides payment of utilities based on income eligibility and priority group status. If the applicant is eligible, the Comprehensive Energy Assistance Program subrecipient makes the energy payment to an energy company through a vendor agreement with energy providers. This program works in conjunction with TDHCA's Weatherization Assistance Program, which provides funds to subrecipients to help low-income households control energy costs through the installation of weatherization (e.g., energy-efficient) measures and energy conservation education.

TDHCA's Housing Trust Fund offers the Amy Young Barrier Removal Program, which helps persons with disabilities and low-incomes make their homes accessible through one-time grants of up to \$20,000 for reasonable accommodations. The Amy Young Barrier Removal Program is available for both renters and

owners, and can help low-income persons with disabilities maintain their housing without requiring relocation for purposes of accessibility.

Finally, the Texas CDBG Program awards funds for community and economic development projects, including infrastructure, housing, and new jobs, benefiting a projected 388,000 persons, who are primarily low- to moderate-income persons.

How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan

More detail on how the CPD Programs governed by this Plan add to the State's anti-poverty strategy is below.

HOME Anti-Poverty Strategy

Through the HOME TBRA Program, TDHCA assists households with rental subsidy and security and utility deposit assistance for an initial period not to exceed 24 months. As a condition to receiving rental assistance, households must participate in a self-sufficiency program, which can include job training, General Education Development ("GED") classes, or drug dependency classes. The HOME Program enables households to receive rental assistance while participating in programs that will enable them to improve employment options and increase their economic independence and self-sufficiency. Additionally, TDHCA allocates funding toward the rehabilitation and construction of affordable rental housing, subsidizing units to benefit very low-income households, and may assist very low-income households along the border by promoting the conversion of contract for deed arrangements to traditional mortgages.

ESG Anti-Poverty Strategy

ESG funds activities that provide shelter and essential services for homeless persons, as well as intervention services for persons threatened with homelessness. Essential services for homeless persons include medical and psychological counseling, employment counseling, substance abuse treatment, transportation, and other services.

ESG's case management and housing stabilization activities help clients to address the situations that contribute to their homelessness or risk of homelessness. Success in these activities make it more likely that a household will gain education or training that will lead to a job or otherwise increased income, or will receive more cash or non-cash benefits, all of which would help to reduce the number of poverty-level families.

For individuals threatened with homelessness, homelessness prevention funds can be used for short-term subsidies to defray rent and utility arrearages for households receiving late notices, security deposits, and payments to prevent foreclosure. And as mentioned, case management and housing stabilization activities may lead to better jobs, higher income, and more Federal, State, or local benefits per household.

CDBG Anti-Poverty Strategy

A substantial majority of CDBG funds, over 95% in 2013, are awarded to “principally benefit low- and moderate-income persons.” In addition, the formula used to distribute Community Development funds among regions includes a variable for poverty which targets funding to the greatest need. CDBG economic development funds create and retain jobs through assistance to businesses. LMI persons access these jobs, which may include training, fringe benefits, opportunities for promotion, and services such as child care.

HOPWA Anti-Poverty Strategy

The Texas HOPWA Program serves PWLH based on income eligibility criteria of no more than 80% of the AMI with adjustments for family and household size, as determined by HUD income limits. With varying poverty levels and housing needs in each HSDA across the state, some Project Sponsors may set stricter local income limits to maximize and target HOPWA resources to those with very low-income or poverty-level income. While many of the HOPWA clients assisted may be at poverty-level, this is not a requirement under 24 CFR §574.3.

SP-75 Colonias Strategy – 91.315

Describe the State's homeless strategy within Colonias.

Homelessness in the colonias manifests itself differently than in other rural areas in Texas. Colonias are typically located outside of areas where shelter and other services that address homelessness are operated. According to staff of the OCI, while there is little evidence of “literal homelessness” in colonias, the homeless in the colonias are more likely to “double-up” and live with other families in a single household. This contributes to the phenomenon of over-crowding. Homeless families and individuals in the colonias may install makeshift dwellings on the same single-family lot as another household (or households), and tap into utility lines with the original family’s permission (Mauleon & Ting, 2000). Although this practice is unsafe, it is affordable and widely practiced in the colonias.

Working with the Texas Balance of State CoC (which includes areas of the state where colonias are common), and through OCI staff (who have direct contact with the Colonia SHCs and the residents), the ESG Program plans to publicize the availability of homelessness services. When SHCs identify families that are “doubled-up” or otherwise possibly at risk of homelessness, those persons will be provided information about available services in the areas closest to the colonia.

Describe the barriers to affordable housing in Colonias.

Barriers include high unemployment, low wages, and lack of creditworthiness that hinders qualification for low-cost, traditional lending products. Some colonias lack proper infrastructure which must be in place in order to receive certain government housing assistance, including that of TDHCA. Colonia families that double-up and live with multiple households on a property meant for a single family are in violation of the Colonia Model Subdivision Rules and encounter obstacles to qualifying for assistance from TDHCA. The lack of clear title, due to an accepted informality in land transactions and the practice of unrecorded contracts for deed (a rent-to-own agreement between a seller and a buyer that puts the buyer in a long-term vulnerable position in which they build no equity and could easily lose the property at default) also preclude colonia families from qualifying for housing assistance (Texas Secretary of State, n.d.). Last, local government offices and housing nonprofits that address colonia housing issues may lack the capacity to apply for and manage competitive funding opportunities.

Describe the State’s strategy for addressing barriers to affordable housing (including substandard housing) in Colonias.

The State dedicates 12.5 percent of CDBG funds annually for colonia areas, and additional funds are also awarded for colonia projects through other competitive fund categories. Basic human needs, including water and sewer infrastructure and housing rehabilitation, are prioritized for colonia set-aside funding, with a particular emphasis on connecting colonia households to safe and sanitary public utilities. Colonia planning funds are available to research and document characteristics and needs for colonia communities.

TDHCA continues to have success with the self-help model for building affordable housing, in which colonia residents construct their own and others’ housing under the guidance of qualified nonprofit housing developers who provide training in construction methods and homeownership. This model lowers the cost of the housing for homeowners who live far below the poverty line, and also lowers

their foreclosure rate when compared to traditional homebuyers. Also, through the creation of three strategically placed Border Field Offices along the Texas-Mexico border, where the vast majority of Colonias are situated, TDHCA has local officers that can readily support administrators, disseminate funding information, and problem solve with both administrators and Colonia residents. Lastly, the Colonia SHCs provides 28 targeted colonias in seven border counties with housing opportunities, community development activities, infrastructure improvements, and financial literacy and technology training.

Describe the State's goals/programs/policies for reducing the number of poverty level families in Colonias.

Colonia set-aside funding is intended to improve the living conditions of low and moderate income families in colonias, including basic human needs. As with all CPD funds, Section 3 goals encourage job, contracting, and training opportunities for qualifying residents when such opportunities become available as a result of grant funding.

The Colonia SHCs provides 28 targeted colonias in seven border counties with a multitude of opportunities to create a one-stop-shop for low-income colonia families to gain a foothold out of poverty. The SHCs provide housing services in the form of new construction, reconstruction, rehabilitation, small repairs, tool lending, construction skills training and utility connections. SHC community development activities include homeownership education, access to and training in computers/technology, consumer rights education and financial literacy, and solid waste disposal assistance. While the above listed services are limited only to residents of pre-identified colonias in the SHC Program, the centers themselves are open to all who wish to use the meeting space for activities beneficial to the community or simply to seek information on locating other services. By creating an accessible and consistent manner for which services and information are disseminated among colonias, more households can become beneficiaries of multiple kinds of assistance that build their self-sufficiency over time.

Describe how the State's goals/programs/policies for producing and preserving affordable housing in the Colonias will be coordinated with other programs and services.

The Texas Secretary of State, the lead state agency monitoring colonia improvements, coordinates an interagency work group that discusses colonia housing development, infrastructure development, and related issues on a quarterly basis. Besides TDHCA and TDA, the Texas Commission on Environmental Quality ("TCEQ"), the Texas Water Development Board ("TWDB"), the Texas Attorney General's Office, the U.S. Department of Agriculture ("USDA"), and other agencies are regularly represented in the work group. The information sharing within the group facilitates delivery for multiple programs besides affordable housing, and proactively addresses potential obstacles that could affect large areas of the Texas-Mexico border.

SP-80 Monitoring – 91.330

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

HOME and ESG Monitoring

The Compliance Division of TDHCA has three sections that are involved in monitoring HOME and/or ESG: Contract Monitoring, Compliance Monitoring, and Physical Inspections. The Contract Monitoring section monitors HOME TBRA, Homeowner Rehabilitation Assistance, Homebuyer Assistance, and all activities under ESG. This section also ensures compliance with Davis Bacon, Uniform Relocation Act, and other requirements during the construction of HOME rental developments. The Compliance Monitoring section ensures compliance with HOME income/rent restrictions, as well as affirmative marketing, tenant selection criteria, and other mandates, as applicable. The Physical Inspections section ensures compliance with property condition standards and accessibility for HOME and ESG. Owners and administrators are notified about 30 days prior to monitoring. Monitors use standardized checklists to ensure compliance with program requirements. Noncompliance is communicated in written format.

HOME rental developments' Loan Commitments include areas for Section 3 Compliance and Minority/Women's Enterprise requirements. The General Contractor must provide a narrative of efforts to meet these requirements prior to releasing the final draw and/or retainage.

HOME TBRA, Homeowner Rehabilitation Assistance, Homebuyer Assistance, and ESG are monitored based on risk factors that include the amount of funds spent, complaints, prior monitoring results, and single audit findings. Based on risk, the review may be conducted onsite or through a desk review.

If HOME properties fall into egregious or ongoing non-compliance or have financial/operational issues that require intervention, TDHCA's Asset Management Division works with the owner to determine the most effective workout/resolution strategy. The two primary goals for HOME-assisted developments is to restore compliance with the Land Use Restrictive Agreement ("LURA") and facilitate repayment of the loan under the originally agreed upon terms.

HOPWA Monitoring

DSHS' HIV Care Services Group, under the HIV/STD Prevention and Care Branch, monitors the AA HOPWA activities, which involves periodic site and technical assistance visits by the consultants, and monthly billing reports and semi-annual progress reports submitted by the Project Sponsors and AAs. AAs monitor the Project Sponsors' to ensure compliance with applicable HUD regulations, the DSHS Program Manual, and the contractual Statement of Work ("SOW"). DSHS Contract Oversight and Support Section conducts fiscal audits. The DSHS Contract Management Unit serves as liaisons between DSHS and the AA, and maintains monitoring records. Principles for fiscal administration are established by the Texas Uniform Grants Management Standards (www.governor.state.tx.us/files/state-grants/UGMS062004.doc). DSHS monitoring requirements are located at <http://www.dshs.state.tx.us/hivstd/pops/default.shtm>.

CDBG Monitoring

TDA ensures compliance through monitoring of CDBG. Each community is reviewed for compliance with previous awards prior to the award of new funds. Contracts include federal and state requirements which are monitored through an objective risk assessment to determine the appropriate level of monitoring. The areas reviewed include procurement, accounting records, environmental records, construction contracts, client files for rehabilitation services, labor standards, and fair housing and civil rights policies. TDA reviews all required Grant Recipient single audits. The Compliance unit and the Project Management unit communicate throughout the contract implementation phase of contracts to identify and possibly resolve issues prior to the monitoring phase.

The Colonia SHC activities are facilitated through a Memorandum of Understanding between TDHCA and TDA, with the TDHCA providing the majority of oversight.

Expected Resources

AP-15 Expected Resources – 91.320(c)(1,2)

Introduction

The U.S. Department of Housing and Urban Development’s (“HUD’s”) Division of Community Planning and Development (“CPD”) administers the HOME Investments Partnerships (“HOME”) Program, the Community Development Block Grant (“CDBG”) Program, the Emergency Solutions Grant (“ESG”) Program, and the Housing Opportunity for Persons with AIDS (“HOPWA”) Program. On behalf of the State of Texas (the “State”) the Texas Department of Housing and Community Affairs (“TDHCA”) administers HOME and ESG, the Texas Department of Agriculture (“TDA”) is the primary administrator of CDBG, and the Department of State Health Services (“DSHS”) administers HOPWA. CPD funding is governed by this Consolidated Plan, but the State also works to collaborate, coordinate, and layer non-CPD funding sources in order to reach more Texans and more efficiently use available funds. Programs listed in the anticipated resources narrative sections below could be used to leverage CPD funds. These include:

- 4% Housing Tax Credit (“HTC”) Program;
- 9% HTC Program;
- Homeless and Housing Services Program (“HHSP”);
- Housing Trust Fund Program;
- Mortgage Credit Certificate (“MCC”) Program;
- First time homebuyer loan programs, including the My First Texas Home Program;
- Neighborhood Stabilization Program - Program Income (“NSP PI”);
- Section 8 Housing Choice Voucher (“HCV”) Program;
- Section 811 Project Rental Assistance (“PRA”) Program; and
- Tax Credit Assistance Program (“TCAP”) Loan Repayments.

For the programs above, the expected future funding amounts, to the extent known, are in the planning documents governing those programs. These documents can be found online at <http://www.tdhca.state.tx.us/>. The anticipated resources below are focused on CPD Programs.

TDHCA participates in numerous committees, workgroups, and councils which help TDHCA stay apprised of other potential resources to address

affordable housing needs. Relationships with other federal and state agencies and local governments are extremely valuable, helping Texas agencies to coordinate housing and services and serve all Texans efficiently and effectively. TDHCA's involvement in these committees promotes identifying opportunities to proactively pursue federal funding opportunities. TDHCA actively seeks engagement and input from community advocates, funding recipients, potential applicants for funding, and others to obtain input regarding the development of effective policies, programs and rules. Changes to funding plans are made periodically based on feedback received through these avenues.

TDHCA is the lead agency for the following workgroups:

Colonia Resident Advisory Committee ("C-RAC"): C-RAC is a committee of colonia residents appointed by the TDHCA Governing Board. It advises TDHCA regarding the needs of colonia residents and the types of programs and activities which should be undertaken by the Colonia Self Help Centers ("SHCs"). The Colonia SHCs funds are provided to seven specific pre-determined counties which, in turn, procure organizations to operate their SHCs.

Disability Advisory Workgroup ("DAW"): The DAW augments TDHCA's formal public comment process, affording staff the opportunity to interact more informally and in greater detail with various stakeholders and to get feedback on designing more successful programs, with a specific focus on gaining insight on issues impacting persons with disabilities.

Housing and Health Services Coordination Council ("HHSCC"): HHSCC is established by Texas Government Code §2306.1091. Its duties include promoting coordination of efforts to offer Service-Enriched Housing and focusing on other cross-agency efforts.

Texas Interagency Council for the Homeless ("TICH"): The TICH was statutorily created in 1989 to coordinate the State's homeless resources and services. The TICH consists of representatives from eleven state agencies. TDHCA, as the primary source for state homelessness funding, provides administrative and planning support to the TICH.

Weatherization Assistance Program Planning Advisory Committee ("WAP PAC"): The WAP PAC is comprised of a broad representation of organizations and agencies and provides balance and background related to the weatherization and energy conservation programs at TDHCA.

The descriptions of the collaborations for DSHS and TDA are in the Discussion question of this section below.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of Con Plan: \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition						TDA's CDBG Program funds community and economic development, excluding the colonia set-aside. Communities may also coordinate CDBG funding with U.S. Department of Agriculture's ("USDA") Rural Development funds or Texas Water Development Board's ("TWDB") State Revolving Fund.
		Admin and Planning						
		Economic Development						
		Housing						
		Public Improvements						
		Public Services	\$53,812,500	\$2,500,000	\$13,000,000	\$69,312,500	\$215,250,000	

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of Con Plan: \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG Colonias Set-aside	public - federal	Acquisition Admin and Planning Homebuyer assistance Homeowner rehab Public Improvements Public Services	\$6,119,665	\$0	\$0	\$6,119,665	\$30,598,325	<p>The Colonia Set-Aside is used both by TDA and TDHCA for goals described in the Strategic Plan Section 45. The Colonia Economically Distressed Areas Program ("CEDAP") Legislative Set - Aside leverages funding from the TWDB's Economically Distressed Areas Program. TDHCA's Office of Colonia Initiatives ("OCI") administers a portion of the CDBG Colonia Set-Aside through its Colonia SHCs. Also, the Housing Trust Fund, which is funded through Texas General Revenue, administers the Texas Bootstrap Loan Program, which is also available to SHCs. Finally, the Housing Trust Fund also provides the Contract for Deed Conversion Program Assistance Grants are two types of grants that support eligible nonprofits and units of local government in assisting eligible colonia households with incomes 60% or less of the Area Median Income ("AMI") to convert their contracts for deeds to warranty deeds.</p>

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of Con Plan: \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	\$24,300,000	\$3,000,000	\$0	\$27,300,000	\$109,200,000	TDHCA's HOME Program goals are described in the Strategic Plan Section 45 for multifamily and single family activities. Single family HOME homebuyer activity may be coordinated with TDHCA's My First Texas Home Program, which can supplement down payment assistance, and the MCC Program, which provides a yearly tax credit of up to \$2,000 annually that reduced the homebuyers' federal income tax liability. HOME Multifamily Development Funds can be layered with 4% HTC's and 9% HTC's. In addition, TDHCA's Section 811 PRA, a project-based supportive housing program for persons with disabilities, and TDHCA's Section 8 HCV may be used within HOME developments. Starting in 2015, TDHCA's TCAP Loan Repayments and NSP PI may be used to supplement or support multifamily and single-family HOME activities starting in 2015. In addition, TDHCA also develops rules that govern all multifamily programs, including the HOME Multifamily Development Program, known as the Uniform Multifamily Rules.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of Con Plan: \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOPWA	public - federal	Permanent housing in facilities Permanent housing placement Short term or transitional housing facilities STRMU Supportive services TBRA	\$2,922,632	\$0	\$0	\$2,922,632	\$11,690,528	DSHS' HOPWA state formula funds the following activities: Tenant-based rental assistance ("TBRA"); Short Term Rent, Mortgage and Utilities ("STRMU"); Permanent Housing Placement ("PHP"); and Supportive Services. Project Sponsors leverage available funds from Ryan White and State Services grants to assist clients with housing needs, medical and non-medical case management, emergency utility assistance, mental health, transportation, and nutritional services to address the needs of eligible clients.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of Con Plan: \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	\$8,239,076	\$0	\$0	\$8,239,076	\$41,195,380	TDHCA's ESG funds are awarded via contract to Subrecipient agencies that provide emergency shelter, homelessness prevention, rapid rehousing, and Homeless Management Information Systems ("HMIS") activities. HHSP is Texas state general revenue funding for the eight largest cities to provide flexibility to undertake activities that complement ESG activities. Note that not all ESG direct recipients in Texas are HHSP grantees.

Table 1 - Expected Resources – Priority Table

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

HOME Program Leverages and Provides Match

HOME multifamily development is most often used to leverage with the HTC Program, which was created by the Tax Reform Act of 1986 and authorizes 9% low-income housing tax credits in the amount of \$2.30 per capita for each state, and 4% low-income housing tax credits in amounts linked to the usage of the state’s cap for issuance of tax exempt bond to finance affordable housing development. In Texas, this equates to approximately \$61,400,000 in 9% tax credits available to be awarded by TDHCA annually. These credits may be claimed each year for ten years and this represents potential tax credit value on the magnitude of \$610,000,000. The tax credits are syndicated to limited partner investors to yield cash for use in eligible development activities. Currently typical syndication rates range between 92% and 95%. TDHCA must develop a Qualified Allocation Plan (“QAP”) for the selection of eligible developments to provide housing for the low-income tenants. HOME provides increased leverage, allowing the property owners to utilize fewer tax credits and less private debt and local funding, therefore providing more efficient use of resources.

Matching requirements for the HOME Multifamily Development Program will be met through the Rules that establish the awardee's minimum amount of match as 5% of the award amount. Match comes in the form of donated labor and materials, donated professional services from an architect or engineer, grants from cities or nonprofits, and waived fees by municipalities. Also, TDHCA is planning to increase match requirements for single family activities to more effectively use limited funding.

ESG Program Leverages and Provides Match

In 2011, the Texas Legislature statutorily created the HHSP statute and funded it with General Revenue. Through HHSP, the State allocates funds into the eight largest cities in Texas to support services to homeless individuals and families. These funds are sometimes used as match for either State or local ESG funding.

To meet the ESG match requirement, TDHCA includes match as part of the application process used with its Subrecipients. Subrecipient agencies are required to match 100% of their ESG award. A Subrecipient that is unable to match the award is eligible to apply to TDHCA for a match waiver of up to \$100,000. However, these requests have been quite rare. In coming ESG program years, TDHCA will actively determine which organization(s) will benefit from the match waiver.

HOPWA Leverages and Provides Match

Texas HOPWA does not have program income but leverages funds whenever possible. Project Sponsors leverage available funds from Ryan White and State Services grants, private funding sources, foundations, and local assistance to help clients. Administrative Agencies (“AAs”) do not receive administrative funds from DSHS, so those costs are leveraged from other funding sources.

CDBG Leverages and Provides Match

Nearly 80% of Texas CDBG grants include local matching fund commitments. Matching funds are required for certain grants, while other grants award points to encourage local match; a sliding scale allows smaller communities to contribute less match funding than larger communities.

Match funds may be provided by the applicant, or by a water or sewer utility benefiting from the project. Economic development projects benefiting private business require 1-for-1 match commitment, with the business most often providing this substantial match.

Recent updates to the Colonia SHC Program rules have capped program assistance at \$50,000 per household for reconstruction and new construction, and \$40,000 per household for rehabilitation. These limits encourage administrators to leverage their funds with other resources as well as assist more households than in prior year.

If appropriate, describe publicly owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

The Texas General Land Office manages state owned lands and mineral rights totaling approximately 13 million acres. Much of this is leased for the benefit of the Permanent School Fund, an endowment fund established in 1876 for the benefit of Texas public school education. There is currently no plan to use state owned land for affordable housing or community development goals; however, local jurisdictions occasionally donate land or property in support of activities designed to address the needs identified in the plan as part of their contribution to locally administered programs.

Discussion

Continuing with the discussion of collaboration begun in the Introduction of this section, DSHS is the lead for several HIV-related councils and workgroups which provide opportunities for collaboration and resource sharing across agencies, providers, and other pertinent stakeholders to assist people living with HIV (“PLWH”) in Texas. Some of the initiatives are Inter-Agency Council on HIV & Hepatitis, the Texas Black Women’s Initiative, the Test Texas Coalition, and the Texas HIV Syndicate. The Texas HIV Syndicate is an integrated HIV prevention and care planning body made up of roughly 100 organizational leaders representing the full continuum of HIV engagement. The Texas HIV Syndicate uses the Texas HIV Plan as a framework to develop strategies that enhance and expand on prevention and care activities across the State. Texas HIV Syndicate members develop policy recommendations, best practice models, coordination strategies, and promote innovation in HIV prevention and treatment. DSHS also holds a biennial HIV/Sexually Transmitted Disease (“STD”) conference, attended by all DSHS contractors and subrecipients in addition to community leaders, health and HIV professionals, and many other essential stakeholders. Many of the DSHS contractors are also HOPWA providers. This year, the conference is August 19-21, 2014 in Austin, and invitations for two waived registrations have been extended to HUD. The goal of the Texas HIV/STD Conference is to enhance the responsiveness of people and systems supporting the spectrum of HIV/STD prevention and treatment services in Texas, including: Awareness; Targeted Prevention; Diagnosis; Linkage to Care; Maintenance in Care; and Suppression of Disease.

DSHS’ Epidemiology and Surveillance Branch is responsible for reporting HIV/AIDS, STD, and tuberculosis (“TB”) surveillance and epidemiologic data for the State of Texas, which includes data submission to the Centers for Disease Control and Prevention (“CDC”). This data is subsequently used by HUD to determine HOPWA formula allocations. This data is also leveraged to provide support to planning, development, implementation, and evaluation of HIV/AIDS, STD, and TB prevention and services programs, including HOPWA.

Finally, TDA participates in the following workgroups:

Texas Water Infrastructure Coordination Committee (“TWICC”): TWICC is a voluntary organization of federal and state funding agencies and technical assistance providers that address water and wastewater needs throughout the State. TDA participates in TWICC to coordinate efforts to leverage funds.

Secretary of State’s Colonia Workgroup: The Colonia Workgroup consists of federal and state funding agencies and the Texas Secretary of State’s colonia ombudsmen. The group addresses current and

future infrastructure improvements in colonias, focusing on coordination of resources and information. TDHCA is also a member of this workgroup.

Drought Preparedness Council: The Council was authorized and established by the 76th Texas Legislature in 1999, and is responsible for assessment and public reporting of drought monitoring and water supply conditions, along with other duties.

These workgroups, committees, and councils help to strengthen communication between state agencies as well as provide opportunities to layer or combine funding sources.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives – 91.320(c)(3)&(e)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Homeless Goals	2015	2016	Homeless	State of Texas	Rehabilitation of housing Homeless Outreach Emergency shelter and transitional housing Rapid Re-housing Homelessness Prevention	ESG: \$8,239,076	Tenant-based rental assistance / Rapid Rehousing: 4570 Households Assisted Homeless Person Overnight Shelter: 10,711 Persons Assisted Homelessness Prevention: 6,248 Persons Assisted
2	Construction of single family housing	2015	2019	Affordable Housing Non-Homeless Special Needs	State of Texas	Production of new units	HOME: \$672,514	Homeowner Housing Added: 7 Household Housing Unit
3	Rehabilitation of single family housing	2015	2019	Affordable Housing Non-Homeless Special Needs	State of Texas	Rehabilitation of housing	HOME: \$5,611,175	Homeowner Housing Rehabilitated: 66 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Homebuyer assistance with possible rehabilitation	2015	2019	Affordable Housing Non-Homeless Special Needs	State of Texas	Rehabilitation of housing Acquisition of existing units	HOME: \$2,408,057	Direct Financial Assistance to Homebuyers: 40 Households Assisted
5	Tenant-Based Rental Assistance with HOME funding	2015	2019	Affordable Housing Non-Homeless Special Needs	State of Texas	Rental Assistance	HOME: \$5,611,175	Tenant-based rental assistance / Rapid Rehousing: 510 Households Assisted
6	Households in new/rehabilitated multifamily units	2015	2019	Affordable Housing Non-Homeless Special Needs	State of Texas	Production of new units Rehabilitation of housing	HOME: \$7,548,535	Rental units constructed: 60 Household Housing Unit Rental units rehabilitated: 15 Household Housing Unit
7	HOPWA Tenant-Based Rental Assistance	2015	2019	Affordable Housing Non-Homeless Special Needs	State of Texas	Supportive Services for Persons with HIV/AIDS	HOPWA: \$1,729,322	Tenant-based rental assistance / Rapid Rehousing: 440 Households Assisted
8	HOPWA Short-Term Rent, Mortgage, & Utilities Asst	2015	2019	Affordable Housing Non-Homeless Special Needs	State of Texas	Supportive Services for Persons with HIV/AIDS	HOPWA: \$453,593	Homelessness Prevention: 470 Persons Assisted
9	HOPWA Permanent Housing Placement Assistance	2015	2019	Affordable Housing Non-Homeless Special Needs	State of Texas	Supportive Services for Persons with HIV/AIDS	HOPWA: \$8,505	Public service activities other than Low/Moderate Income Housing Benefit: 13 Persons Assisted
10	HOPWA-Funded Supportive Services	2015	2019	Affordable Housing Non-Homeless Special Needs	State of Texas	Supportive Services for Persons with HIV/AIDS	HOPWA: \$463,593	Public service activities other than Low/Moderate Income Housing Benefit: 910 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
11	CDBG Other Construction	2015	2019	Non-Housing Community Development	State of Texas	Public facilities Public Improvements and Infrastructure Public services	CDBG: \$44,886,148	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 227,843 Persons Assisted
13	CDBG Economic Development	2015	2019	Non-Housing Community Development Economic Development	State of Texas	Public facilities Public Improvements and Infrastructure Public services Economic development	CDBG: \$14,873,609	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 14,122 Persons Assisted
14	CDBG Planning / Capacity Building	2015	2019	Non-Housing Community Development	State of Texas	Public facilities Public Improvements and Infrastructure Public services	CDBG: \$560,495	Other: 37,412 Other (persons benefiting from community planning projects)
15	CDBG Disaster Relief / Urgent Need	2015	2019	Non-Housing Community Development	State of Texas	Public facilities Public Improvements and Infrastructure	CDBG: \$9,407,233	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 13,2248 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
16	CDBG Colonia Funds	2015	2019	Affordable Housing Non-Housing Community Development	State of Texas	Production of new units Rehabilitation of housing Acquisition of existing units Public facilities Public Improvements and Infrastructure Public services	CDBG Colonias Set-aside: \$6,143,915	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 3,348 Persons Assisted Other: 4,200 Other (colonia residents receiving direct assistance)

Table 2 – Goals Summary

Goal Descriptions

1	Goal Name	Homeless Goals
	Goal Description	Goals for the 2015 ESG program are to provide 10,711 homeless persons with emergency shelter, 4,570 households with emergency housing assistance through rapid re-housing, and 6,248 persons will be provided with housing assistance, including homelessness prevention assistance. This translates into funding of approximately 43% for rapid-rehousing; 36% for homelessness prevention; and 21% for emergency shelters and transitional housing, homeless outreach, and rehabilitation of housing. The funding targets and numbers served may fluctuate depending on the final HUD allocation. The amounts targeted for each ESG activity will be dependent on the final HUD allocation and the percentages (as limited by federal rules) will depend on local CoC or subrecipient decisions.

2	Goal Name	Construction of single family housing
	Goal Description	The 2015 goal for HOME Program single family development activities is to provide assistance to a minimum of 7 eligible households qualified by a Community Housing Development Organization ("CHDO") to receive assistance for the construction of a new home. The estimated funding and number of households served may fluctuate depending on HUD's final allocation amounts and based on the target percentages identified in Action Plan Section 25.
3	Goal Name	Rehabilitation of single family housing
	Goal Description	The 2015 goal for HOME Program rehabilitation and reconstruction activities is to provide assistance to a minimum of 35 households through a statewide network of units of general local governments, and non-profit organizations. These entities qualify applicants to receive assistance for the repairs necessary to make their homes decent, safe, sanitary, and accessible. The estimated funding and number of households served may fluctuate depending on HUD's final allocation amounts and based on the target percentages identified in Action Plan Section 25.
4	Goal Name	Homebuyer assistance with possible rehabilitation
	Goal Description	The 2015 goals for HOME Program acquisition activities is to provide assistance to a minimum of 40 households with downpayment and closing costs assistance, contract for deed conversion assistance to promote the conversion of contract for deed arrangements to traditional mortgages, as well as downpayment with possible rehabilitation assistance for households with a member with a disability. The estimated funding and number of households served may fluctuate depending on HUD's final allocation amounts and based on the target percentages identified in Action Plan Section 25.
5	Goal Name	Tenant-Based Rental Assistance with HOME funding
	Goal Description	The 2015 goal for HOME Program TBRA activity is to provide rental assistance to approximately 510 households through a statewide network of units of general local governments, public housing agencies, Local Mental Health Authorities ("LMHAs"), and other non-profit organizations. These entities qualify applicants to receive assistance and may extend assistance if the household continues to meet eligibility requirements. The estimated funding and number of households served may fluctuate depending on HUD's final allocation amounts and based on the target percentages identified in Action Plan Section 25.
6	Goal Name	Households in new/rehabilitated multifamily units
	Goal Description	The 2015 goal for HOME Multifamily Program is creating/rehabilitating over 75 multifamily rental units. TDHCA's HOME Multifamily Development Programs awards HOME funds as low-interest loans to for-profit and nonprofit developers. These loans leverage other public and private financing including housing tax credits, United States Department of Agriculture ("USDA") operating subsidies and loans, and conventional and Federal Housing Administration-insured loans. The end result is safe, decent, and affordable multifamily rental housing. The estimated funding and number of units created/rehabilitated may fluctuate depending on HUD's final allocation amounts and based on the target percentages identified in Action Plan Section 25.

7	Goal Name	HOPWA Tenant-Based Rental Assistance
	Goal Description	HOPWA TBRA provides tenant-based rental assistance to eligible individuals until they are able to secure other affordable and stable housing. The annual goal includes 440 households assisted. The estimated funding and number of individuals served may fluctuate depending on HUD's final allocation amounts and based on the target percentages identified in Action Plan Section 25.
8	Goal Name	HOPWA Short-Term Rent, Mortgage, & Utilities Asst
	Goal Description	STRMU provides short-term rent, mortgage, and utility payments to eligible individuals for a maximum of 21 weeks of assistance in a 52-week period. The annual goal is to assist 470 persons. The estimated funding and number of individuals served may fluctuate depending on HUD's final allocation amounts and based on the target percentages identified in Action Plan Section 25.
9	Goal Name	HOPWA Permanent Housing Placement Assistance
	Goal Description	PHP provides assistance for housing placement costs which may include application fees, related credit checks, and reasonable security deposits necessary to move persons into permanent housing. The annual goal is to assist 13 persons. The estimated funding and number of persons served may fluctuate depending on HUD's final allocation amounts and based on the target percentages identified in Action Plan Section 25.
10	Goal Name	HOPWA-Funded Supportive Services
	Goal Description	The Supportive Services program provides case management, basic telephone service and assistance to purchase smoke detectors to eligible individuals. The annual goal is to assist 910 persons. The estimated funding and number of persons served may fluctuate depending on HUD's final allocation amounts and based on the target percentages identified in Action Plan Section 25.
11	Goal Name	CDBG Other Construction
	Goal Description	The Texas CDBG encourages the use of funds not only to improve existing locations but to provide facilities in other areas to accommodate residential opportunities that will benefit low and moderate income persons. Applicants are encouraged to provide for infrastructure and housing activities that will improve opportunities for low and moderate income persons. When considering projects and designing projects, applicants must continue to consider affirmatively furthering fair housing, which includes providing basic infrastructure, such as water, sewer, and roads that benefit residential housing and other housing activities. Funding allocated includes annual allocation in addition to previously deobligated funds. The annual goal includes 227,843 persons assisted. The estimated funding and number of persons served may fluctuate depending on HUD's final allocation amounts and based on the target percentages identified in Action Plan Section 25.

13	Goal Name	CDBG Economic Development
	Goal Description	This economic development funding is used for projects that will create or retain permanent employment opportunities, primarily for low to moderate income persons and for county economic and management development activities. Funding allocated includes annual allocation in addition to previously deobligated funds. The annual goal is to assist 14,122 persons. The estimated funding and number of persons served may fluctuate depending on HUD's final allocation amounts and based on the target percentages identified in Action Plan Section 25.
14	Goal Name	CDBG Planning / Capacity Building
	Goal Description	This fund is available to assist eligible cities and counties in conducting planning activities that assess local needs, develop strategies to address local needs, build or improve local capacity, or that include other needed planning elements (including telecommunications and broadband needs). Funding allocated includes annual allocation in addition to previously deobligated funds. The annual goal is 37,539 persons benefiting from community planning projects (this may show as "other" in the chart above). The estimated funding and number of persons served may fluctuate depending on HUD's final allocation amounts and based on the target percentages identified in Action Plan Section 25.
15	Goal Name	CDBG Disaster Relief / Urgent Need
	Goal Description	Disaster Relief ("DR") assistance is available through this fund as needed for eligible activities in relief of disaster situations where either the governor has proclaimed a state disaster declaration, drought disaster declaration, or the president has issued a federal disaster declaration. CDBG may prioritize throughout the program year the use of DR assistance funds based on the type of assistance or activity under consideration and may allocate funding throughout the program year based on assistance categories. Funding allocated includes annual allocation in addition to previously deobligated funds. The annual goal is to assist 132,248 persons. The estimated funding and number of persons served may fluctuate depending on HUD's final allocation amounts and based on the target percentages identified in Action Plan Section 25.
16	Goal Name	CDBG Colonia Funds
	Goal Description	This fund is available to eligible county applicants for projects in severely distressed unincorporated areas which meet the definition of a "colonia" under this fund. Funding allocated includes annual allocation in addition to previously deobligated funds. The annual goal is to assist 3,348 benefiting from public facility or infrastructure activities (other than low/moderate income housing benefit) and 4,200 "other", which equates to the number of colonia residents receiving direct assistance. The estimated funding and number of persons served may fluctuate depending on HUD's final allocation amounts and based on the target percentages identified in Action Plan Section 25.

AP-25 Allocation Priorities – 91.320(d)

Introduction:

The CPD Programs meet the priority needs as found in Strategic Plan 25, as well as serving special needs populations. There are 13 Priority Needs listed in Strategic Plan 25. The Priority Needs in Strategic Plan 25 are correlated with Goals in Action Plan 20 to show which activities will serve which priority needs. The goals from Action Plan 20 are listed below with allocation percentages below each goal. Percentages in the chart below are estimated and may change depending on funding received from HUD, legislative priorities, and funding requests from administrators or subrecipients.

Also regarding the chart below, for the other programs listed in the anticipated resources (Action Plan Section 15) that could be used to leverage funds, including 4% HTC, 9% HTC, HHSP, Housing Trust Fund, MCC, and My First Texas Home Program, NSP PI, Section 8 HCV programs, Section 811 PRA, and TCAP Loan Repayments, goals are tailored to each program in the planning documents governing those programs. These documents can be found online at <http://www.tdhca.state.tx.us>. The CPD Programs are described in this section.

In addition to meeting the priority needs, the CPD Program works to serve special needs populations as described in this section. HOME and ESG's special needs populations are discussed in the introduction, and HOPWA and CDBG are included in the discussion below.

HOME Serves Special Needs

Programs designed to target assistance to special needs populations may include the elderly, frail elderly, persons with disabilities, persons with alcohol or other drug addiction, persons with HIV/AIDS, persons with Violence Against Woman Act ("VAWA") protections (e.g., domestic violence, dating violence, sexual assault, or stalking), colonia residents, farmworkers, homeless populations, veterans, wounded warriors (as defined by the Caring for Wounded Warriors Act of 2008), and public housing residents. Preferences may also include programs designed to assist veterans, households with a member who is pregnant, households with a member entering an institution of higher learning provided the household does not consist of an individual that is not eligible to receive Section 8 assistance on the basis of their student status, disaster victims, refugees or families of refugees, persons transitioning out of incarceration, and persons transitioning out of foster homes and nursing facilities.

For Administrators who have programs that are designed to limit assistance to certain populations, TDHCA will only approve program designs that limit assistance to households that include a member within the following populations: persons with HIV/AIDS, mental illness, alcohol or other drug addiction, or households that would qualify under the TDHCA's Project Access program as defined in 10 TAC §5.801. Otherwise, Administrators may only give preference to populations described in the special needs section.

TDHCA may also consider permitting rental housing owners to give a preference or limitation as indicated in this section and may allow a preference or limitation that is not described in this section, provided that another federal or state funding source for the rental housing requires a limitation or preference.

ESG Serves Special Needs

ESG does not have funding allocation priorities for special needs populations. However, in recent years the ESG Notice of Funding Availability ("NOFA") application scoring process provided up to 4% of the points eligible to be awarded for applicants proposing to serve persons with higher barriers (e.g., persons with serious mental illness, or persons recently released from an institution, or persons with substance-use disorder). The State ESG program typically funds a number of programs serving victims of domestic violence because those applications have scored well.

Funding Allocation Priorities

	CDBG	CDBG Colonias Set-aside	HOME	HOPWA	ESG
Homeless Goals (%)	0	0	0	0	100
Construction of single family housing (%)	0	0	3	0	0
Rehabilitation of single family housing (%)	0	0	25	0	0
Homebuyer assistance with possible rehabilitation (%)	0	0	11	0	0
Tenant-Based Rental Assistance with HOME funding (%)	0	0	26	0	0
Households in new/rehabilitated multifamily units (%)	0	0	35	0	0
HOPWA Tenant-Based Rental Assistance (%)	0	0	0	65	0
HOPWA Short-Term Rent, Mortgage, & Utilities Asst (%)	0	0	0	17	0
HOPWA Permanent Housing Placement Assistance (%)	0	0	0	1	0
HOPWA-Funded Supportive Services (%)	0	0	0	17	0
CDBG Other Construction (%)	66	0	0	0	0
CDBG Economic Development (%)	15	0	0	0	0
CDBG Planning/Capacity Building (%)	1	0	0	0	0
CDBG Disaster Relief/Urgent Need (%)	5	0	0	0	0
Colonias Set-Aside (%)	13	100	0	0	0
Total (%)	100	100	100	100	100

Table 3 – Funding Allocation Priorities

Reason for Allocation Priorities

HOME Allocation Priorities

TDHCA prioritizes HOME funding for multifamily, single-family, and Set-Aside activities. Multifamily activities were historically allocated a higher percent of funds to address the priority needs of Rental Assistance and Production of New Units, promote tax credit leveraging, and because they account for a large portion of HOME's program income. However, TDHCA now has access to TCAP Loan Repayments, so the priorities will continue to have funds directed toward them, while reducing the allocation of HOME funds.

For several years, single-family activities had not been prioritized individually. Funds were available as one large pot through the Reservation System, allowing local administrators to prioritize on a household-by-household basis for:

- Homebuyer Assistance, (including contract-for-deed conversions) which addresses Acquisition of Existing Units and Rehabilitation of Existing Units priority needs;
- Homeowner Rehabilitation Assistance, which addresses Rehabilitation of Existing Units priority need; and
- TBRA, which addresses Rental Assistance priority need.

As a result of the consolidated planning process, TDHCA will now prioritize funding for single-family activities. Because there are multiple sources available for downpayment assistance, TDHCA will reduce the amount available for this activity through HOME, while ensuring that funding remains available to convert contract-for-deeds into traditional mortgages and for households purchasing homes that require funds to make them physically accessible. TDHCA will focus on activities that address higher priority needs such as TBRA, which addresses the most common housing problem of cost burden, and homeowner rehabilitation assistance, which has high needs in rural areas as seen from public input.

ESG Allocation Priorities

ESG does not have allocation priorities for priority needs. ESG funds can be utilized for all eligible purposes within limitations set by ESG regulations and guided by local Continuum of Care ("CoC") direction, including:

- Homeless outreach;
- Emergency shelter and transitional housing;
- Rapid Re-housing; and
- Homelessness prevention.

HOPWA Allocation Priorities

HOPWA provides the following activities in line with priority needs:

- TBRA, which addresses Rental Assistance priority needs;
- STRMU, which addresses Homelessness Prevention priority needs;
- Supportive Services Program, which addresses Supportive Services for Persons with HIV/AIDS priority needs; and
- PHP, which addresses Homelessness Prevention priority needs

HOPWA STRMU and Supportive Services expenditures are usually similar, therefore DSHS initially allocated 17% for each activity, but will reallocate as needed.

CDBG Allocation Priorities

The CDBG Program offers the following activities, which relate to the corresponding priority needs. The majority of CDBG funds are used to meet basic human needs. These projects, in addition to being among the most critical needs in the state, are prioritized locally by regional review committees and local communities. Colonia funding allocation is reflected in "Colonias Set-Aside" column.

- The majority of funds are awarded to address basic human needs, including improvements to water and sewer systems and roads for low and moderate income ("LMI") communities.
- Economic development activities are funded to create and retain jobs primarily for LMI persons.
- Public facilities such as community centers and public safety facilities are less common activities, but are very valuable to LMI communities.
- Colonias SHC activities provide public services and housing funds for colonia residents living along the Texas-Mexico border.

How will the proposed distribution of funds will address the priority needs and specific objectives described in the Consolidated Plan?

The special needs populations for HOME and ESG are described in the Introduction. HOPWA and CDBG discuss special needs populations below.

HOPWA Serves Special Needs

Texas HOPWA serves PLWH and their family members, all of whom are at or below 80% of the AMI, and most of whom fall into the extremely-

low-income category. As previously noted, allocations generally mirror the Ryan White Program allocation formula, which takes into account population of PLWH, HIV incidence, number of PLWH accessing Ryan White services, percent of PLWH eligible for Medicaid and other considerations. The allocations are then adjusted based on unmet need, prior performance and expenditures, geographic-specific data provided by Project Sponsors, and any other relevant factors. After allocations to each HSDA are determined, it is then up to the Project Sponsor to allocate between activities of TBRA, STRMU, PHP, Supportive Services, and administrative expenses (not to exceed 7% of their allocation) and submit those to their AA and DSHS for approval. Project Sponsors base allocations on many factors, including but not limited to, number of clients projected to continue into the next year, area unmet need, rental costs, prior number of clients served, average expenditures per client, and changes in HIV population living in poverty, etc. Funds are also reallocated during the year within HIV Service Delivery Areas ("HSDAs") under each AA as needed when needs change.

CDBG Serves Special Needs

CDBG provides over 90% of available funds for projects that primarily benefit low-to moderate-income persons through basic infrastructure, housing, job creation and other activities as identified at the local level. Among those projects, CDBG sets aside 12.5% of funds to specifically benefit colonia residents through planning activities, infrastructure and housing construction, self-help center services, construction activities, and public services. Funding for community development projects in colonias and other LMI communities is a critical element in the well-being of these communities.

In 1996, in an effort to place more emphasis on addressing the needs of colonias, the OCI at TDCHA was created and charged with the responsibility of coordinating all TDHCA's and legislative initiatives involving border and colonia issues and managing a portion of TDHCA's existing programs targeted at colonias. The fundamental goal of the OCI is to improve the living conditions and lives of border and colonia residents and to educate the public regarding the services that the Department has to offer. As part of its plan to improve the living conditions in colonias, the OCI offers Border Field Offices. The three OCI Border Field Offices are located in Pharr, Laredo, and El Paso to provide technical assistance to border counties, Colonia SHCs, and Bootstrap Program participants.

AP-30 Methods of Distribution – 91.320(d)&(k)

Introduction:

Given that Texas is the second largest state in the nation by total area, the method of distribution of its funds has to take into account a very large area. To reach many areas of the State, the CPD Programs fund subrecipients to administer the funding. The selection processes for these entities are described below.

Distribution Methods

1. State Program Name:	Community Development Fund
Funding Sources:	CDBG
Describe the state program addressed by the Method of Distribution.	<p>The Community Development ("CD") Fund is available on a biennial basis through a competition in each of the State's 24 planning regions. The goal of the CD Fund is to develop viable communities by providing decent housing, viable public infrastructure, and a suitable living environment, principally for persons of low to moderate income.</p> <p>Applicants are encouraged to provide for infrastructure and housing activities that will improve opportunities for LMI persons. When considering and designing projects, applicants must continue to consider project activities that will affirmatively further fair housing, which includes project activities that provide basic infrastructure (such as water, sewer, and roads) that will benefit residential housing and other housing activities.</p>
Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	<p>CD applicants are scored using a shared system with 90% of the scoring criteria established by Regional Review Committees ("RRC") and 10% established by the state's scoring criteria. There is a Regional Review Committee in each of the 24 State planning regions. Each RRC will be comprised of 12 members appointed at the pleasure of the Texas Commissioner of Agriculture. A quorum of seven members is required for all public hearings. Each RRC is responsible for determining local project priorities and objective scoring criteria for its region for the CD Fund in accordance with the requirements in this Action Plan. Additionally, the RRC shall establish the numerical value of the points assigned to each scoring factor and determine the total combined points for all RRC scoring criteria. The Regional Review Committees are responsible for convening public hearings to discuss and select the objective scoring criteria that will be used to score and rank applications at the</p>

	<p>regional level. The public must be given an opportunity to comment on the priorities and the scoring criteria considered. The final selection of the scoring criteria is the responsibility of each RRC and must be consistent with the requirements in this Action Plan. The RRC may not adopt scoring factors that directly negate or offset the State's scoring factors. Each RRC shall develop a RRC Guidebook, in the format provided by TDA, to notify eligible applicants of the objective scoring criteria and other RRC procedures for the region. The Guidebook must be submitted to TDA and approved at least ninety days prior to the application deadline.</p> <p>The state scoring will be based on the following:</p> <ol style="list-style-type: none"> 1. Past selection - 4% of Maximum Possible RRC Score for each region. 2. Past Performance- 4% of Maximum Possible RRC Score for each region. 3. All project activities within the application would provide basic infrastructure or housing activities - 2% of Maximum Possible RRC Score for each region. (Basic infrastructure - the basic physical shared facilities serving a community's population consisting of water, sewage, roads and flood drainage. Housing activities - as defined in 24 Code of Federal Regulations ("CFR") Part 570.)
<p>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</p>	<p>Guidelines, applications and additional program documentation can be found on TDA's website at www.texasagriculture.gov.</p>
<p>Describe how resources will be allocated among funding categories.</p>	<p>61.71% of the State CDBG allocation is allocated to this fund.</p>
<p>Describe threshold factors and grant size limits.</p>	<p>Minimum \$75,000/Maximum \$800,000, regions may establish additional grant amount limits.</p>
<p>What are the outcome measures expected as a result of the method of distribution?</p>	<p>Activities Benefiting LMI Persons</p>

2. State Program Name:	Community Enhancement Fund
Funding Sources:	CDBG
Describe the state program addressed by the Method of Distribution.	The Community Enhancement Fund provides a source of funds (when available) not available through other CDBG programs to stimulate a community's economic development efforts and improve self-sufficiency. The project must have the potential to benefit all citizens within a jurisdiction. The community project must provide a benefit that will enhance the overall quality of life in the rural community.
Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	The selection criteria for the Community Enhancement Fund will focus on the following factors: a. LMI percentage of the applicant; b. Partnerships; c. Multi-Purpose Facility or Public Safety Equipment; d. Sustainability; and e. Match.
If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)	Guidelines, applications and additional program documentation can be found on TDA's website at www.texasagriculture.gov .
Describe how resources will be allocated among funding categories.	The amount for this funding category may be adjusted during the 2015 PY as needed.
Describe threshold factors and grant size limits.	Minimum \$50,000/Maximum \$350,000
What are the outcome measures expected as a result of the method of distribution?	Activities Benefiting LMI Persons

3. State Program Name:	Disaster Relief Funds
Funding Sources:	CDBG
Describe the state program addressed by the Method of Distribution.	<p>DR Fund assistance is available as needed for eligible activities in relief of disaster situations where either a state or federal disaster declaration has been issued. Priority for the use of these funds is for repair and restoration activities that meet basic human needs (such as water and sewer facilities, housing, and roads), with the only exception of new facilities to improve water supply under a Disaster Declaration for Drought.</p> <p>An applicant may not receive funding to construct public facilities that did not exist prior to the occurrence of the disaster, except in response to a Governor's drought disaster declaration covering the area that would benefit from the project activities, subject to the conditions set forth in Title 4, Part 1, Chapter 30, Subchapter A of the Texas Administrative Code.</p>
Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	<p>To qualify for the DR Fund:</p> <ul style="list-style-type: none"> a. The situation addressed by the applicant must be both unanticipated and beyond the control of the local government. b. The problem being addressed must be of recent origin. For DR Fund assistance, this means that the application for assistance must be submitted no later than 12 months from the date of the state or federal disaster declaration. c. Funds will not be provided under Federal Emergency Management Agency's ("FEMA's") Hazard Mitigation Grant Program for buyout projects unless TDA receives satisfactory evidence that the property to be purchased was not constructed or purchased by the current owner after the property site location was officially mapped and included in a designated flood plain area. d. Each applicant must demonstrate that adequate local funds are not available, i.e., the entity has less than six months of unencumbered general operations funds available in its balance as evidenced by the last available audit required by state statute, or funds from other state or federal sources are not available to completely address the problem. e. TDA may consider whether funds under an existing CDBG contract are available to be reallocated to address the situation. f. The distribution of these funds will be coordinated with other state agencies.

If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)	Guidelines, applications and additional program documentation can be found on TDA's website at www.texasagriculture.gov .
Describe how resources will be allocated among funding categories.	4.10% of the State CDBG allocation is allocated to the DR Fund.
Describe threshold factors and grant size limits.	Maximum \$350,000/Minimum \$50,000
What are the outcome measures expected as a result of the method of distribution	Meet other community development needs of particular urgency which represent an immediate threat to the health and safety of residents of the community.

4. State Program Name:	Urgent Need Fund
Funding Sources:	CDBG
Describe the state program addressed by the Method of Distribution.	<p>Urgent Need ("UN") Fund assistance is available for activities that will restore water and/or sewer infrastructure whose sudden failure has resulted in death, illness, injury, or poses an imminent threat to life or health within the affected applicant's jurisdiction. The infrastructure failure must not be the result of a lack of maintenance and must be unforeseeable. An application for UN Fund assistance will not be accepted until discussions between the potential applicant and representatives of TDA, TWDB, and the Texas Commission on Environmental Quality ("TCEQ") have taken place. Through these discussions, a determination shall be made whether the situation meets eligibility requirements and if a potential applicant should be invited to submit an application for the UN Fund.</p> <p>Construction on an UN Fund project must begin within ninety (90) days from the start date of the CDBG contract. TDA may de-obligate the funds under an UN Fund contract if the grantee fails to meet this requirement.</p>
Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	<p>To qualify for the UN Fund:</p> <ol style="list-style-type: none"> 1. The situation addressed by the applicant must not be related to a proclaimed state or federal disaster declaration. 2. The situation addressed by the applicant must be both unanticipated and beyond the control of the local government (e.g., not for facilities or equipment beyond their normal, useful life span). 3. The problem being addressed must be of recent origin. For UN assistance, this means that the situation first occurred or was first discovered no more than 30 days prior to the date that the potential applicant provides a written request to the TDA for UN assistance. UN funds cannot fund projects to address a situation that has been known for more than 30 days or should have been known would occur based on the applicant's existing system facilities. 4. Each applicant for these funds must demonstrate that local funds or funds from other state or federal sources are not available to completely address the problem. 5. The applicant must provide documentation from an engineer or other qualified professional that the infrastructure failure cannot have resulted from a lack of maintenance or been caused by operator error.

	<p>6. UN funds cannot be used to restore infrastructure that has been cited previously for failure to meet minimum state standards.</p> <p>7. The infrastructure requested by the applicant cannot include back-up or redundant systems.</p> <p>8. The UN Fund will not finance temporary solutions to the problem or circumstance.</p> <p>9. TDA may consider whether funds under an existing CDBG contract are available to be reallocated to address the situation, if eligible.</p> <p>10. The distribution of these funds will be coordinated with other state agencies.</p> <p>Each applicant for UN Funds must provide matching funds. If the applicant's most recent Census population is equal to or fewer than 1,500 persons, the applicant must provide matching funds equal to 10 percent of the CDBG funds requested. If the applicant's most recent Census population is over 1,500 persons, the applicant must provide matching funds equal to 20 percent of the CDBG funds requested. For county applications where the beneficiaries of the water or sewer improvements are located in unincorporated areas, the population category for matching funds is based on the number of project beneficiaries.</p>
If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)	Guidelines, applications and additional program documentation can be found on TDA's website at www.texasagriculture.gov .
Describe how resources will be allocated among funding categories.	Deobligated funds up to \$1,000,000 are made available for the UN Fund on the first day of a program year. Based on demand for assistance under each UN and DR portion of this fund, UN funds may be allocated for DR projects.
Describe threshold factors and grant size limits.	Maximum \$250,000/Minimum \$25,000
What are the outcome measures expected as a result of the method of distribution?	Meet other community development needs of particular urgency which represent an immediate threat to the health and safety of residents of the community.

5. State Program Name:	Planning/Capacity Building Fund
Funding Sources:	CDBG
Describe the state program addressed by the Method of Distribution.	The Planning/Capacity Building ("PCB") Fund is available to assist eligible cities and counties in conducting planning activities that assess local needs, develop strategies to address local needs, build or improve local capacity, or that include other needed planning elements (including telecommunications and broadband needs).
Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	The selection criteria for the PCB Fund will focus upon the following factors: a. Community Distress; a. Percentage of persons living in poverty; b. Per capita income; c. Unemployment rate; b. Benefit to LMI Persons; c. Project Design; d. Program Priority; e. Base Match; f. Area-wide Proposals; and g. Planning Strategy and Products.
If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)	Guidelines, applications and additional program documentation can be found on TDA's website at www.texasagriculture.gov .
Describe how resources will be allocated among funding categories.	1.0% of the State CDBG allocation is allocated to this fund.
Describe threshold factors and grant size limits.	Minimum \$0/Maximum \$55,000
What are the outcome measures expected as a result of the method of distribution?	Activities Benefiting LMI Persons

6. State Program Name:	Texas Capital Fund Downtown Revitalization Program
Funding Sources:	CDBG
Describe the state program addressed by the Method of Distribution.	The Texas Capital Fund ("TCF") Downtown Revitalization Program awards grant funds for public infrastructure to foster and stimulate economic development in rural downtown areas.
Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	The selection criteria for the TCF Downtown Revitalization Program will focus upon the following factors: a. Applicant Need criteria, including poverty rate, median income, unemployment rate, and community need; b. Project criteria, including leverage, economic development consideration, sidewalks projects, and ADA compliance, broad-based public support, emphasis on benefit to LMI persons, and grant application training; and c. Past Performance.
If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)	Guidelines, applications and additional program documentation can be found on TDA's website at www.texasagriculture.gov .
Describe how resources will be allocated among funding categories.	12% of the total TCF allocation up to a maximum of amount \$1,200,000
Describe threshold factors and grant size limits.	Maximum \$150,000/Minimum \$50,000
What are the outcome measures expected as a result of the method of distribution?	Eliminate or prevent slum and blight conditions.

7. State Program Name:	TCF Real Estate and Infrastructure Development Programs
Funding Sources:	CDBG
Describe the state program addressed by the Method of Distribution.	The TCF Real Estate and Infrastructure Development Programs provides grants and/or loans for Real Estate and Infrastructure Development to create or retain permanent jobs in primarily rural communities and counties.
Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	<p>The selection criteria for the TCF Real Estate and Infrastructure Development will focus upon the following factors:</p> <ul style="list-style-type: none"> a. Job creation criteria: <ul style="list-style-type: none"> i. Cost-per-job, ii. Job impact, iii. Wage impact, and iv. Primary jobs created/retained; b. Unemployment rate; and c. Return on Investment. <p>Once applications are evaluated and determined to be in the funding range the projects will be reviewed upon the following additional factors:</p> <ul style="list-style-type: none"> a. History of the applicant community in the program; b. Strength of the business or marketing plan; c. Evaluation of the business and the business' principal owners credit; d. Evaluation of community and business need; and e. Justification of minimum necessary improvements to serve the project.
If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)	Guidelines, applications and additional program documentation can be found on TDA's website at www.texasagriculture.gov .
Describe how resources will be allocated among funding categories.	14.51% of the State CDBG allocation is allocated to the Real Estate and Infrastructure Development Programs minus the lesser of 18% or \$1,800,000 of the total TCF allocation.
Describe threshold factors and grant size limits.	Maximum \$1,500,000/Minimum \$150,000
What are the outcome measures expected as a result of the method of distribution?	Activities Benefiting LMI Persons

8. State Program Name:	TCF Main Street Program
Funding Sources:	CDBG
Describe the state program addressed by the Method of Distribution.	The TCF Main Street Program provides eligible Texas Main Street communities with grants to expand or enhance public infrastructure in historic main street areas.
Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	The selection criteria for the TCF Main Street Program will focus upon the following factors: a. Applicant Need criteria, including poverty rate, median income, unemployment rate, and community need; b. Project criteria, including leverage, economic development consideration, sidewalks projects and Americans with Disabilities Act ("ADA") compliance, broad-based public support, emphasis on benefit to LMI persons, and grant application training; and c. Main Street program criteria, including National Main Street program recognition, Main Street program participation, historic preservation ethic impact.
If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)	Guidelines, applications and additional program documentation can be found on TDA's website at www.texasagriculture.gov .
Describe how resources will be allocated among funding categories.	6% of the total TCF allocation up to a maximum amount of \$600,000
Describe threshold factors and grant size limits.	Maximum \$150,000/Minimum \$50,000
What are the outcome measures expected as a result of the method of distribution?	Eliminate or prevent slum and blight conditions.

9. State Program Name:	Texas Small Towns Environment Program Fund
Funding Sources:	CDBG
Describe the state program addressed by the Method of Distribution.	<p>The Texas Small Towns Environment Program ("STEP") Fund provides funds to cities and counties that recognize the need and potential to solve water and sewer problems through self-help techniques via local volunteers. By utilizing the resources of the community (human, material, and financial), the necessary construction, engineering, and administration costs can be reduced significantly from the cost for the installation of the same improvements through conventional construction methods.</p> <p>The self-help response to water and sewer needs may not be appropriate in every community. In most cases, the decision by a community to utilize self-help to obtain needed water and sewer facilities is based on the realization of the community that it cannot afford even a basic water or sewer system based on the initial construction costs and the operations/maintenance costs (including debt service costs) for water or sewer facilities installed through conventional financing and construction methods.</p>
Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	<p>The following are the selection criteria to be used by CDBG staff for the scoring of assessments and applications under the Texas STEP Fund:</p> <ol style="list-style-type: none"> Project Impact STEP Characteristics, Merits of the Project, and Local Effort Past Participation and Performance Percentage of Savings off of the retail price Benefit to Low/Moderate-Income Persons
If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)	Guidelines, applications and additional program documentation can be found on TDA's website at www.texasagriculture.gov .
Describe how resources will be allocated among funding categories	3.01% of the State CDBG allocation is allocated to this fund.
Describe threshold factors and grant size limits.	Maximum \$350,000/Minimum \$0
What are the outcome measures expected as a result of the method of distribution?	Activities Benefiting LMI Persons

10. State Program Name:	General HOME Funds for Single-Family Activities
Funding Sources:	HOME
Describe the state program addressed by the Method of Distribution.	TDHCA awards single-family activity funds as grants and loans through a network of local administrators for Homeowner Rehabilitation, Homebuyer Assistance, and TBRA. Assistance length and term depends on the type of activity. The funds are initially made available on a regional basis, then later remaining funds are made available statewide through a contracting process, a first-come, first-served Reservation System, or a combination of the two. The method is described in NOFAs and is informed by needs analysis, oversubscription for the activities, and public input.
Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	Applicants must comply with requirements stated in NOFAs, the Single-Family Programs Umbrella Rule, and State HOME Program Rules in effect at the time they receive their award.
Describe how resources will be allocated among funding categories.	TDHCA announces the annual allocation of HOME Single-Family funds through a NOFA and specifies that the funds will initially be made available using a Regional Allocation Formula ("RAF") which divides funds among 26 sub-regions as required by state statute. The allocation method is developed based on a formula which considers need and funding availability and is typically 3 months. Following the release of the annual allocation through the RAF, TDHCA periodically adds HOME program income and deobligated funds to the funds available via the Reservation System and either allocates a specific amount of funds per activity based on funding priorities or may allow HOME administrator's requests for funding through the system determine how the funds are finally allocated among fund categories. Beginning in PY 2015, TDHCA may specify the maximum amount of funds that will be released for each activity type and may allocate funds in via a first come, first served Reservation System or alternate method based on public comment.
Describe threshold factors and grant size limits.	Applicants must comply with requirements stated in the HOME NOFA and State HOME Program Rules in effect the year they receive their award. These sources provide threshold limits and grant size limits per activity type.
What are the outcome measures expected as a result of the method of distribution?	Assistance to LMI households.

11. State Program Name:	HOME Multifamily Development
Funding Sources:	HOME
Describe the state program addressed by the Method of Distribution.	The HOME Multifamily Development Program awards loans to for-profit and nonprofit multifamily developers to construct and rehabilitate affordable rental housing. These loans typically carry a 0% to 5% interest rate and have terms ranging from 15 years to 40 years. The vast majority of the loans are made in conjunction with awards of 4% or 9% HTCs.
Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	TDHCA's Uniform Multifamily Rules set forth a minimum set of requirements that document a project owner's readiness to proceed with the development as evidenced by site control, notification of local officials, the availability of permanent financing, appropriate zoning for the site, and a market and environmental study. Additionally, the development must be near certain community assets such as a bank, pharmacy, or medical office and have certain unit amenities and common amenities. HOME Multifamily Development Program funds are typically awarded on a first-come, first-served basis, as long as the criteria above are met. For HOME Multifamily Development applications layered with 9% HTCs, the highest scoring applications in the 9% cycle that also request HOME funds take priority over lower scoring HOME Multifamily Development applications that may have been received earlier.
Describe how resources will be allocated among funding categories.	Typically, of the HOME Multifamily Funds, 85% is available for General activities and 15% for CHDO. However, the HOME Multifamily Development Program may make funds available annually under the General, Persons With Disabilities, and CHDO Set-Asides.
Describe threshold factors and grant size limits.	TDHCA's Uniform Multifamily Rules set forth a minimum set of requirements that document a project owner's readiness to proceed with the development as evidenced by site control, notification of local officials, the availability of permanent financing, experience of the developer, appropriate zoning for the site, and a market and environmental study. Additionally, the development must be near certain community assets such as a bank, pharmacy, or medical office and have certain unit amenities and common amenities. Awards of HOME Multifamily Development Program funds range from approximately \$300,000 to \$3 million per application in the form of a loan.
What are the outcome measures expected as a result of the method of distribution?	Assistance to LMI households

12. State Program Name:	Texas ESG Program
Funding Sources:	ESG
Describe the state program addressed by the Method of Distribution.	The ESG Program is currently a competitive grant that awards funds to private nonprofit organizations, cities, and counties in the State of Texas to provide the services necessary to help persons that are at-risk of homelessness or homeless quickly regain stability in permanent housing. During the next several years, TDHCA is working toward a plan that will provide funds directly to Texas CoCs, giving them more local control of the use of funds in their service areas.
Describe all of the criteria that will be used to select applications and the relative importance of these criteria	<p>In the competitive process, applications are selected based on:</p> <ul style="list-style-type: none"> • Proposed Budget, Outcomes, and Match (30%); • Organizational Capacity & Project Design (30%); • Past Performance in Homeless Program Delivery (25%); • CoC Participation and Coordination (15%); • Financial Information (negative scores only); • Past Performance of Subrecipients in ESG Expenditure and Reporting (negative scores only); and • Other Deductions: (audit findings, etc; negative scores only). <p>When released via CoCs, the allocation amounts will be established by formula, and the CoCs will in turn use distribution models locally that will be approved by TDHCA.</p>
Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government, and non-profit organizations, including community and faith-based organizations. (ESG only)	<p>For the competitive process, Texas releases a NOFA each spring in anticipation of receiving ESG funding. Applications are accepted for generally a 30-day period. Applications are scored and ranked within their CoC regions. CoC regions are funded according to the combination of the region's proportionate share of the state's total homeless population, based on the most recent Point-in-Time count submitted to HUD by the CoCs, and the region's proportionate share of people living in poverty, based on the most recent 5-year American Community Survey poverty data published by the Census Bureau. For the purposes of distributing funds, the percentage of statewide homeless population is weighted at 75% while the percentage of statewide population in poverty is weighted at 25%. This formula will be used when funding CoCs directly.</p> <p>Eligible applicant organizations are Units of General Purpose Local Government, including cities,</p>

	<p>counties and metropolitan cities, and urban counties that receive ESG funds directly from HUD. Governmental organizations such as Councils of Governments ("COGs"), LMHAs, and Public Housing Authorities ("PHAs") are not eligible and cannot apply directly for ESG funds; however COGs, LMHAs, and PHAs may serve as a partner in a collaborative Application but may not be the lead entity. These same criteria will apply to those entities with awards coming directly from the CoCs as well.</p> <p>Eligible applicant organizations include private nonprofit organizations that are secular or religious organizations described in section 501(c) of the Internal Revenue Code of 1986, are exempt from taxation under subtitle A of the Code, have an acceptable accounting system and a voluntary board, and practice non-discrimination in the provision of assistance. Faith-based organizations receiving ESG funds, like all organizations receiving HUD funds, must serve all eligible beneficiaries without regard to religion.</p>
<p>Describe how resources will be allocated among funding categories.</p>	<p>ESG funds may be used for six program components: street outreach, emergency shelter, homelessness prevention, rapid re-housing assistance, and HMIS, as well as administrative activities. Per 24 CFR §576.100(b), the total amount of an Applicant's budget for street outreach and emergency shelter cannot exceed 60% of their total requested amount. Within a collaborative Application, the 60% limit applies to the entire Application and not to each partner within the collaborative Application. This requirement will also apply in the direct CoC funding method.</p>
<p>Describe threshold factors and grant size limits.</p>	<p>Pre-screening requirements that may limit grant size or make an application ineligible for funding:</p> <ul style="list-style-type: none"> • Submitting any of the application threshold documents (all of the documents that are part of the scoring criteria or rating factors) after the application deadline; • Failing to submit the application documents through the electronic submission process specified in the NOFA; • For entities that received prior-year ESG funds, having final expenditure rates below 50% of the award allocation; and/or • An applicant or collaborative partner being legally ineligible to be awarded in ESG funding for reasons including to but not limited to debarment or not being an eligible lead entity.

	<p>Threshold documents include</p> <ul style="list-style-type: none"> • Proposed budget, outcomes, and match; • Organizational capacity and project design; • Past performance on Homeless Program Delivery; • Certificate of CoC participation and coordination; and • Financial information (audit). <p>Within each CoC region, applicants may request no less than \$125,000 unless the initial amount available in the region is less than \$125,000. In those cases, applicants may request an amount no less than the available allocation for that region. Single applicants may request a maximum of \$150,000. For a collaborative application, the maximum request amount is \$150,000 times the number of partners in the application, with a maximum request of \$600,000. The minimum request for a collaborative application is \$125,000, unless the initial amount available in the region is less than \$125,000. In those cases the collaborative applicant may request an amount no less than the available allocation for that region. In a collaborative application, each partner is not limited to budgeting \$150,000 each; the total grant amount may be budgeted among all partners as agreed upon. These numbers may be adjusted depending on the final allocation from HUD. If funds are being provided directly to CoCs, they will establish these factors and limits with TDHCA approval. They will not necessarily reflect these factors, but will reflect a local decision-making process.</p>
<p>What are the outcome measures expected as a result of the method of distribution?</p>	<p>The expected outcome is that funds will be awarded to organizations that have the administrative and performance capacity to provide the services needed in their communities. The expected outcome of TDHCA's plan to fund the CoCs directly is that the same will be accomplished, but with CoC wide planning rather than with only state planning.</p>

13. State Program Name:	Texas HOPWA Program
Funding Sources:	HOPWA
Describe the state program addressed by the Method of Distribution.	DSHS selects seven AAs across the state through a combination of competitive Requests for Proposal ("RFP") and intergovernmental agency contracts. The AAs act as an administrative arm for DSHS by administering the HOPWA program locally. The AAs do not receive any HOPWA administrative funds from DSHS; all AA administrative costs are leveraged from other funding sources. The AAs, in turn, select HOPWA Project Sponsors to cover all 26 HIV Service Delivery Areas ("HSDAs") through local competitive processes.
Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	<p>Information on grant applications, available funding opportunities, application criteria, General Provisions, contract requirements, etc. can be found on the DSHS website: http://www.dshs.state.tx.us/grants/default.shtm.</p> <p>The Client Services Contracting Unit ("CSCU") is in the Office of the Chief Financial Officer and handles the solicitation, contract development, and contract execution for DSHS. CSCU contracts primarily for client services related needs; however, CSCU also handles additional types of procurements. CSCU is the office of record for all DSHS client contracts.</p> <p>The DSHS General Provisions ("GPs") have multiple formats and are posted on the General Provisions web page as they are completed: Core/Subrecipient.</p> <p>Evaluation Criteria as noted in the most recent RFP process for AAs for Ryan White/State Services and HOPWA programs were: Respondent Background = 30%; Assessment Narrative = 15%; Performance Measures = 10%; Work Plan = 35%; and Budget = 10%.</p>
Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations). (HOPWA only)	The AAs select HOPWA Project Sponsors to cover all 26 HSDAs through local competitive processes. Community-based organizations, minority organizations, minority providers, grassroots and faith-based organizations are encouraged to apply. Historically, many of the agencies that have provided services to TDHCA's client population are grassroots, community-based, and minority organizations.

<p>Describe how resources will be allocated among funding categories.</p>	<p>Texas HOPWA funding allocations are geographically distributed across the state to the 26 HSDAs based on factors such as population with HIV and unmet need. Texas HOPWA serves persons and their family members living with HIV, all of whom are at or below 80% of AMI, and most fall into the extremely low-income category. Allocations generally mirror the Ryan White Program allocation formula, which takes into account population of PLWH, HIV incidence, number of PLWH accessing Ryan White services, percent of PLWH eligible for Medicaid and other considerations. The allocations are then adjusted based on unmet need, prior performance and expenditures, geographic-specific data provided by Project Sponsors, and any other relevant factors. After allocations to each HSDA are determined, it is then up to the Project Sponsor to allocate between activities of TBRA, STRMU, PHP, Supportive Services, and administrative expenses (not to exceed 7% of their allocation) and submit those to their AA and DSHS for approval. Project Sponsors base allocations on many factors, including but not limited to, number of clients projected to continue into the next year, area unmet need, rental costs, prior number of clients served, average expenditures per client, and changes in HIV population living in poverty, etc. Funds are also reallocated during the year within HSDAs under each AA as needed when needs change.</p>
<p>Describe threshold factors and grant size limits.</p>	<p>Texas HOPWA serves persons and their family members living with HIV, all of whom are at or below 80% of AMI.</p> <p>The majority of HOPWA clients are classified as extremely low income, which is between 0% and 30% of AMI.</p>
<p>What are the outcome measures expected as a result of the method of distribution?</p>	<p>Outcome measures are number of unduplicated income-eligible clients and families living with HIV (households) assisted with each HOPWA service category (TBRA, STRMU, PHP if applicable, and Supportive Services).</p>

Table 4 - Distribution Methods by State Program

ADDITIONAL DETAIL ON METHOD OF DISTRIBUTION 2015 ACTION PLAN - COMMUNITY DEVELOPMENT FUND

Funds for projects under the CD Fund are allocated among the 24 State planning regions based on the following:

The original CD formula is used to allocate 40% of the annual State CDBG allocation.

- Original CD formula (40%) factors:
 - a. Non-Entitlement Population 30%
 - b. Number of Persons in Poverty 25%
 - c. Percentage of Poverty Persons 25%
 - d. Number of Unemployed Persons 10%
 - e. Percentage of Unemployed Persons 10%

- To the extent possible, the information used to calculate the regional allocations through these factors will be based on the eligible non-entitlement applicants within each region. The population and poverty information used is from the current available decennial census data. The unemployment information used is the current available annual average information. TDA does not provide priorities for allocation of funds geographically to areas of minority concentration as described in Section 91.320(f).

The HUD formula is used to allocate 21.71% of the annual State CDBG allocation.

- The formula is the same methodology that HUD uses to allocate CDBG funds among the States for use in non-entitlement areas. The HUD factors, percentages, and methodology are specified in 42 USC. §5306(d). TDA will use available data to calculate the allocations to each region.

- Using the HUD methodology, the allocation for each region shall be the greater of an amount that bears the same ratio to the allocation for all 24 regions available as either:

(A) the average of the ratios between:

- o the population of the non-entitlement areas in that region and the population of the nonentitlement areas of all 24 regions (counted one time - 25% weight);
- o the extent of poverty in the non-entitlement areas in that region and the extent of poverty in the non-entitlement areas of all 24 regions (counted two times - 50% weight); and
- o the extent of housing overcrowding in the non-entitlement areas in that region and the extent of housing overcrowding in the non-entitlement areas of all 24 regions (counted one time - 25% weight);

OR

(B) the average of the ratios between:

- o the age of housing in the non-entitlement areas in that region and the age of housing in the nonentitlement areas in all 24 regions (counted two and one half times - 50% weight);
- o the extent of poverty in the non-entitlement areas in that region and the extent of poverty in the non-entitlement areas of all 24 regions (counted one and one half times - 30% weight); and
- o the population of the non-entitlement areas in that region and the population of the nonentitlement areas of all 24 regions (counted one time - 20% weight).

ADDITIONAL DETAIL ON METHOD OF DISTRIBUTION 2015 ACTION PLAN - DEOBLIGATED FUNDS

Deobligated Funds

On the first day of the program year, any unallocated deobligated funds and other available program income (not derived from TCF real estate projects) will be allocated as follows:

1. 20% shall be allocated to the DR Fund;
2. 80% shall be allocated to those fund categories that do not have allocations prescribed by federal or state law.

The allocation shall be based on the pro-rata share of the percentages specified in Section AP-30 of this Action Plan. Allocations to the CD Fund will be distributed to each of the 24 Planning Regions based upon the methodology used in calculating the annual regional allocation. Allocations to regions that either (a) have no eligible applications, or (b) cannot fully fund the next highest ranking applications will be made available to the CD Fund (to other regions with eligible applications) or to the DR Fund.

ADDITIONAL DETAIL ON METHOD OF DISTRIBUTION 2015 ACTION PLAN - UNOBLIGATED FUNDS

Unobligated Funds

For an award that is withdrawn from an applicant, the TDA follows different procedures for the use of those recaptured funds depending on the fund category in which the award is withdrawn.

1. The CD Fund – funds from the withdrawal of an award shall be offered to the next highest ranked applicant from that region that was not recommended to receive an award due to depletion of the region's allocation. A marginal amount may be offered to the next highest ranked applicant as long as the amount of funds still available exceeds the minimum CD Fund grant amount. Any funds remaining from a regional allocation that are not accepted by an applicant, that are not offered to an applicant, or remain due to lack of additional, unfunded applications, may be allocated among regions with eligible, unfunded applications. If unallocated to another region, they are then subject to the procedures used to allocate Deobligated Funds.

2. The PCB Fund – funds from the withdrawal of a PCB award are offered to the next highest ranked applicant that was not recommended to receive an award due to depletion of the fund's annual allocation. A marginal amount may be offered to the next highest ranked applicant as long as the amount of funds still available exceeds the minimum grant amount. Any funds remaining from the allocation that are not accepted by an applicant from the statewide competition or that are not offered to an applicant from the statewide competition may be used for other CDBG fund categories and, if unallocated to another fund, are then subject to the procedures used to allocate Deobligated Funds.

3. The Colonia Funds – funds from the withdrawal of any Colonia Fund award remain available to potential Colonia Fund applicants during that program year. If unallocated within the Colonia Fund, funds then may be used for other CDBG fund categories to fund eligible projects or activities that assist colonia residents. Remaining unallocated funds are then subject to the procedures used to allocate Deobligated Funds.

4. DR/UN Funds - funds from the withdrawal of a DR/UN award remain available to potential DR/UN Fund applicants during that program year. If unallocated within the DR/UN Fund, the funds are subject to the procedures used to allocate Deobligated Funds.

5. The STEP Fund - funds from the withdrawal of a STEP award will be made available in the next round of STEP competition following the withdrawal date in the same program year. If the withdrawn award was made in the last of the two competitions in a program year, the funds would go to the next highest scoring applicant in the same STEP competition. If there are no unfunded STEP applicants, then the funds would be available for other CDBG fund categories. Any unallocated STEP funds are subject to the procedures used to allocate Deobligated Funds.

6. The TCF – funds from the withdrawal of a Main Street or Downtown Revitalization award shall be offered to the next highest ranked application that was not recommended to receive an award due to depletion the program’s allocation. Funds from the withdrawal of a Real Estate and Infrastructure award shall be made available in the next monthly round of competition. Any unallocated TCF funds are then subject to the procedures used to allocate Deobligated Funds.

ADDITIONAL DETAIL ON METHOD OF DISTRIBUTION 2015 ACTION PLAN - PROGRAM INCOME

Program Income

Program income is defined as gross income received by a state, a unit of general local government, or a subrecipient of a unit of general local government that was generated from the use of CDBG funds. When program income is generated by an activity that is only partially funded with CDBG funds, the income shall be prorated to reflect the percentage of CDBG funds used. Any remaining program income must be returned to the State.

The State may use up to the maximum allowable percentage of the amount recaptured and reportable to HUD each year for administrative expenses under the CDBG Program. This amount will be matched by the State on a dollar-for-dollar basis.

TCF and Revolving Loan Fund ("RLF") Program Income

Funds retained in any existing local RLF must be committed within three years of the original CDBG contract programmatic close date. At least one eligible loan/award from the local RLF must be made every three years. Every award from the RLF must be used to fund the same type of activity from which such income was derived. A local RLF may retain a cash balance not greater than 33% of its total cash and outstanding loan balance. All activities funded with RLF funds must comply with CDBG regulations and rules and guidelines. If a local government does not comply with the RLF requirements, all program income retained in the local RLF and any future program income received from the proceeds of the RLF must be returned to the State.

To the extent there are eligible applications, program income derived from the TCF real estate projects will be used to fund awards under the TCF. Other available program income shall be allocated based on the methodology used to allocate Deobligated Funds.

Discussion:

The distribution process for 4% HTC Program, 9% HTC Program, HHSP, Housing Trust Fund Program, MMC Program, My First Texas Home Program, NSP PI Program, Section 8 HCV Program, Section 811 PRA Program, and TCAP Loan Repayments can be found in the documents that govern these programs, all available at <http://www.tdhca.state.tx.us/>. The CDBG Colonia Set-Aside Methods of Distribution will be included in Action Plan Section 48, which is specifically about colonias.

Along with selecting appropriate entities to administer funding, the State must ensure that the funding is appropriately spent. For example, in addition to an outcome measure of the number of clients/households supported with HOPWA housing subsidies assistance, AAs routinely monitor Project Sponsors for compliance and performance. DSHS monitors the AAs and annually compiles AAs' and Project Sponsors program progress reports and reviews cumulative data for number of households assisted compared to goals, expenditures, and stability outcomes of households served. More information on CPD Programs monitoring efforts are described in Strategic Plan Section 80, Monitoring.

AP-35 Projects – (Optional)

Introduction:

At the time of submission of the State of Texas 2015-2019 Consolidated Plan, project information will not have been entered in the Annual Action Plan-35 Projects table. Per Consolidated Plan Guidance Released on February 2014, project-level detail for states is not required because the State does not initiate specific projects or activities.

#	Project Name

Table 5 – Project Information

Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

Because no projects have been entered in this section, this section is not applicable. Allocation priorities are discussed in Action Plan Section 25, which also includes meeting special needs. Actions to meeting underserved needs are found in Action Plan Section 85.

AP-38 Project Summary

Project Summary Information

AP-40 Section 108 Loan Guarantee – 91.320(k)(1)(ii)

Will the state help non-entitlement units of general local government to apply for Section 108 loan funds?

No

Available Grant Amounts

Not applicable.

Acceptance process of applications

Not applicable.

AP-45 Community Revitalization Strategies – 91.320(k)(1)(ii)

Will the state allow units of general local government to carry out community revitalization strategies?

Yes

State's Process and Criteria for approving local government revitalization strategies

TDA's CDBG program operates four programs that stimulate job creation/retention activities that primarily benefit LMI persons, prevent/eliminate slum and blight conditions, and support community planning efforts.

The **TCF Real Estate and Infrastructure Development Programs** provides grants and/or loans for Real Estate and Infrastructure Development to create or retain permanent jobs in primarily rural communities and counties.

The **Downtown Revitalization Program** is intended to stimulate economic growth through the funding of public infrastructure improvements to aid in the elimination of slum and blight conditions in the historic downtown areas of rural communities. The program is only available to “non-entitlement” city governments. Non-entitlement cities do not receive direct funding from HUD and typically include cities with a population of less than 50,000. Awarded cities receive funds to make public infrastructure improvements in the designated historic, downtown business district. Projects must meet the national objective of aiding in the elimination of slum and/or blighted conditions identified by city resolution. The improvements must directly support the revitalization of the city's designated downtown area.

The **Main Street Development Program** is intended to stimulate economic growth through the funding of public infrastructure improvements to aid in the elimination of slum and blight conditions in the historic downtown areas of rural communities identified by the Texas Historical Commission as a Main Street Community. The program is only available to “non-entitlement” city governments that are also designated as an official Texas Main Street City by the Texas Historical Commission. Non-entitlement cities do not receive direct funding from HUD and typically include cities with a population of less than 50,000. Awarded cities receive funds to make public infrastructure improvements in the designated Main Street business district. Projects must meet the national objective of aiding in the elimination of slum and/or blighted conditions identified by city resolution. The improvements must directly support the revitalization of the city's designated main street area.

The **Planning and Capacity Building Fund** is a competitive grant program for local public facility and housing planning activities. Localities apply for financial assistance to prepare a “comprehensive plan” or any of its components. Typical activities regard topics such as: Base Mapping, Land Use, Housing, Population, Economic Development and/or Tourism, Central Business District, Street Conditions, Thoroughfares, Parks and Recreation, Water Distribution and Supply, Wastewater Collection and Treatment, Drainage (streets & flood hazard areas), Gas or Electric Systems (if owned by the locality), Community Facilities, Capital Improvements Program, Zoning Ordinance, Subdivision Regulation. Section 105(a) of the Housing and Community Development Act of 1974, as amended, outlines all the generally eligible activities.

AP-48 Method of Distribution for Colonias Set-aside – 91.320(d)&(k)

Distribution Methods

Table 6 - Distribution Methods by State Program for Colonias Set-aside

1. State Program Name:	Colonias Set-Aside: Colonia Economically Distressed Areas Program Legislative Set-Aside
Funding Sources:	CDBG CDBG Colonias Set-aside
Describe the state program addressed by the Method of Distribution.	Colonia Economically Distressed Areas Program ("CEDAP") Legislative Set-Aside fund provides funding to eligible cities and counties to assist colonia residents that cannot afford the cost of service lines, service connections, and plumbing improvements associated with being connected to a TWDB Economically Distressed Area Program or similar water or sewer system improvement project.
Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	<p>The TDA will evaluate the following factors prior to awarding CEDAP funds:</p> <ul style="list-style-type: none"> • The proposed use of the CDBG funds including the eligibility of the proposed activities and the effective use of the funds to provide water or sewer connections/yard lines to water/sewer systems funded through Economically Distressed Area Program or similar program; • The ability of the applicant to utilize the grant funds in a timely manner; • The availability of funds to the applicant for project financing from other sources; • The applicant's past performance on previously awarded CDBG contracts; • Cost per beneficiary; and • Proximity of project site to entitlement cities or metropolitan statistical areas ("MSAs").
If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)	Guidelines, applications and additional program documentation can be found on TDA's website at www.texasagriculture.gov

Describe how resources will be allocated among funding categories.	The allocation is distributed on an as-needed basis.
Describe threshold factors and grant size limits.	Maximum \$500,000/Minimum \$75,000
What are the outcome measures expected as a result of the method of distribution?	Activities Benefiting LMI Persons

2. State Program Name:	Colonias Set-Aside: Colonia Planning and Construction Funds
Funding Sources:	CDBG CDBG Colonias Set-aside
Describe the state program addressed by the Method of Distribution.	<p>The Colonia Planning Fund ("CPF") funds planning activities that either targets a specific colonia(s) (Colonia Area Planning) or that provides a countywide comprehensive plan (Colonia Comprehensive Planning). In order to qualify for the Colonia Area Planning activities, the county applicant must have completed a Colonia Comprehensive Plan that prioritizes problems and colonias for future action. The targeted colonia must be included in the Colonia Comprehensive Plan.</p> <p>The goal of the Colonia Fund Construction ("CFC") fund is to develop viable communities by providing decent housing, viable public infrastructure, and a suitable living environment, principally for persons residing within a community or area that meets the definition of a colonia. An eligible county applicant may submit an application for the following eligible construction activities:</p> <p>Assessments for Public Improvements - The payment of assessments (including any charge made as a condition of obtaining access) levied against properties owned and occupied by persons of low and moderate income to recover the capital cost for a public improvement.</p> <p>Other Improvements - Other activities eligible under 42 USC Section 5305 designed to meet the needs of colonia residents.</p>
Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	<p>Colonia Fund: Construction. The selection criteria for the Colonia Fund: Construction will focus upon the following factors: community distress; percentage of people living in poverty; per capita income; percentage of housing units without complete plumbing; unemployment rate; benefit to LMI persons; project priorities; project design; matching funds; and past performance.</p> <p>Colonia Fund: Planning (Area). The selection criteria for the Colonia Fund: Planning will focus upon the following factors: community distress; percentage of people living in poverty; per capita income; percentage of housing units without complete plumbing; unemployment rate; project design; the severity of need within the colonia area(s) and how clearly the proposed planning effort will remove barriers to the provision of public facilities to the colonia area(s) and result in the development of an implementable strategy to resolve the identified needs; the planning activities proposed in the application; whether each proposed planning activity will be conducted on a colonia-wide basis; the extent to which any</p>

	<p>previous planning efforts for colonia area(s) have been accomplished; the CDBG cost per LMI beneficiary; the availability of funds to the applicant for project financing from other sources; the applicant's past performance on previously awarded CDBG contracts; benefit to LMI persons; and matching funds.</p> <p>Colonia Fund: Planning (Comprehensive). The selection criteria for the Colonia Fund: Planning will focus upon the following factors: community distress; percentage of people living in poverty; per capita income; percentage of housing units without complete plumbing; unemployment rate; project design; the severity of need for the comprehensive colonia planning effort and how effectively the proposed comprehensive planning effort will result in a useful assessment of colonia populations, locations, infrastructure conditions, housing conditions, and the development of short-term and long term strategies to resolve the identified needs; the extent to which any previous planning efforts for colonia area(s) have been accomplished; whether the applicant has provided any local matching funds for the planning or preliminary engineering activities; the applicant's past performance on previously awarded CDBG contracts; and award history (an applicant that has previously received a CDBG comprehensive planning award would receive lower priority for funding).</p>
<p>If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)</p>	<p>Guidelines, applications and additional program documentation can be found on TDA's website at www.texasagriculture.gov.</p>
<p>Describe how resources will be allocated among funding categories.</p>	<p>The State CDBG allocation (6.75%) is allocated to the Colonia Fund. Of the yearly CDBG allocation to the Colonia Construction and Planning Fund, 97.5% of those funds are to award grants through the CFC and 2.5% are to award grants through the CFP. Subsequent to awarding funds, any portion of the CFC allocation that is unable to be awarded (i.e., fund an application in the minimum amount of \$75,000, etc.) may be used to fund additional eligible CFP applications, and conversely, any portion of the CFP allocation that is unable to be awarded may be used to fund additional eligible CFC applications.</p>
<p>Describe threshold factors and grant size limits.</p>	<p>CFC Maximum \$100,000/Minimum \$0</p> <p>CFC Maximum \$500,000/Minimum \$75,000</p>
<p>What are the outcome measures expected as a result of the method of distribution?</p>	<p>Activities Benefiting LMI Persons</p>

3. State Program Name:	Colonias Set-Aside: Colonia SHC Legislative Set-Aside
Funding Sources:	CDBG CDBG Colonias Set-aside
Describe the state program addressed by the Method of Distribution.	Administered by TDHCA and funded through CDBG, the Colonia SHC Program serves colonias along the Texas-Mexico border. Colonia SHCs provide concentrated on-site technical assistance to low- and very low-income individuals and families in a variety of ways including housing, community development activities, infrastructure improvements, outreach and education. Key services include: housing rehabilitation; new construction; surveying and platting; construction skills training; tool library access for self-help construction; housing finance; credit and debt counseling; grant writing; infrastructure construction and access; contract-for-deed conversions; and capital access for mortgages.
Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	Approximately 42,000 residents live in the targeted colonias served by the colonia SHC Program. The SHCs process applications from income eligible households on a first come, first served basis. Eligible households must reside in one of the targeted colonias, which have been preselected by each recipient and county and confirmed by C-RAC. Households must earn less than 80% of AMI.
If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)	Colonia SHCs are limited statutorily and serve seven targeted colonias within their associated participating county. The SHCs and TDHCA's Border Field Offices both conduct outreach activities throughout the contract period to inform colonia residents of program benefits and eligibility criteria and to provide application assistance.
Describe how resources will be allocated among funding categories.	Of the State CDBG allocation, 2.5% is allocated to this fund. Counties that are statutorily designated to participate in the Colonia SHC Program propose which target colonias should receive concentrated attention and through what scope of program activities and funding. Each SHC designs a proposal unique to the needs of a specific community and based on a needs assessment. After a C-RAC, composed of residents from previously participating colonias, reviews and approves the proposals from the counties, the proposals are then reviewed and approved by the TDHCA's Board of Directors for implementation. Resources are allocated based on analysis and input from each community.

<p>Describe threshold factors and grant size limits.</p>	<p>Maximum \$1,000,000/Minimum \$500,000</p> <p>For the colonia SHC, program rules limit the assistance to up to \$1,000,000 per colonia SHC per contract period. Each program activity, such as new construction, rehabilitation, and small repairs for housing, for example, are limited to specific dollar amounts.</p>
<p>What are the outcome measures expected as a result of the method of distribution?</p>	<p>For the Colonia SHC Program, outcomes include: colonia residents assisted, housing units assisted or created, instances of technical assistance provided, and instances of information delivered. In general, this is Activities Benefiting LMI Persons.</p>

4. State Program Name:	Colonias Set-Aside: Colonias to Cities Initiative Program
Funding Sources:	CDBG CDBG Colonias Set-aside
Describe the state program addressed by the Method of Distribution.	The Colonia to Cities Initiative provides funding for basic infrastructure considered necessary for a colonia area to be annexed by an adjoining city. Priority is given to colonias that have received prior CDBG funding. Both the county and city must submit a multi-jurisdictional pre-application for the project that includes a resolution from each jurisdiction. The city's resolution must include a firm commitment to annex the colonia upon completion of the project. Failure to annex the colonia may result in a requirement to repay the CDBG funding to TDA. The maximum amount provided would be \$500,000. (The Colonia Construction component scoring would be used to prioritize funding if needed. CDBG may establish other criteria in the application guidelines.)
Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	
If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria? (CDBG only)	Eligible applicants will be notified if funds become available.
Describe how resources will be allocated among funding categories.	If there are an insufficient number of projects ready for CEDAP funding, the CEDAP funds may be transferred to the Colonias to Cities Initiative.
Describe threshold factors and grant size limits.	Minimum \$0/Maximum \$500,000
What are the outcome measures expected as a result of the method of distribution?	Activities Benefiting LMI Persons

5. State Program Name:	State Mandated Contract for Deed Conversion Set-Aside
Funding Sources:	HOME
Describe the state program addressed by the Method of Distribution.	The 81st Legislature passed Appropriations Rider 6 to TDHCA's appropriation pattern, which requires TDHCA to spend no less than \$4 million for the biennium on contract for deed conversions for families that reside in a colonia and earn 60% or less of the applicable AMI. Furthermore, TDHCA is targeted to convert no less than 200 contracts for deed into traditional notes and deeds of trust by August 31, 2015. The intent of this program is to help colonia residents become property owners by converting their contracts for deed into traditional mortgages. Households served under this initiative must not earn more than 60% of the Area Median Family Income ("AMFI") and the home converted must be their primary residence.
Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	Administrators must meet HOME Program threshold requirements to access funding. Funding is made available to contract for deed administrators on a first-come, first-served basis, in addition to threshold requirements outlined in the State HOME Program Rule, through the Reservation System.
Describe how resources will be allocated among funding categories.	TDHCA sets aside \$2,000,000 for contract for deed conversion activities annually and releases the funds through the reservation system as a method of distribution.
Describe threshold factors and grant size limits.	Applicants must meet the thresholds provided in the NOFA and State HOME Program Rules in effect the year in which they receive their award. Administrators are not awarded a grant following a successful application. Rather funds are awarded on a household by household basis.
What are the outcome measures expected as a result of the method of distribution?	Assistance to households with incomes at or below 60% AMFI.

Discussion:

Texas has the largest number of colonias and the largest colonia population of all the border states. The method of distribution for funds set aside to serve colonias relies on subgrantees along the Texas-Mexico border as well as interagency cooperation between TDHCA, TDA, TWDB, the Office of the Attorney General, and others. The majority of the funding that assists colonias is through infrastructure development, but funds are also available to address housing, community planning, economic revitalization and disaster relief. TDHCA's role in administering colonia funding is limited to the Colonia SHCs (2.5% set-aside of all Texas' CDBG funds) and HOME colonia set-aside. TDHCA has strategically placed Border Field Offices along the Texas-Mexico Border that supports SHC staff with problem solving and training. The Border Field Offices exist to provide local technical assistance directly to both colonia residents and the organizations that serve colonia residents. TDHCA also works in concert with other state agencies on a regular basis—namely TDA and the Texas Secretary of State—to coordinate efforts and exchange information in order enhance service delivery.

The majority of the funding that assists colonias is through the CDBG Program. However, HOME has a specific set-aside for colonias. In addition, ESG and HOPWA may also provide funding in that area, as described in Action Plan Section 30.

AP-50 Geographic Distribution – 91.320(f)

Description of the geographic areas of the state (including areas of low-income and minority concentration) where assistance will be directed

HOME Addresses Geographic Areas for Assistance

TDHCA does not provide priorities for allocation of investment geographically to areas of minority concentration; however, the geographic distribution of HOME funds to minority populations is analyzed annually. TDHCA is statutorily required by the Texas Government Code to provide a comprehensive statement of its activities through the State of Texas Low Income Housing Plan and Annual Report. Part of this document describes the ethnic and racial composition of families and individuals receiving assistance from each housing program.

HOME funds used for multifamily development are typically paired with tax-exempt bond and/or HTC. TDHCA rules that govern the HTC Program include incentives for developments utilizing the competitive 9% HTC in high opportunity areas which are defined as high-income, low-poverty areas and are not typically minority-concentrated, but it also provides incentive to develop in colonias or economically distressed areas. Developments using tax-exempt bond financing and 4% HTCs are more frequently located in qualified census tracts due to federal guidelines that cause these to be more financially viable.

ESG Addresses Geographic Areas for Assistance

Assistance provided by ESG funds will be directed statewide, according to the 12 HUD-designated CoC areas. TDHCA does not provide priorities for allocating investment geographically to areas of minority concentration as described in Section 91.320(d).

HOPWA Addresses Geographic Areas for Assistance

The Texas HOPWA funding allocations are geographically distributed according to the 26 HIV HSDAs. Allocations are based on several factors, including past performance of Project Sponsors and unmet need, with the majority of Texas HOPWA clients (93% in 2013) classified as extremely low and low income. Allocations generally mirror the Ryan White Program allocation formula, which takes into account population of PLWH, HIV incidence, number of PLWH accessing Ryan White services, percent of PLWH eligible for Medicaid and other considerations. The allocations are then adjusted based on unmet need, prior performance and expenditures, geographic-specific data provided by Project Sponsors, and any other relevant factors. Many of these individuals reside in areas of minority concentration and most PLWH are racial and ethnic minorities, so the program allocates funding to meet the needs of PLWH in Texas.

CDBG Addresses Geographic Areas for Assistance

TDA does not provide priorities for allocation of funds geographically to areas of minority concentration as described in Section 91.320(f). CDBG funds are allocated across the state in three ways.

1. The CD Fund assigns a percentage of the annual allocation to each of the 24 Regional COGs, ensuring that each region of the state receives a portion of the funds.
2. The Colonia Fund directs funding to communities within 150 miles of the Texas-Mexico border.
3. All remaining funds are distributed through state-wide competitions without geographic priorities.

For the Colonia SHCs, centers are established along the Texas-Mexico border in Cameron/Willacy, Hidalgo, Starr, Webb, Maverick, Val Verde, and El Paso counties as well as in any other county designated as an economically distressed area. The SHC Program serves approximately 28 colonias in seven border counties, which are comprised of primarily Hispanic households and have concentrations of very low-income households.

Geographic Distribution

Target Area	Percentage of Funds
State of Texas	100

Table 7 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

HOME Addresses Geographic Investments

HOME funds are allocated geographically using a RAF, as described in Strategic Plan Section 10. This process directs funds to areas of the State that demonstrate high need. In addition, HOME funds administered by TDHCA are primarily used in areas that are not Participating Jurisdictions ("PJs") per statute. This results in more HOME funds in smaller communities than in the larger Metropolitan Statistical Areas ("MSAs") that receive HOME funds directly from HUD. The most updated RAF is online at <http://www.tdhca.state.tx.us/housing-center/pubs-plans.htm>.

ESG Addresses Geographic Investments

Assistance provided by ESG funds will be directed statewide, according to the 12 HUD-designated CoC areas. CoC regions are ranked according to the combination of the region's proportionate share of the state's total homeless population, based on the most recent Point-in-Time count submitted to HUD by the CoCs and the region's proportionate share of people living in poverty, based on the most recent 5-year American Community Survey poverty data published by the Census Bureau. For the purposes of distributing funds, the percentage of statewide homeless population is weighted at 75% while the percentage of statewide population in poverty is weighted at 25%

HOPWA Addresses Geographic Investments

At the end of 2012, nearly 73,000 people in Texas were known to have HIV and it is estimated that an additional 17,000 people in Texas are living with HIV but are currently unaware of their status. The number of Texans living with HIV increases each year and in order to meet the needs of low-income PLWH in Texas, many of whom live in areas of minority concentration, the HOPWA funding allocations

are geographically distributed across the State and are allocated based on several factors, including unmet need.

Six cities in Texas have a population of over 500,000 (Austin, Dallas, Fort Worth, El Paso, Houston, and San Antonio), which are in MSAs funded directly from HUD for HOPWA. Although the Texas HOPWA program can operate in any area of the State, the State program serves all counties not covered under the MSAs' jurisdictions, with some overlap of counties between the State and the MSAs. As a result, Texas HOPWA covers all of the rural areas of the State, where many low-income HOPWA clients reside, and funding prioritization is based on areas with greater unmet need for PLWH.

CDBG Addresses Geographic Investments

Texas CDBG Funds for projects under the CD Fund are allocated by formula to 24 regions based on the methodology that HUD uses to allocate CDBG funds to the non-entitlement state programs (21.71% of annual allocation), along with a state formula based on poverty and unemployment (40% of annual allocation). In addition, 12.5% of the annual allocation is allocated to projects under the Colonia Fund categories, which must be expended within 150 miles of the Texas-Mexico border.

For the Colonia SHCs, state legislative mandate designates five centers along the Texas-Mexico border in specific border counties to address the long history of poverty and lack of institutional resources. Two additional counties have been designated as economically distressed areas and also operate centers through the program. These counties collectively have approximately 42,000 colonia residents who may qualify to access center services.

Discussion

Many of the Target Areas available in the Integrated Disbursement and Information System (“IDIS”), HUD’s electronic system in which this Plan has been entered, were too detailed for use at the macro-level; therefore, the State entered the “State of Texas” as a Target Area in Strategic Plan Section 10. Within Texas, each program relies on a formula to distribute funds geographically.

Affordable Housing

AP-55 Affordable Housing – 24 CFR 91.320(g)

Introduction:

Affordable Housing goals for PY 2015 are indicated in the table below for the number of homeless, non-homeless, and special needs households, and for the number of affordable housing units that will be provided by program type, including rental assistance, production of new units, rehabilitation of existing units, utility connections for existing units, or acquisition of existing units. Note that goals entered for ESG are only for Homeless Prevention and Rapid Re-housing. The HOME goals include multifamily and single family activities.

One Year Goals for the Number of Households to be Supported	
Homeless	4,576
Non-Homeless	704
Special-Needs	1,245
Total	6,525

Table 8 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	6,003
The Production of New Units	70
Rehab of Existing Units	412
Acquisition of Existing Units	40
Total	6,525

Table 9 - One Year Goals for Affordable Housing by Support Type

Discussion:

The one year goals for TDHCA's HOME Program include homebuyer assistance with possible rehabilitation for accessibility, TBRA, homeowner rehabilitation assistance, rehabilitation of multifamily units, and construction of single-family and multifamily units.

TDHCA's ESG Program provides Rapid Re-housing assistance to help homeless individuals and households quickly regain stability in housing. Homelessness Prevention and Emergency Shelter outcome indicators are counted as persons, not households, so is not added into the chart above. ESG also provides street outreach, but as this does not directly equate to affordable housing, it is not counted above.

DSHS' HOPWA Program provides STRMU, TBRA, PHP, and Supportive Services to assist low-income HIV-positive clients and their families to establish or maintain affordable, stable housing, reduce the risk of homelessness, and improve access to health care and other services. HOPWA serves PLWH who are 80%

or less of area median income, but a majority of Texas HOPWA clients are under 30% AMI and lack of affordable housing is an ongoing issue. DSHS estimates that the HOPWA program will assist 923 unduplicated, income-eligible clients with housing subsidy assistance.

Currently, Texas CDBG funds primarily support affordable housing through water and sewer infrastructure for housing. The CDBG funding provides a cost savings for housing when used to install water and sewer yard lines and pay impact and connection fees for qualifying residents. Housing rehabilitation projects are prioritized in several fund categories. CDBG funds also help communities study affordable housing conditions, providing data on affordable housing stock and planning tools for expanding affordable housing. CDBG provides approximately 250 utility connections per year, which are not reflected in the chart above, but could prove essential to obtaining or maintaining housing.

Colonia residents are considered “Special Needs” households who are supported through the production, rehab or acquisition of units (no rental assistance). The Colonia SHCs continue to address affordable housing needs in border counties by assisting qualifying colonia residents to improve or maintain a safe, suitable home in suitable areas, with the contribution of the residents’ sweat-equity which is required in all housing activities at the SHC. In addition, the Colonia SHCs provide other development opportunities that support the creation of affordable housing for beneficiaries, such as tool lending, and training in home construction and repair, financial literacy, and homeownership skills.

AP-60 Public Housing - 24 CFR 91.320(j)

Introduction:

TDHCA believes that the future success of PHAs will center on ingenuity in program design, emphasis on resident participation towards economic self-sufficiency, and partnerships with other organizations to address the needs of this population. While TDHCA does not have any direct or indirect jurisdiction over the management or operations of PHAs, it is important to maintain a relationship with these service providers.

Actions planned during the next year to address the needs to public housing

TDHCA, as a small PHA itself, works with other PHAs around the State to port vouchers when necessary. This is especially true for Project Access, a TDHCA program that uses Section 8 vouchers to transition people with disabilities in certain institutions to the community, described fully in Action Plan Section 65. For the Project Access Program, an applicant is issued a voucher from TDHCA. To port the voucher, TDHCA works with the Receiving Public Housing Authority ("RPHA") to transfer the documents and the voucher. The voucher holder is briefed and given an introduction on the RPHAs program rules. At this time, the RPHA can decide to absorb the voucher or bill the Initial PHA ("IPHA"). If the RPHA absorbs the voucher, the RPHA will send notice to the IPHA for documentation. This allows TDHCA to use another HCV for another applicant on the Project Access waiting list. If the RPHA bills the IPHA, the RPHA is required to submit a billing notice within an allotted time to the IPHA so payment can be received. The number of HCVs that were ported from January to August of 2014 was 71. In this way, TDHCA and local PHAs work closely together.

HOME Addresses PHA Needs

TDHCA provides notices of funding availability under the HOME Program to interested parties around the State, including PHAs. Furthermore, staff of PHAs, especially those receiving HOME funds and those with Section 8 Homeownership programs, are targeted by TDHCA's Texas Statewide Homebuyer Education Program for training to provide homebuyer education opportunities and self-sufficiency tools for PHA residents.

In addition, PHAs may also administer HOME TBRA funds, enabling them to provide households with rental assistance and services to increase self-sufficiency.

Regarding HOME Multifamily Development that is also financed with the HTC Program, PHAs are incentivized in the QAP to either provide leverage in developments that they own or to provide financing as evidence of support from Local Political Subdivisions for developments which they do not own.

ESG Addresses PHA Needs

PHA residents are eligible to receive assistance and services from ESG Subrecipients, as long as the assistance does not violate Section 576.105(d) of the ESG rules regarding use of funds with other subsidies. Fostering public housing resident initiatives is not an initiative for which TDHCA provides

funding or that TDHCA tracks for the ESG Program.

HOPWA Addresses PHA Needs

The HOPWA program administered by DSHS does not provide public housing assistance. However, Project Sponsors coordinate closely with local housing authorities for client referrals and to address local housing issues. HOPWA clients who move into public housing are no longer eligible to receive HOPWA housing subsidy assistance but are offered HOPWA Supportive Services as needed for transition and if eligible, may continue to receive services through the Ryan White/State Services program.

CDBG Addresses PHA Needs

The Texas CDBG Program serves public housing areas through various funding categories as residents of PHAs qualify as low- to moderate-income beneficiaries for CDBG projects.

CDBG grant recipients must also comply with local Section 3 policies, including outreach to public housing residents and other qualified Section 3 persons in any new employment, training, or contracting opportunities created during the expenditure of CDBG funding.

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

HOME, ESG, HOPWA, and CDBG are subject to 24 CFR Part 135 which requires that HUD funds invested in housing and community development construction contribute to employment opportunities for low-income persons living in or near the HUD-funded project. These requirements, called Section 3 requirements, are covered at trainings for Subrecipients; persons who may benefit from employment opportunities include PHA residents.

HOME Addresses Public Housing Resident Initiatives

PHAs are eligible to apply to administer HOME funds to provide homebuyer assistance in their areas. PHAs also provide services to increase self-sufficiency, which may include homebuyer counseling services. In addition, TDHCA targets its Texas Statewide Homebuyer Education Program to PHAs, among other groups, which provide homebuyer education training opportunities and self-sufficiency tools for PHA residents.

ESG Addresses Public Housing Resident Initiatives

PHA residents are eligible to receive assistance and services from ESG Subrecipients, as long as the assistance does not violate Section 576.105(d) of the ESG rules regarding use of funds with other subsidies.

HOPWA Addresses Public Housing Resident Initiatives

The HOPWA program administered by DSHS does not provide public housing assistance. However, Project Sponsors coordinate closely with local PHAs for client referrals and to address local housing

issues.

CDBG Addresses Public Housing Resident Initiatives

The CDBG Program serves public housing areas through various funding categories as residents of PHAs qualify as low- to moderate-income beneficiaries for CDBG projects.

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

TDHCA has worked to promote programs that will rehabilitate and bring substandard housing into compliant condition and will develop additional affordable housing units. For example, most of the PHA applications for HTCs are for rehabilitation and the applications for new construction usually include a demolition of the existing units. TDHCA also offers a variety of funding sources for assistance. Most PHAs that apply are usually from larger Metropolitan Statistical Areas, which are PJs and not eligible to receive HOME funding through TDHCA. Consistent with fair housing objectives, TDHCA seeks ways to accomplish these activities in a manner that seeks to place PHA units in areas of greater opportunity and areas that do not involve unacceptable site and area features.

In one specific case, TDHCA absorbed vouchers from a PHA which was having difficulties, the Navasota Housing Authority. HUD identified that the Navasota Housing Authority was administering vouchers outside of their jurisdiction. Therefore, the Navasota Housing Authority contacted TDHCA to discuss the possibilities of absorbing these vouchers. During a series of meetings with HUD staff and the PHAs, discussion resulted in a scheduled on-site visit. Ultimately, the Navasota Housing Authority transferred additional funds to TDHCA and HUD reassigned the files' PHA code.

To expand its work with PHAs, TDHCA has developed a relationship with the Texas Housing Association and the Texas chapter of the National Association of Housing and Redevelopment Officials ("NAHRO"), which serve the PHAs of Texas. Whenever possible, the State will communicate to PHAs the importance of serving special needs populations.

Discussion:

To address PHA needs, TDHCA has designated PHAs as eligible entities for its programs, such as the HTC Program, HOME Program, and ESG Program. PHAs have successfully administered HTC funds to rehabilitate or develop affordable rental housing. The PHA needs to submit an application and be awarded in order to access funding.

There are also federal sources available for PHAs that can be paired with HOME. Also through HUDs Rental Assistance Demonstration ("RAD") Program, PHAs can use public housing operating subsidies along with HTC Program once the older PHA units are demolished and replaced with new housing. Because most PHAs using RAD are located in PJs, TDHCA does not anticipate using its HOME funds in conjunction with RAD consistent with its restrictions on HOME fund use in participating jurisdictions.

AP-65 Homeless and Other Special Needs Activities – 91.320(h)

Introduction

TDHCA will address requirements in 24 CFR §91.320 by utilizing funds to reduce and end homelessness by having each ESG fund to be coordinated with the lead agency of the CoC, which provides services and follows a centralized or coordinated assessment process; has written policies and procedures in place as described by §578.7(a)(8) and (9); and follows a written standard to provide street outreach, emergency shelter, rapid re-housing, and homelessness prevention assistance. To assist low-income individuals and families to avoid becoming homeless, especially those discharged from publicly-funded institutions and systems of care, or those receiving assistance from public and private agencies that address housing, health, social services, employment, education, or youth needs, TDHCA will require each Subrecipient to set performance targets that will be part of their contract and extended to each of the local organizations that the Subrecipient funds. A Subrecipient must address the housing and supportive service needs of individuals assisted with ESG funds in its plan.

In addition, ESG will work in tandem with other programs that help to transition persons out of institutions, such as the HOPWA Program, Section 811 PRA Program, Project Access Program, Money Follows the Person Program, and the Home and Community-Based Services - Adult Mental Health Program. The HHSCC also works to enhance coordination between housing and service agencies to assist persons transitioning from institutions into community-based settings.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including: Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

The Texas ESG Program provides funds to service providers for outreach to unsheltered homeless persons in order to connect them to emergency shelter, housing, or critical services; and to provide urgent, non-facility-based care to unsheltered homeless people who are unwilling or unable to access emergency shelter, housing, or other appropriate facilities. Of critical importance is assisting the unsheltered homeless with emergency shelter or other placement. One of the possible performance measures that Subrecipients will be measured against is their ability to help homeless persons move into permanent housing, achieve higher incomes and gain more non-cash benefits. To ensure long-term housing stability, clients will be required to meet with a case manager not less than once per month (with exceptions pursuant to the VAWA and the Family Violence Prevention and Services Act ("FVPSA")). Subrecipients will also be required to develop a plan to assist program participants to retain permanent housing after the ESG assistance ends.

Addressing the emergency shelter and transitional housing needs of homeless persons

The ESG program helps the unsheltered homeless and homeless individuals and families residing in emergency shelter and those fleeing domestic violence to return to stable housing conditions by providing support to organizations that provide emergency services, shelter, and transitional housing to homeless persons and households. One of the possible performance measures that Subrecipients will be measured against is their ability to help individuals and families move out of emergency shelter and transitional housing and into permanent housing, achieve higher incomes and gain more non-cash

benefits. To ensure long-term housing stability, clients will be required to meet with a case manager not less than once per month (with exceptions pursuant to the VAWA and the FVPSA). Subrecipients will also be required to develop a plan to assist program participants to retain permanent housing after the ESG assistance ends.

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

The ESG Program has broadened the activities that can be used to help low-income families and individuals avoid becoming homeless and to rapidly re-house persons or families that experience homelessness. ESG funds can be used for short-term and medium-term rental assistance, rental application fees, security deposits, utility deposits, utility payments, and moving costs for homeless individuals or persons at risk of homelessness. Funds can also be used for housing service costs related to housing search and placement, housing stability case management, mediation, legal services, and credit repair. ESG funds can also be used to pay for essential service costs including case management, child care, education services, employment assistance and job training, outpatient health services, legal services, life skills training, mental health services, substance abuse treatment services, transportation, and costs related to serving special populations.

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

In addition to homelessness prevention, ESG funds provided to CoCs actively promote coordination with community providers and integration with mainstream services to marshal available resources. One performance measure for subrecipients may be their ability to help increase non-cash benefits for program participants; the subrecipients would help program participants obtain non-ESG resources, such as veterans benefits or food stamps.

Individuals eligible for the State's HOPWA Program who are exiting from an institution receive a comprehensive housing plan and linkage and referrals to health professionals from a case manager. The State HOPWA Program provides TBRA, which can be used to transition persons from institutions into stable housing. Some project sponsors also provide rental deposits and application fees.

Other programs included in this Plan also address persons transitioning from institutions. For example, TDHCA received an award for \$12 million for the Section 811 PRA Program. The program will help extremely low-income individuals with disabilities and their families by providing approximately 360 new integrated supportive housing units in seven areas of the state. Members of the target population include individuals transitioning out of institutions; people with severe mental illness; and youth with

disabilities transitioning out of the state's foster care system. Individuals in the Section 811 PRA Target Population are eligible for assistance from public agencies, are Medicaid-eligible, and could be at-risk of housing instability and/or homelessness.

Coordination between housing and the Health and Human Services ("HHS") agencies is exemplified by the Project Access and Money Follows the Person programs. Project Access uses Section 8 Housing Choice Vouchers administered by TDHCA to assist low-income persons with disabilities transition from nursing homes and Intermediate Care Facilities ("ICFs") to the community, while using the Money Follows the Person Program to provide services by HHS agencies. Since it began in 2002, the TDHCA Governing Board approved changes to Project Access based on input from advocates and the HHS agencies, such as incremental increases to vouchers from 35 to 140 and creation of a pilot program with DSHS for persons with disabilities transitioning out of State Psychiatric Hospitals.

In addition, TDHCA offers the use of TBRA to individuals on the Project Access Wait List, allowing him/her to live in the community until she/he can use Project Access. TDHCA conducted outreach and technical assistance to Department of Aging and Disability Services ("DADS") Relocation Specialists and HOME TBRA Administrators to help them serve individuals on the wait list.

To further address the needs of individuals transitioning from institutions, HHSCC, codified in Texas Government Code, Chapter 2306, Subchapter NN, seeks to increase coordination of housing and health services, by supporting agencies to pursue funding, such as Relocation Contractor services for people with behavioral health challenges and Intellectual and Developmental Disabilities; Medicaid waiver programs; vouchers from PHAs for people with disabilities and aging Texans; housing resources from the Texas Department of Criminal Justice for people with criminal histories transitioning to the community; and DSHS' rental assistance program.

HHSCC also encourages the coordination of TDHCA with DSHS for DSHS' new Home and Community-Based Services: Adult Mental Health Program. This program will serve individuals with Serious Mental Illness who have long-term or multiple stays in the State's Mental Health Facilities.

Discussion

The Texas ESG Program is designed to assist, assess and, where possible, shelter the unsheltered homeless; to quickly re-house persons who have become homeless and provide support to help them maintain housing; and to provide support that helps persons at risk of becoming homeless maintain their current housing. Other special needs populations are described in Action Plan Section 25.

One public comment on the draft Plan noted that housing needed to work with other community services and supports, such as health care, location of jobs with good incomes, and education opportunities, to have a successful community. While the discussion above focuses on special needs populations, the commenter notes that when housing and services work together the entire community benefits.

AP-70 HOPWA Goals – 91.320(k)(4)

One year goals for the number of households to be provided housing through the use of HOPWA for:	
Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family	470
Tenant-based rental assistance	440
Units provided in permanent housing facilities developed, leased, or operated with HOPWA funds	0
Units provided in transitional short-term housing facilities developed, leased, or operated with HOPWA funds	0
Total	910

AP-75 Barriers to affordable housing – 91.320(i)

Introduction:

The State submitted the Phase 2 of State of Texas Plan for Fair Housing Choice: Analysis of Impediments ("AI"), to HUD on November 8, 2013. This document describes state and local regulatory and land use barriers in detail. It may be accessed at <http://www.tdhca.state.tx.us/housing-center/fair-housing>. The AI included several suggestions on countering negative effects of public policy as it concerned two areas – land use and zoning and Not-In-My-Backyard Syndrome ("NIMBYism"). Suggestions applied to local governments as well as the state; the state is planning the following actions in response to these recommendations.

When a developer proposes an affordable housing development, state statutes require that the developer notify certain local community organizations and state and local officials. The required public notification process provides notice to persons, including those who may oppose affordable housing.

Given the climate surrounding the development of affordable housing and the likelihood of encountering NIMBY attitudes, developers may avoid proposing affordable developments in areas where they believe such reactions are likely because of the potentially significant increased costs of addressing NIMBYism and the increased likelihood of opposition thwarting their ultimate success. In turn, developers may choose to propose affordable multifamily developments in areas with fewer perceived barriers to development, often areas with lower median household income and concentrations of affordable housing where there is often a strong local desire for development of affordable housing. However, recent changes in the scoring of the State's HTC Program would mean developments in higher poverty areas would not score as well in the program's competitive environment.

In general, Texas residents share similar values about housing, regardless of their race, ethnicity, income or disability. Most of the value statement questions in a recent survey of Texas residents meant to detect NIMBYism received low ratings; especially "I prefer to live near people who are of my race or ethnicity." In fact, the value statement "I prefer to live in a neighborhood with many different types of people" had the second highest rating across the groups surveyed. (BBC Research and Consulting, 2012, Section III, Page 21)

The State is currently developing best practices guidance related to zoning and land use regulations, policies, and practices that will further fair housing choice. The State plans to release best practices to the public through its new Fair Housing website; the website will include areas specific to Real Estate Professionals, Developers, and Administrators, as well as Local Governments and Elected Officials.

Because cases of NIMBYism can be difficult to track (e.g., there is no database of NIMBY activities) it is hard to measure where NIMBYism occurs most often. The cases of NIMBYism most often associated with proposed HTC developments. Although not exclusive to these areas, NIMBYism appears anecdotally to be more likely to be a concern in areas with socioeconomic and housing homogeneity. To assist the State in gathering data on how elected officials, communities, and local governments are impacted by NIMBYism sentiments and to help the State in countering NIMBY messaging, TDHCA routinely outsources for studies, market analyses, and special projects with universities and private

consulting firms. Guidance and resources to support affordable housing will be provided through TDHCA's Fair Housing website, along with a new Fair Housing listserv and community events calendar, and a Speaker's Bureau that will be able to discuss and dialogue on this and other Fair Housing topics.

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

To address concerns voiced by the public, TDHCA acts as an information resource for affordable housing studies and information. One recent project was with the University of Houston and will result in materials that can be used by elected officials and local governments that are considering a variety of actions related to affordable housing. Another project between TDHCA (including HHSC) and the University of Texas will result in a Fair Housing public service message campaign with videos in support of affordable housing, fair housing rights, and Service-Enriched Housing.

To increase outreach at events, the State will attend a panel discussion called Building Stronger Communities through Expanded Housing Choice during an October conference of the Texas Chapter of the American Planning Association. The event will include statewide participants from communities and regional planning bodies. The State also plans to network with the Texas Municipal League and the Texas Association of Regional Councils.

The Texas Workforce Commission Civil Rights Division ("CRD") received a two-year grant of Partnership Funds for an outreach campaign. Groundwork was laid in January of 2014 and an outreach campaign coordinator was hired on July 1, 2014. CRD is targeting Midland, Odessa, Laredo, and Victoria, as well as small cities and towns surrounding these "oil and gas boom" areas. This campaign will include face-to-face activities as well as advertising/public service announcements in media sources to educate people in these areas on their Fair Housing rights and responsibilities.

TDHCA is also currently engaged in reviewing all guiding documents, rules, and practices internally to determine if known barriers or impediments to furthering fair housing choice can be further accomplished by making changes. The Fair Housing Team held interviews with Division Directors during May and June, 2014. Initial recommendations and actions were noted for each program as well as a list of 15 cross-Divisional recommendations that included items such as improved Affirmative Marketing Rules, improved Language Assistance Plan guidance, a better internal mechanism for Fair Housing training, Fair Housing Team reviews of rule changes and NOFA documents, etc. The Fair Housing Team and TDHCA will be making a concerted effort to review and move forward on key recommendations and to increase staff education to ensure that all programs are providing best practices guidance to recipients and the general public.

Also, in the Market Analysis Section 40, a policy was identified which affects the return on investment of affordable housing funds. This policy involves pressure from local governments, nonprofits and other subrecipients to use grants instead of loans, which results in a long-term depletion of affordable housing funding, since grants are not repaid. However, because of the cuts to HOME funding from HUD beginning in 2013, the affordable housing community may now be more receptive to the transition to loans. In fact, the CHDO activities were funded with 0% interest loans in 2014 and consultations with developers resulted in positive comments about the replenishment of the HOME CHDO funds. One

developer recommended considering the implementation of loans for all homebuyer assistance (which is currently a mix of grants and deferred, forgivable loans) or homeowner rehabilitation. However, other consultations strongly opposed loans for homeowner rehabilitation because some program providers believe the population that uses rehabilitation are so severely low income that the homeowners would be far less likely to take on the liability of a loan and the burden of loan payments, and would rather live in a substandard property than take on those risks. TDHCA will continue to explore the idea of loans for HOME activities, when feasible.

Discussion:

A current collaboration between federal funding recipients known as the Texas State Fair Housing Workgroup began in May, 2014. This workgroup will assist State agencies adopt a uniform stance on Fair Housing issues and provide streamlined direction to essential Fair Housing information and best practices. To date, the workgroup has looked at sharing language assistance contracts, has generated ideas on streamlining Fair Housing discrimination complaint information and resources, and has served as a vehicle for comparing internal Fair Housing tracking and record keeping measures.

The Fair Housing Team at TDHCA has taken a leadership role in these meetings as directed under the 2013 Analysis of Impediments; the Fair Housing Team has shared both its Fair Housing Tracking Database, which is an internal Microsoft Access database it has designed to track action steps under the Phase 2 AI, and its new Fair Housing website section, which TDHCA believes will become one of the leading Fair Housing website resources for the state. The Fair Housing Team will also soon be debuting and sharing its demographic database, which is being created with the long-range goal of standardizing demographics collected in each TDHCA program area and analyzing these demographics to identify trends; make policy recommendations; and map service areas. As its initial test, this database will auto-generate an Excel spreadsheet that analyzes TDHCA multifamily property demographics against census data demographics by census tract, county, and MSA to determine which populations are under-represented or over-represented based on the definition of minority concentration from HUD. The spreadsheet will debut with the revised Multifamily and new Single Family Affirmative Marketing Rules. The spreadsheet will assist Multifamily Owners in determining which populations are considered least likely to apply and should be included in an Affirmative Marketing Plan. The short-term effect should be an increase in understanding and compliance with the Affirmative Marketing Rule of TDHCA. The long-term effect should be an improved ability to determine which areas are under or over served and an ability to present such information objectively to stakeholders and local governments.

The Fair Housing Team has 36 action steps on which it is moving forward, and is able to produce metrics on its momentum under the AI through its Fair Housing Tracking Database. In addition to logged action steps, the database also includes outreach and daily task logs and makes use of quick queries that it places into report-style templates based on a date range. The database collects action steps based on the four phases of project management planning (e.g., Plan, Review, Implement, and Evaluate) which lead staff to consider even at the planning stage how the step will be evaluated. This has resulted in a metrics-focused planning effort that will continue to guide future initiatives. The Fair Housing Team presented its first report to the TDHCA Board on these and other current goals at its July 31, 2014, meeting.

Finally, the State, through its Fair Housing Team, plans to create a new Fair Housing website section, which will include fair housing information for a variety of audiences (renters and homebuyers, owners

and administrators, real estate agents, and local governments and elected officials) and will include fair housing toolkits and resources, links to a new Fair Housing email list and community events calendar, and a consumer survey. A portion of the available toolkits will be tailored to elected officials and local governments in an effort to encourage best practices in zoning and land use and addressing community concerns. Through this education and outreach, the State is hoping to make its best practices guidance widely known and to integrate such guidance with other state resource information.

AP-80 Colonias Actions – 91.320(j)

Introduction:

Among the border states of California, Arizona, New Mexico, and Texas, Texas has the largest number of colonias (approximately 1,825) and the largest colonia population (approximately 369,000 individuals) (Office of the Texas Secretary of State, 2010). Texas' colonias lie outside of city limits in the rural areas of their respective counties, where few to no local building codes exist to protect the households that seek affordable and sanitary housing solutions. Egregious housing conditions persist while residents also endure substandard infrastructure, inadequate potable water and waste water systems, and a host of public health, environmental and employment risks.

As discussed in Action Plan Section 48, the majority of the funding that assists colonias is through the CDBG Program, which funds both state agencies working to develop infrastructure and water services, as well as subgrantees at the local government level who work in concert with nonprofit service providers for housing, community affairs, and economic development. The OCI focuses on Texas colonias because colonias are economically distressed areas home to low- and very low-income households who contend with inadequate housing and scarce tangible resources. Colonias have proliferated along the U.S.-Mexico border. The HOME Program also has a specific set-aside for the development of housing opportunities in the colonias.

Actions planned to address obstacles to meeting underserved needs

The State dedicates 12.5 percent of CDBG funds annually for colonia areas, and additional funds are also awarded for colonia projects through other competitive fund categories. Basic human needs, including water and sewer infrastructure and housing rehabilitation, are prioritized for colonia set-aside funding, with a particular emphasis on connecting colonia households to safe and sanitary public utilities. Colonia planning funds are available to research and document characteristics and needs for colonia communities.

The Colonia SHCs experience the obstacle of wavering capacity to meet the needs of extremely under resourced colonia residents. The typical challenges that nonprofits face, such as high-turnover, lack of succession planning, lack of long-term funding opportunities, limited access to high quality training, and limited access to continuing education resources, are all exacerbated for subgrantees serving border colonias. In response, TDHCA has strategically placed Border Field Offices along the Texas-Mexico border that support SHC staff with problem solving and training. The Border Field Offices exist to provide local technical assistance directly to both colonia residents and the organizations that serve colonia residents.

Colonia residents may also receive benefit through the HOME Program, which provides rental assistance, rehabilitation or reconstruction of owner-occupied units with or without refinancing, down payment and closing cost assistance with optional rehabilitation for the acquisition of affordable single family housing, single family and multifamily development, and rental housing preservation of existing affordable or subsidized developments.

Actions the state plans to take to reduce the number of poverty-level families

Please refer to Strategic Plan Section 75 for how the TDHCA's Colonia SHCs provides one-stop-shop opportunities in targeted colonias along the Texas-Mexico border.

Actions the state plans to take to develop the institutional structure

Please refer to Strategic Plan Section 75 for the state's interagency strategy to monitor colonia improvements and facilitate information exchange among the agencies that address colonia issues.

Specific actions the state plans to take to enhance coordination between public and private house and social service agencies

In addition to the cooperation among various state agencies that help to support and develop colonias, TDHCA has established three strategically-placed Border Field Offices along the Texas-Mexico border, where the vast majority of colonias are situated. The Border Field Officers readily support administrators, disseminate funding information, and problem solve with administrators and colonia residents. This often requires facilitating communication with other service agencies, the private sector (such as colonia land owners, title companies, lenders), and other government agencies. Locally placed Border Field Officers increase the efficiency with which TDHCA can anticipate solutions and eventually builds institutional knowledge in the community.

In addition, TDA field representatives are available to provide general information on potential resources to communities and residents.

Discussion:

TDHCA and TDA's participation in the Texas Secretary of State's interagency workgroup on colonia issues helps keep both departments abreast of other state agencies' actions in infrastructure, public health and other activities. In the event that one agency's process could be counterproductive to the efforts of either department, it is in this forum that mitigation and problem solving can take place.

AP-85 Other Actions – 91.320(j)

Introduction:

The actions listed below are Other Actions taken by TDHCA, TDA, and DSHS to meet the requirements of §91.320(j). Other Actions include Meeting Underserved Needs, Fostering and Maintaining Affordable Housing, Lead-Based Paint Hazard Mitigation, Reducing Poverty-Level Households, Developing Institutional Structure, and Coordination of Housing and Services. The HOME, ESG, HOPWA, and CDBG programs address the other actions in concert with other federal, state, and local sources.

Actions planned to address obstacles to meeting underserved needs

HOME Addresses Underserved Needs

Obstacles to meeting underserved needs with HOME funds, particularly multifamily activities, include NIMBYism, a lack of understanding of federal requirements surrounding the use of HOME funds, and staff observation that program administrators may have more strict tenant or household selection criteria than other locally-run programs. TDHCA works to overcome these obstacles by educating developers and the communities where affordable housing is being proposed, as well as by offering HOME funds as grants or low-interest loans, with rates as low as 0%.

ESG Addresses Underserved Needs

Lack of facilities and services for homeless persons in rural areas is ESG's greatest underserved need. To help meet this need, TDHCA has used Community Services Block Grant discretionary funds to provide training and technical support to organizations in the Balance of State CoC. Shelters in the Balance of State CoC have limited funds for operations and maintenance, with little access to federal funds which often require substantial organizational capacity less common in smaller organizations. ESG and TDHCA's HHSP, which is state-funded only in some urban areas, may supplement federal funds in operational support.

HOPWA Addresses Underserved Needs

Some significant obstacles to addressing underserved needs are PLWH inability to obtain or maintain medical insurance, maintain income, and especially obtain employment, are partially due to a difficult economy in conjunction with rising costs of living (rent, deposits, utilities, food, transportation, etc.), high unemployment, no access to health insurance and/or decreased access to other affordable housing such as the HCV program. The inability to access HCVs is due to long or closed waiting lists, and in some cases, client non-compliance and ineligibility due to undocumented immigrant status.

DSHS' HOPWA program helps meet the needs of this underserved population throughout the State by providing essential housing and utilities assistance as part of a comprehensive medical and supportive services system. As a result, PLWH and their families are able to maintain safe and affordable housing, reduce their risk of homelessness, and access medical care and supportive services. DSHS will reallocate funding to address changing needs to maximize and target HOPWA funding to HSDAs that are in greatest need.

CDBG Addresses Underserved Needs

TDA encourages projects addressing underserved community development needs. In PY 2014 CDBG funds will be available through five different grant categories to provide water or sewer services on private property for low- and moderate-income households by installing yard lines and paying impact and connection fees. Regional competition for funding allows each area of the state to determine its highest priority needs, which may vary from first-time water service to drought relief to drainage projects.

Since the first legislative reforms in the 1990s, service providers in colonias have made gains in their capacity to address colonia issues, but unmet needs still exist and the Texas-Mexico border population growth is still increasing. OCI's main obstacle in addressing colonia housing needs is the varying capacities of subrecipients to administer assistance. TDHCA has established Border Field Offices along the Texas-Mexico border to readily provide technical assistance and on-going training to organizations and local governments that use TDHCA's CDBG funding.

Actions planned to foster and maintain affordable housing

HOME Addresses Affordable Housing

The HOME Program provides grant funds, deferred forgivable loans, and repayable loans to households or developments assisted by or through entities including units of local government, public organizations, nonprofit and for-profit organizations, CHDOs and PHAs. These funds are primarily used to foster and maintain affordable housing by providing rental assistance, rehabilitation or reconstruction of owner-occupied housing units with or without refinancing, down payment and closing cost assistance with optional rehabilitation for the acquisition of affordable single family housing, single family development and funding for rental housing preservation of existing affordable or subsidized developments. HOME funds may also be used in conjunction with the HTC Program or Bond Program to construct or rehabilitate affordable rental housing.

In addition, credits awarded through the HTC program can be layered with awarded funds from the HOME Multifamily Development program. When more than one source of funds is used in an affordable housing project, the State is able to provide more units of affordable housing than with one funding source alone.

ESG Addresses Affordable Housing

While TDHCA encourages the use of ESG funds to provide affordable transitional housing, the majority of funds are utilized to provide emergency shelter. Fostering affordable housing is not an initiative for which TDHCA provides funding or that TDHCA monitors in relation to the ESG Program.

HOPWA Addresses Affordable Housing

The cost of living continues to rise (increases in rent, utilities, application fees, and security deposits) while clients' income does not change, may decrease, or clients have no income. HOPWA makes housing more affordable for low-income clients so they can maintain housing, adhere to medical treatment, and work towards a healthier outcome. Project Sponsors will address long-term goals with the clients to help

them establish a financial plan that can assist them in maintaining their housing. Affordable housing needs are high among PLWH. DSHS will continue to update funding allocations to address the changing needs of local communities and to maximize and target HOPWA funding to HSDAs in greatest need. DSHS will consider a variety of factors including but not exclusive to HIV/AIDS morbidity, poverty level, housing costs and needs, and program waitlists and expenditures. Furthermore, funds are reallocated between HOPWA activities within HSDAs to meet changing needs during the project year.

CDBG Addresses Affordable Housing

Currently, CDBG funds primarily support affordable housing through water and sewer infrastructure for housing. The CDBG funding provides a cost savings for housing when used to install water and sewer yard lines and pay impact and connection fees for qualifying residents.

Housing rehabilitation projects are prioritized in several fund categories, and TDA encourages each region to set aside a percentage of the regional allocation for housing rehabilitation projects.

CDBG helps communities study affordable housing conditions, providing data on affordable housing stock and planning tools for expanding affordable housing. The Colonia SHCs continue to address affordable housing needs in border counties by assisting qualifying colonia residents to improve or maintain a safe, suitable home in suitable areas.

The OCI serves as a liaison to the Colonia SHCs to assist with securing funding and carrying out activities, such as low-interest mortgages, grants for self-help programs, revolving loan funds for septic tanks, and tool lending.

Actions planned to reduce lead-based paint hazards

HOME Addresses Lead-based Paint

The HOME Program requires lead screening in housing built before 1978 for all HOME eligible activities in accordance with 24 CFR §92.355 and 24 CFR Part 35, subparts A, B, J, K, M, and R. Furthermore, single-family and multifamily development activities in HOME increase the access to lead-based-paint-free housing through the construction of new housing or reconstruction of an existing housing unit. There is significant training, technical assistance, and oversight of this requirement on each activity funded under the HOME Program.

ESG Addresses Lead-based Paint

For ESG, TDHCA requires Subrecipients to evaluate and reduce lead-based paint hazards as part of its habitability review. During the annual contract implementation training, TDHCA will provide ESG Subrecipients with information related to lead-based paint regulations and TDHCA's requirements related to such. TDHCA will require ESG-funded Subrecipients to determine if a housing unit was built prior to 1978, for households seeking ESG funded rent or rent deposit assistance whose household has a family member(s) six year of age or younger. If the housing unit is built prior to 1978, the ESG Subrecipient will notify the household of the hazards of lead-based paint.

ESG Subrecipients utilizing ESG funds for renovation, rehabilitation or conversion must comply with the

Lead-Based Paint Poisoning and Prevention Act and the Residential Lead-Based Paint Hazard Reduction Act of 1992. Through renovation, rehabilitation or conversion, ESG increases access to shelter without lead-based paint hazards. TDHCA evaluates, tracks, and reduces lead-based hazards for conversion, renovation, leasing or rehabilitation projects.

HOPWA Addresses Lead-Based Paint

HUD requires that Project Sponsors give all HOPWA clients utilizing homes built before 1978 the pamphlet entitled, "Protect Your Family from Lead in Your Home" during the intake process. The client's case record must include documentation that a copy of the pamphlet was given to the client and the case manager must make a certification regarding lead-based paint that includes actions and remedies if a child under age six will reside at the property.

CDBG Addresses Lead-Based Paint

Lead-based paint mitigation is an activity eligible under housing rehabilitation that is funded under the CPF, CFC, and Community Development Funds. Each contract awarded requires the sub-grantee to conform to Section 302 of the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. 4831(b)) and procedures established by the TxCDBG in response to the Act.

Actions planned to reduce the number of poverty-level families

HOME Addresses Poverty-Level Households

Through the HOME TBRA Program, TDHCA assists households with rental subsidy and security and utility deposit assistance for an initial term not to exceed 24 months. As a condition to receiving rental assistance, households must participate in a self-sufficiency program, which can include job training, General Education Development ("GED") classes, or drug dependency classes. The HOME Program enables households to receive rental assistance while participating in programs that will enable them to improve employment options and increase their economic independence and self-sufficiency. Additionally, TDHCA allocates funding toward the rehabilitation and construction of affordable housing, incentivizing units to assist very low-income households, and assists very low-income households along the international border of Texas and Mexico by promoting the conversion of contract for deed arrangements to traditional mortgages.

ESG Addresses Poverty-Level Households

The ESG Program funds activities that provide shelter and essential services for homeless persons, as well as intervention services for persons threatened with homelessness. Essential services for homeless persons include medical and psychological counseling, employment counseling, substance abuse treatment, transportation, and other services. While TDHCA supports the use of ESG funds to help ESG clients lift themselves above the poverty line, it is not a specific initiative for which TDHCA earmarks ESG funding or that TDHCA monitors for the ESG Program.

For individuals threatened with homelessness, homelessness prevention funds can be used for short-term subsidies to defray rent and utility arrearages for households receiving late notices, and security deposits.

HOPWA Addresses Poverty-Level Households

The DSHS HOPWA Program serves HIV-positive persons based on income eligibility criteria of no more than 80% of AMI with adjustments for family and household size, as determined by HUD income limits. With varying poverty levels and housing needs in each HSDA across the State, funds are allocated and reallocated throughout the program year to maximize and target HOPWA resources to those with the most need. While many HOPWA clients assisted may be at poverty-level, this is not a requirement under 24 CFR §574.3.

CDBG Addresses Poverty-Level Households

A substantial majority of TxCDBG funds, over 95% in 2013, are awarded to “principally benefit low and moderate income persons.” In addition, the formula used to distribute CD funds among regions includes a variable for poverty to target funding to the greatest need. CDBG economic development funds create and retain jobs through assistance to businesses. LMI persons access these jobs, which may include training, fringe benefits, opportunities for promotion, and services such as child care.

Actions planned to develop institutional structure

HOME Addresses Institutional Structure

The HOME Program encourages partnerships in order to improve the provision of affordable housing. Organizations receiving Homebuyer Assistance funds are required to provide homebuyer education classes to households directly, or coordinate with a local organization that will provide the education. In addition, organizations receiving TBRA funds must provide self-sufficiency services directly, or coordinate with a local organization that will provide the services. Finally, partnerships with CHDOs and nonprofit and private-sector organizations facilitate the development of quality rental housing developments and assist in the rehabilitation or reconstruction of owner-occupied housing.

ESG Addresses Institutional Structure

TDHCA encourages ESG subrecipients to coordinate services with housing and other service agencies. Likewise, the CoCs funded with ESG funds are required to coordinate services and their local funded organizations to provide services as part of the local CoC. While ESG believes its system of funding applications that apply to a statewide NOFA is an effective system, ESG also believes that its move to fund the CoCs directly advances program goals of local coordination and cooperation within CoCs. TDHCA reviews ESG subrecipients' coordination efforts during on-site and desk monitoring. A map of local CoCs can be found online at: <http://www.thn.org/continuums/>.

HOPWA Addresses Institutional Structure

DSHS contracts with seven AAs, which contract directly with Project Sponsors serving all 26 HSDAs in the State to administer the HOPWA program under DSHS oversight. AAs also administer the delivery of other HIV health and social services, including the Ryan White and State Services HIV funds. This structure ensures the coordination of all agencies serving PLWH, avoids duplication, saves dollars, and provides the comprehensive supportive services for PLWH in each local community.

CDBG Addresses Institutional Structure

Each CDBG applicant must invite local housing organizations to provide input into the project selection process. TDA coordinates with state and federal agencies, regional Councils of Governments, and other partners to further its mission in community and economic development.

TDA also uses conference calls and webinars to provide training and technical assistance throughout the state. On-site project reviews may be conducted based on risk and other factors.

Actions planned to enhance coordination between public and private housing and social service agencies

TDHCA has staff members that participate in several State advisory workgroups and committees. The workgroups and committees which TDHCA leads are listed in Action Plan Section 15. The groups in which TDHCA participates include, but are not limited to the Community Resource Coordination Groups, led by the Health and Human Services Commission (“HHSC”); the Council for Advising and Planning for the Prevention and Treatment of Mental and Substance Use Disorders, led by DSHS; Reentry Task Force, led by Texas Department of Criminal Justice; Interagency Workgroup on Border Issues, led by Secretary of State; Texas Foreclosure Prevention Task force, led by Texas State Affordable Housing Corporation; Money Follows the Person Demonstration Project, led by DADS; Promoting Independence Advisory Committee, led by HHSC; and Texas State Independent Living Council, led by the Texas Department of Assistive and Rehabilitative Services (“DARS”).

TDHCA’s participation in HUD’s Section 811 PRA Program requires linkages between housing and services through a partnership with TDHCA, and the State Medicaid Agency (i.e., HHSC). Because the program is designed so that an individual can access both affordable housing and services in the community, TDHCA staff and HHSC staff meet regularly to ensure both housing and services are coordinated for the program. TDHCA and HHSC have responsibilities to execute the program. TDHCA will use units for the program in multifamily housing financed by TDHCA and the services will be provided by a network of local service providers coordinated by the HHSC enterprise agencies.

HHSCC, established by Texas Government Code §2306.1091, seeks to improve interagency understanding and increase the number of staff in state housing and health services agencies that are conversant in both housing and services. HHSCC supports agencies in their efforts to secure funding for: expansion of Housing Navigators to all Aging and Disability Resource Centers (“ADRCs”) with TDHCA assisting in training; expansion of the Program for All-Inclusive Care for the Elderly (“PACE”); implementation of the Delivery System Redesign Incentive Payment (“DSRIP”) behavioral health projects; implementation of the Balancing Incentives Payment (“BIP”) initiative; and DSHS’ expansion of Oxford Houses for people with Substance Use Disorders. (Other coordination efforts for HHSCC involving people leaving institutions are in Action Plan Section 65.)

Further cooperation was directed by Senate Bill 7 passed during the 83rd Legislative session. Texas Government Code §533.03551 directs the commissioner of HHSC to work in cooperation with TDHCA, TDA, Texas State Affordable Housing Corporation (“TSAHC”), and other federal, state, and local housing entities to develop housing supports for people with disabilities, including individuals with intellectual and developmental disabilities.

Finally, DADS provides Money Follows the Person Demonstration funds to TDHCA for the equivalent of two full-time employees to increase affordable housing options for individuals with disabilities who currently reside in institutions and choose to relocate into the community; and to increase the amount of affordable housing for persons with disabilities, along with other TDHCA programs that will assist in preventing institutionalization. These enhanced coordination efforts further the implementation of many programs included in the Consolidated Plan, including the Section 811 PRA Program, Section 8 Project Access, and HOME Single Family activities.

Discussion:

In addition to the program actions mentioned above, TDHCA strives to meet underserved needs by closely monitoring affordable housing trends and issues as well as conducting its own research. TDHCA also makes adjustments to address community input gathered through roundtable discussions, web-based discussion forums and public hearings held throughout the State.

To foster and maintain affordable housing, TDHCA, TDA, and DSHS provide funds for nonprofit and for-profit organizations and public organizations to develop and maintain affordable housing. Funding sources include grants, low-interest loans, housing tax credits, and mortgage loans.

For lead-based paint hazard mitigation, DSHS has been charged with oversight of the Texas Environmental Lead Reduction Rules (“TELRR”). TELRR cover areas of lead-based paint activities in target housing (housing constructed prior to 1978) and child-occupied facilities, including the training and certification of persons conducting lead inspections, risk assessments, abatements, and project design. For all projects receiving over \$25,000 in federal assistance, contractors need to follow inspections and abatements standards overseen by DSHS. By following these standards, the State is increasing the access to housing without lead-based paint hazards. The adherence to inspection and abatement standards is related to the extent of lead-based paint in that a majority of the housing in need of rehabilitation is likely housing built before 1978.

Furthermore, TDHCA, DSHS, and TDA’s programs are aimed at reducing the number of Texans living in poverty, thereby providing a better quality of life for all Texans. The departments provide long-term solutions to the problems facing people in poverty and focus resources to those with the greatest need.

Regarding institutional structure, TDHCA, DSHS, and TDA are primarily pass-through funding agencies and distribute federal funds to local entities that in turn provide assistance to households. Because of this, the agencies work with many partners, including consumer groups, community based organizations, neighborhood associations, community development corporations, councils of governments, community housing development organizations, community action agencies, real estate developers, social service providers, local lenders, investor-owned electric utilities, local government, nonprofits, faith-based organizations, property managers, state and local elected officials, and other state and federal agencies. Because the agencies do not fund individuals directly, coordination with outside entities is essential to the success of their programs. By structuring its operations this way, the State shares its risk and commits funds in correlation with local needs, local partners are able to concentrate specifically on their area of expertise and gradually expand to offering a further array of programs.

Finally, to enhance coordination between public and private housing and social service agencies, State

agencies chief function is to distribute program funds to local providers that include units of local government, nonprofit and for-profit organizations, community-based organizations, private sector organizations, real estate developers and local lenders. The private housing and social service funds available for priority needs may include loans or grant programs through private banks, for-profit or nonprofit organizations; this source of funding varies from year to year.

Program Specific Requirements

AP-90 Program Specific Requirements – 91.320(k)(1,2,3)

Introduction:

Program specific requirements as referenced in 24 CFR 91.320 (k)(1,2,3) are described below for the CDBG, HOME, and ESG programs.

For the CDBG Program, it is expected that the total amount of program income that will have been received before the start of PY 2015 and that has not yet been reprogrammed will be \$2,500,000. The amount of CDBG urgent need activities is estimated to be \$5,100,000. The 85% of CDBG funds to benefit persons of low to moderate income includes PY 14-16.

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.320(k)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	\$2,500,000
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	\$0
3. The amount of surplus funds from urban renewal settlements	\$0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	\$0
5. The amount of income from float-funded activities	\$0
Total Program Income:	\$2,500,000

Other CDBG Requirements

- | | |
|--|--------------------|
| 1. The amount of urgent need activities | \$5,100,000 |
| 2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan. | 85.00% |

HOME Investment Partnership Program (HOME)

Reference 24 CFR 91.320(k)(2)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

The State is not proposing to use any form of investment in its HOME Program that is not already listed as an eligible for investment in 24 CFR 92.205(b).

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

If the participating jurisdiction intends to use HOME funds for homebuyers, the guidelines for resale or recapture must be described as required in 24 CFR §92.254(a)(5). Recapture provisions are not applicable for HOME-assisted multifamily rental projects; in the case of default, sale, short sale, and/or foreclosure, the entire HOME investment must be repaid.

TDHCA has elected to utilize the recapture provision under 24 CFR §92.254(a)(5)(ii) as its primary method of recapturing HOME funds under any program the State administers that is subject to this provision. The following methods of recapture would be acceptable to TDHCA and will be identified in the note prior to closing.

A. Recapture the amount of the HOME investment reduced on a pro rata share based on the time the homeowner has owned and occupied the unit measured against the required affordability period. The recapture amount is subject to available shared net proceeds in the event of sale or foreclosure of the housing unit.

B. In the event of sale or foreclosure of the housing unit, if the shared net proceeds (i.e., the sales price minus closing costs; any other necessary transaction costs; and loan repayment, other than HOME funds) are in excess of the amount of the HOME investment that is subject to recapture, then the net proceeds may be divided proportionately between TDHCA and the homeowner as set forth in the following mathematical formulas. If there are no Net Proceeds from the sale, no repayment will be required of the homebuyer and the balance of the loan shall be forgiven:

$$\left(\frac{\text{HOME investment}}{\text{HOME investment} + \text{homeowner investment}} \right) \times \text{net proceeds} = \text{HOME amount to be recaptured}$$

$$\left(\frac{\text{Homeowner investment}}{\text{HOME investment} + \text{homeowner investment}} \right) \times \text{net proceeds} = \text{amount to homeowner}$$

C. The household can sell the unit to any willing buyer at any price.

D. In the event that the assisted property is rented or leased, or otherwise ceases to be the principal residence of the initial household, the entire HOME investment is subject to recapture.

E. In the event of sale to a subsequent low-income purchaser of a HOME-assisted homeownership unit, the low-income purchaser may assume the existing HOME loan and recapture obligation entered into by the original buyer if no additional HOME assistance is provided to the subsequent homebuyer. In cases in which the subsequent homebuyer needs HOME assistance in excess of the balance of the original HOME loan, the HOME subsidy (the direct subsidy as described in §92.254) to the original homebuyer must be recaptured. A separate HOME subsidy must be provided to the new homebuyer, and a new affordability period must be established based on that assistance to the buyer.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

In certain limited instances, TDHCA may choose to utilize the resale provision at 24 CFR §92.254(a)(5)(i) under any program the State administers that is subject to this provision. The following method of resale would be acceptable to TDHCA and will be identified in the note prior to closing:

A. Resale is defined as the continuation of the affordability period upon the sale or transfer, rental or lease, refinancing, or if the initial Household is not longer occupying the property as their Principal Residence.

B. Resale requirements must ensure that, if the housing does not continue to be the principal residence of the family for the duration of the period of affordability, the housing is made available for subsequent purchase at an affordable price to a reasonable range of low- or very low-income homebuyers that will use the property as their principal residence.

C. The resale requirement must ensure that the price at resale provides the original HOME-assisted owner a fair return on investment. Fair return on investment is defined as the sum of down payment and closing costs paid from the initial seller's cash at purchase, closing costs paid by the seller at sale, the principal payments only made by the initial homebuyer in excess of the amount required by the loan, and any documented capital improvements in excess of \$500. Fair return on investment is paid to the seller at sale once first mortgage debt is paid and all other conditions of the initial written agreement are met. In the event there are no funds for fair return, then fair return does not exist. In the event there are partial funds for fair return, then fair return shall remain in force.

D. The initial homebuyer's investment of down payment and closing costs divided by TDHCA's HOME investment equals the percentage of appreciated value that shall be paid to the initial homebuyer. The balance of appreciated value shall be paid to TDHCA. If appreciated value is zero, or less than zero, then no appreciated value exists. The HOME loan balance will be transferred to the subsequent buyer and the affordability period will remain in effect. The period of affordability is based on the total amount of HOME funds invested in the housing.

E. In the event that the assisted property is sold during the affordability period, rented or leased, or otherwise ceases to be the principal residence of the initial household, the entire HOME investment will become immediately due and payable if the property does not continue to meet the affordability requirements for the remainder of the affordability period.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

TDHCA may use HOME funds to refinance existing debt secured by multifamily housing that is being rehabilitated with HOME funds as described in 24 CFR §92.206(b). TDHCA shall use its underwriting and evaluation standards, site and development requirements, and application and submission requirements found in 10 TAC, Chapter 10, for refinanced properties in accordance with its administrative rules. At a minimum, these rules require the following:

- that rehabilitation is the primary eligible activity for developments involving refinancing of existing debt;
- that a minimum funding level is set for rehabilitation on a per unit basis;
- that a review of management practices is required to demonstrate that disinvestments in the property has not occurred;
- that long-term needs of the project can be met;
- that the financial feasibility of the development will be maintained over an extended affordability period;
- that whether new investment is being made to maintain current affordable units and/or creates additional affordable units is stated;
- that the required period of affordability is specified;
- that the HOME funds may be used throughout the entire jurisdiction (except as TDHCA may be limited by the Texas Government Code) is specified; and
- that HOME funds cannot be used to refinance multifamily loans made or insured by any Federal program, including CDBG, is stated.

Emergency Solutions Grant (ESG)

Reference 91.320(k)(3)

1. Include written standards for providing ESG assistance (may include as attachment)

- A. Being a unit of general local government or private nonprofit organization.
- B. Documenting that the proposed project has the approval of the municipality in which the project will operate.
- C. Assuring that ESG Subrecipients that are units of local general government obligate funds within 180 days from the date that TDHCA received the award letter from HUD.
- D. Documentation of fiscal accountability.
- E. Proposing to undertake only eligible activities.
- F. Demonstrating need.
- G. Assuring ability to provide matching funds. (The State may grant an exception to the match requirement of up to a total of \$100,000 each fiscal year.)
- H. Demonstrating effectiveness in serving the homeless, including the ability to establish, maintain, and/or improve the self-sufficiency of homeless individuals.
- I. Assuring that homeless individuals will be involved in the provision of services funded through ESG, to the maximum extent feasible, through employment, volunteerism, renovating, maintaining or operating facilities, and/or providing direct services to occupants of facilities assisted with ESG funds.
- J. Assuring the operation of an adequate, sanitary, and safe homeless facility and good-faith administration of a policy designed to ensure that the homeless facility is free from the illegal use, possession, or distribution of drugs or alcohol by its beneficiaries.
- K. Assuring that it will develop and implement procedures to ensure the confidentiality of records of any individual receiving assistance as a result of family violence.
- L. Assuring that all activities it undertakes with assistance under ESG are consistent with the State of Texas Consolidated Plan, the McKinney-Vento Homeless Assistance Act, and all other assurances and certifications.
- M. Assuring the participation in the development and implementation, to the maximum extent practicable and where appropriate, policies and protocols for the discharge of persons from publicly-funded institutions and systems of care to prevent such discharge from immediately resulting in homelessness for such persons. ESG funds are not to be used to assist such persons in

place of State and local resources.

N. Assuring that it will meet HUD's standards for participation in a local Homeless Management Information System and the collection and reporting of client-level information.

O. Any renovation carried out with ESG assistance shall be sufficient to ensure that the building involved is safe and sanitary, and the renovation will assist homeless individuals in obtaining (1) appropriate supportive services, including permanent housing and other services essential for achieving independent living; and (2) other federal, state, local, and private assistance available for such individuals.

2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.

Most of Texas's 12 CoCs do not currently use centralized or coordinated assessment systems. Subrecipients will be required to participate in a centralized or coordinated assessment system in adherence with HUD's requirements and standards as published in the CoC program rule. TDHCA has contracted with a provider to promote the CoCs readiness for this requirement.

3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).

Texas is moving toward noncompetitively funding the COC network. For its competitive awards, Texas releases a NOFA each spring in anticipation of receiving ESG funding. Applications are accepted for generally a 30-day period. Applications are scored and ranked within their CoC regions. CoC regions are ranked according to the combination of the region's proportionate share of the state's total homeless population, based on the most recent Point-in-Time count submitted to HUD by the CoCs and the region's proportionate share of people living in poverty, based on the most recent 5-year ASC poverty data published by the Census Bureau. For the purposes of distributing funds, the percentage of statewide homeless population is weighted at 75% while the percentage of the statewide population in poverty is weighted at 25%.

Eligible applicant organizations are Units of General Purpose Local Government, including cities, counties and metropolitan cities and urban counties that receive ESG funds directly from HUD. Governmental organizations such as COGs, LMHAs, and PHAs are not eligible and cannot apply directly for ESG funds; however COGs, LMHAs, and PHAs may serve as a partner in a collaborative Application but may not be the lead entity.

Eligible Applicant organizations include private nonprofit organizations that are secular or religious organizations described in section 501(c) of the Internal Revenue Code of 1986, are exempt from taxation under subtitle A of the Code, have an acceptable accounting system and a voluntary board, and practice non-discrimination in the provision of assistance. Faith-based organizations receiving ESG funds, like all organizations receiving HUD funds, must serve all eligible beneficiaries without regard to religion.

4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

With the change in the rules so that homeless participation is not required on the boards of Subrecipient agencies, TDHCA will consult with CoC leaders and Subrecipient agencies to design a way to receive input from homeless or formerly homeless persons in considering policies and funding decisions regarding facilities and services funded under ESG.

5. Describe performance standards for evaluating ESG.

Organizations providing street outreach will be required to meet contractual performance targets for the number of persons to be assisted, the number of persons to be provided with case management, and the number of persons who will be placed in temporary, transitional or permanent housing.

Organizations providing emergency shelter and transitional shelter will be required to meet contractual performance targets for the number of persons to be assisted, the number of persons to be provided with case management, and the number of persons who will exit to temporary, transitional housing destinations or permanent housing destinations.

Organizations providing homelessness prevention and rapid re-housing assistance will be required to meet contractual performance targets for the number of persons to be assisted, the number of persons to be provided with housing stability case management services, the number of persons who will increase their non-cash benefits, the number of persons who will have an increase in income at program exit, and, for rapid re-housing, the number of persons who will exit to permanent housing destinations.

Discussion:

For HOME, the State is not proposing to use any form of investment in its HOME Program that is not already listed as an eligible for investment in 24 CFR 92.205(b). As described above, TDHCA may use HOME funds to refinance existing debt secured by multifamily housing that is being rehabilitated with HOME funds as described in 24 CFR §92.206(b). TDHCA shall use its underwriting and evaluation standards, site and development requirements, and application and submission requirements found in 10 Texas Administrative Code, Chapter 10, for refinanced properties in accordance with its administrative rules.

For ESG, performance standards for evaluating ESG are separated by the following activities: street outreach; emergency shelter and transitional shelter; and homelessness prevention and rapid re-housing assistance. These standards are included in each ESG Subrecipients annual contractual agreement with TDHCA.

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Acronyms for the 2015-2019 State of Texas Consolidated Plan

Acronym	For what the acronym stands
AA	Administrative Agencies
ACA	Affordable Care Act
ACS	American Community Survey
ADA	Americans with Disabilities Act
ADRC	Aging and Disability Resource Center
AI	State of Texas Plan for Fair Housing Choice: Analysis of Impediments
AMFI	Area Median Family Income
AMI	Area Median Income
ARRA	American Recovery and Reinvestment Act
BIP	Balancing Incentives Payment
Bootstrap	Texas Bootstrap Loan Program
CAPER	Consolidated Annual Performance Evaluation Report
CD	Community Development Fund
CDBG	Community Development Block Grant
CDC	Centers for Disease Control and Prevention
CEDAP	Colonia Economically Distressed Areas Program Legislative Set - Aside
CFC	Colonia Fund Construction
CFR	Code of Federal Regulations
CHAS	Comprehensive Housing Affordability Strategy
CHDO	Community Housing Development Organizations
CoC	Continuum of Care
COG	Council of Government
CPD	Community Planning and Development
CPF	Colonia Planning Fund
C-RAC	Colonia Resident Advisory Committee
CRD	Texas Workforce Commission Civil Rights Division
CSCU	Client Services Contracting Unit
DADS	Department of Aging and Disability Services
DARS	Department of Assistive and Rehabilitative Services
DAW	Disability Advisory Workgroup
DFPS	Department of Family and Protective Services
DSHS	Department of State Health Services
DSRIP	Delivery System Redesign Incentive Payment
Epi Profile	STD and HIV Integrated Epidemiologic Profile
ESG	Emergency Solutions Grant Program
FEMA	Federal Emergency Management Agency
FHEO	Fair Housing and Equal Opportunity (HUD Office of)
FMR	Fair Market Rent
FPL	Federal Poverty Level

Acronym	For what the acronym stands
FVPSA	Family Violence Prevention and Services Act
GED	General Education Development
GPs	General Provisions
HA	Housing Authority
HCV	Housing Choice Voucher
HFC	Housing Finance Corporation
HHS	Health and Human Services
HHSC	Health and Human Services Commission
HHSCC	Housing and Health Services Coordination Council
HHSP	Homeless Housing and Services Program
HMIS	Homeless Management Information Systems
HOME	HOME Investment Partnerships Program
HOPWA	Housing Opportunities for Persons with AIDS
HQS	Housing Quality Standards
HSDA	HIV Service Delivery Areas
HTC	Housing Tax Credit
HUD	U.S. Department of Housing and Urban Development
ICF	Intermediate Care Facility
IDIS	Integrated Disbursement and Information System
IID	Individuals with Intellectual Disabilities
LIHTC	Low Income Housing Tax Credit Program
LMHA	Local Mental Health Authority
LMI	Low and Moderate Income
LURA	Land Use Restrictive Agreement
MAI	Minority AIDS Initiative
MCC	Mortgage Credit Certificate
MLS	Multiple Listing Service
MSA	Metropolitan Statistical Area
MSM	men who have sex with men
NAHRO	National Association of Housing and Redevelopment Officials
NIMBY	Not In My Back Yard
NOFA	Notice of Funding Availability
NSP PI	Neighborhood Stabilization Program - Program Income
OCI	Office of Colonia Initiatives
OMB	Office of Management and Budget
PACE	Program for All-Inclusive Care for the Elderly
PATH	Projects for Assistance in Transition from Homelessness
PHA	Public Housing Authority
PHP	Permanent Housing Placement
PJ	Participating Jurisdiction (in the HOME Program)

Acronym	For what the acronym stands
PLWH	People living with HIV/AIDS
PRA	Project Rental Assistance
PY	Program Year
QAP	Qualified Allocation Plan
RAD	Rental Assistance Demonstration
RAF	Regional Allocation Formula
REO	Real Estate Owned
RFP	Request for Proposal
RLF	Revolving Loan Fund
RRC	Regional Review Committee
SHC	Self Help Center (for colonias)
SOW	Statement of Work
SRO	Single Room Occupancy
State	State of Texas
STD	Sexually Transmitted Disease
STEM	Science, Technology, Engineering and Math
STEP	Texas Small Towns Environment Program
STRMU	Short Term Rent Mortgage and Utility
TB	Tuberculosis
TBRA	Tenant-Based Rental Assistance
TCAP PI	Tax Credit Assistance Program - Program Income
TCEQ	Texas Commission on Environmental Quality
TCF	Texas Capital Fund
TDA	Texas Department of Agriculture
TDHCA	Texas Department of Housing and Community Affairs
TELRR	Texas Environmental Lead Reduction Rules
the Center	The Texas A&M Real Estate Center
TICH	Texas Interagency Council for the Homeless
TJJD	Texas Juvenile Justice Department
TWDB	Texas Water Development Board
TWICC	Texas Water Infrastructure Coordination Committee
UPCS	Uniform Physical Condition Standards
USDA	U.S. Department of Agriculture
VA	U.S. Department of Veterans Affairs
VAWA	Violence Against Woman Act
WAP PAC	Weatherization Assistance Program Planning Advisory Committee

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Process Chapter (PR) Consultation Supplemental Information

(Sorted alphabetically by Organization Name)

PR-10 Table 2. Sort Number	Organization Name	Date of Consultation	Method of Consultation	Saved in IDIS	Lead Agency
13	Advocacy Outreach	1/9/2014	CoC Survey and Texas Homeless Summit	Yes	TDHCA
63	AIDS Coalition of Coastal Texas Inc.	6/5/2014	HOPWA Stakeholders Roundtable	Yes	DSHS
54	AIDS Foundation of Houston	6/5/2014	HOPWA Stakeholders Roundtable	Yes	DSHS
60	AIDS Outreach Center	6/5/2014	HOPWA Stakeholders Roundtable	Yes	DSHS
41	Alamo Area Resource Center	6/5/2014	HOPWA Stakeholders Roundtable	Yes	DSHS
	Alamo Regional Review Committee	7/15/2014	Council of Government Public Hearing	No	TDA
79	ARCIL, INC.	4/24/2014	Disability Advisory Workgroup	Yes	TDHCA
	Ark-Tex Regional Review Committee	7/29/2014	Council of Government Public Hearing	No	TDA
19	Austin Habitat for Humanity	4/3/2014	SF Roundtable #1	Yes	TDHCA
9	Bay Area Turning Point, Inc.	1/9/2014	CoC Survey and Texas Homeless Summit	Yes	TDHCA
33	Bexar County	6/5/2014	HOPWA Stakeholders Roundtable	Yes	DSHS
59	Big Country AIDS Resources (BCAR)	6/5/2014	HOPWA Stakeholders Roundtable	Yes	DSHS
	Brazos Valley Affordable Housing Corporation	8/13/2014	SF Roundtable #2	No	TDHCA
32	Brazos Valley Council of Governments	6/5/2014	HOPWA Stakeholders Roundtable	Yes	DSHS
	Cameron County	8/6/2014	Colonia Self Help Program Workshop	No	TDHCA
	Capital Area Regional Review Committee	8/1/2014	Council of Government Public Hearing	No	TDA
37	Catholic Charities of the Archdiocese of Galveston-Houston	6/5/2014	HOPWA Stakeholders Roundtable	Yes	DSHS
	Central Texas Regional Review Committee	7/24/2014	Council of Government Public Hearing	No	TDA
72	City of Amarillo	5/20/2014	TICH Quarterly Meeting #1	Yes	TDHCA
	City of Andrews	7/23/2014	Public Hearing comment via letter	No	TDHCA
	City of Carrizo Springs	7/23/2014	Public Hearing comment via letter	No	TDHCA
	City of Fort Stockton	7/23/2014	Public Hearing comment via letter	No	TDHCA
65	City of Killeen	6/5/2014	HOPWA Stakeholders Roundtable	Yes	DSHS
56	City of Laredo Health Department HIV Program	6/5/2014	HOPWA Stakeholders Roundtable	Yes	DSHS
66	City of Mesquite	6/5/2014	HOPWA Stakeholders Roundtable	Yes	DSHS
64	City of Temple	6/5/2014	HOPWA Stakeholders Roundtable	Yes	DSHS
88	City of Trinity	7/23/2014	Public Hearing	Yes	TDHCA

PR-10 Table 2. Sort Number	Organization Name	Date of Consultation	Method of Consultation	Saved in IDIS	Lead Agency
69	City of Waco	5/20/2014	TICH Quarterly Meeting #1	Yes	TDHCA
89	City of Wolfe City	7/23/2014	Public Hearing	Yes	TDHCA
68	Coastal Bend Center for Independent Living	5/20/2014	TICH Quarterly Meeting #1	Yes	TDHCA
68	Coastal Bend Center for Independent Living	7/23/2014	Public Hearing comment via email	Yes	TDHCA
68	Coastal Bend Center for Independent Living	8/13/2014	SF Roundtable #2	Yes	TDHCA
58	Coastal Bend Wellness Foundation	6/5/2014	HOPWA Stakeholders Roundtable	Yes	DSHS
42	Community Action, INC. of Hays, Caldwell, & Blanco Counties	6/5/2014	HOPWA Stakeholders Roundtable	Yes	DSHS
74	Community Development Corporation of Brownsville	6/19/2014	Environmental Clearance Workshop	Yes	TDHCA
74	Community Development Corporation of Brownsville	8/6/2014	Colonia Self Help Program Workshop	Yes	TDHCA
91	Community Resource Group	8/6/2014	Colonia Self Help Program Workshop	Yes	TDHCA
	Concho Valley Regional Review Committee	7/31/2014	Council of Government Public Hearing	No	TDA
67	Cornerstone Assistance Network	5/20/2014	TICH Quarterly Meeting #1	Yes	TDHCA
67	Cornerstone Assistance Network	7/28/2014	TICH Quarterly Meeting #2	Yes	TDHCA
6	Covenant House Texas	1/9/2014	CoC Survey and Texas Homeless Summit	Yes	TDHCA
34	Dallas County Health and Human Services	6/5/2014	HOPWA Stakeholders Roundtable	Yes	DSHS
	Deep East Texas Regional Review Committee	7/29/2014	Council of Government Public Hearing	No	TDA
	Delphi Affordable Housing	8/13/2014	SF Roundtable #2	No	TDHCA
80	Disability Rights Texas	4/24/2014	Disability Advisory Workgroup	Yes	TDHCA
	East Texas Regional Review Committee	7/15/2014	Council of Government Public Hearing	No	TDA
21	Easter Seals of Central Texas	4/3/2014	SF Roundtable #1	Yes	TDHCA
21	Easter Seals of Central Texas	4/24/2014	Disability Advisory Workgroup	Yes	TDHCA
21	Easter Seals of Central Texas	7/9/2014	HHSCC meeting	Yes	TDHCA
21	Easter Seals of Central Texas	8/13/2014	SF Roundtable #2	Yes	TDHCA
87	EFC Builders	7/23/2014	Public Hearing	Yes	TDHCA
	El Paso Collaborative	8/5/2014	letter via email	No	TDHCA
	El Paso County	8/6/2014	Colonia Self Help Program Workshop	No	TDHCA
	Esperanza Health and Dental Centers	8/15/2014	email	No	TDHCA
3	Faith Mission and Heal Center	1/9/2014	CoC Survey and Texas Homeless	Yes	TDHCA

PR-10 Table 2. Sort Number	Organization Name	Date of Consultation	Method of Consultation	Saved in IDIS	Lead Agency
			Summit		
10	Family Abuse Center	1/9/2014	CoC Survey and Texas Homeless Summit	Yes	TDHCA
11	Family Violence Prevention Services, INC.	1/9/2014	CoC Survey and Texas Homeless Summit	Yes	TDHCA
73	Fort Bend Corps	6/19/2014	Environmental Clearance Workshop	Yes	TDHCA
	Golden Cresecent Regional Review Committee	8/22/2014	Council of Government Public Hearing	No	TDA
	Grant Development Services	7/23/2014	Public Hearing	No	TDHCA
22	GrantWorks, Inc.	4/3/2014	SF Roundtable #1	Yes	TDHCA
22	GrantWorks, Inc.	7/23/2014	Public Hearing	Yes	TDHCA
22	GrantWorks, Inc.	8/13/2014	SF Roundtable #2	Yes	TDHCA
26	GUADALUPE NEIGHBORHOOD DEVELOPMENT CORPORATION	4/3/2014	SF Roundtable #1	Yes	TDHCA
23	Habitat for Humanity of Tyler	4/3/2014	SF Roundtable #1	Yes	TDHCA
16	Habitat for Humanity of Victoria	4/3/2014	SF Roundtable #1	Yes	TDHCA
	Habitat for Humanity Texas	8/13/2014	SF Roundtable #2	No	TDHCA
53	Health Horizons of East Texas	6/5/2014	HOPWA Stakeholders Roundtable	Yes	DSHS
	Heart of Texas Regional Review Committee	6/24/2014	Council of Government Public Hearing	No	TDA
	Heart of Texas Regional Review Committee	7/25/2014	Council of Government Public Hearing	No	TDA
	Hidalgo County	8/6/2014	Colonia Self Help Program Workshop	No	TDHCA
	Hogg Foundation for Mental Health	7/9/2014	HHSCC meeting	No	TDHCA
	Howco Services	8/13/2014	SF Roundtable #2	No	TDHCA
	HUD San Antonio Field Office	8/6/2014	Colonia Self Help Program Workshop	No	TDHCA
24	Hunter and Hunter	4/3/2014	SF Roundtable #1	Yes	TDHCA
24	Hunter and Hunter	8/13/2014	SF Roundtable #2	Yes	TDHCA
83	Inclusive Communities Project	7/31/2014	Online Discussion Forum	Yes	TDHCA
61	International AIDS Empowerment	6/5/2014	HOPWA Stakeholders Roundtable	Yes	DSHS
1	La Posada Providencia	1/9/2014	CoC Survey and Texas Homeless Summit	Yes	TDHCA
25	Langford Community Management Services	4/3/2014	SF Roundtable #1	Yes	TDHCA
25	Langford Community Management Services	7/23/2014	Public Hearing	Yes	TDHCA
25	Langford Community Management Services	8/13/2014	SF Roundtable #2	Yes	TDHCA

PR-10 Table 2. Sort Number	Organization Name	Date of Consultation	Method of Consultation	Saved in IDIS	Lead Agency
62	Legacy Counseling Center, Inc.	6/5/2014	HOPWA Stakeholders Roundtable	Yes	DSHS
14	Loaves & Fishes of the Rio Grande Valley, Inc.	1/9/2014	CoC Survey and Texas Homeless Summit	Yes	TDHCA
	Lower Rio Grande Valley Regional Review Committee	7/10/2014	Council of Government Public Hearing	No	TDA
39	Maverick County Hospital District	6/5/2014	HOPWA Stakeholders Roundtable	Yes	DSHS
27	Meals on Wheels and More, Inc.	4/3/2014	SF Roundtable #1	Yes	TDHCA
27	Meals on Wheels and More, Inc.	4/24/2014	Disability Advisory Workgroup	Yes	TDHCA
27	Meals on Wheels and More, Inc.	8/13/2014	SF Roundtable #2	Yes	TDHCA
	Middle Rio Grande Regional Review Committee	7/16/2014	Council of Government Public Hearing	No	TDA
	Midland Community Development Corporation	8/13/2014	SF Roundtable #2	No	TDHCA
20	Neighborhood Land Corp./Trinity Habitat	4/3/2014	SF Roundtable #1	Yes	TDHCA
	Nortex Regional Review Committee	7/10/2014	Council of Government Public Hearing	No	TDA
	North Central Texas Regional Review Committee	8/5/2014	Council of Government Public Hearing	No	TDA
48	Panhandle AIDS Support Organization	6/5/2014	HOPWA Stakeholders Roundtable	Yes	DSHS
86	Panhandle Regional Planning Commission	7/23/2014	Public Hearing	Yes	TDHCA
	Panhandle Regional Review Committee	7/9/2014	Council of Government Public Hearing	No	TDA
49	Permian Basin Community Centers	6/5/2014	HOPWA Stakeholders Roundtable	Yes	DSHS
	Permian Basin Regional Review Committee	7/30/2014	Council of Government Public Hearing	No	TDA
4	Project VIDA	1/9/2014	CoC Survey and Texas Homeless Summit	Yes	TDHCA
93	Proyecto Azteca	8/6/2014	Colonia Self Help Program Workshop	Yes	TDHCA
18	Public Management Incorporated	4/3/2014	SF Roundtable #1	Yes	TDHCA
	Rio Grande Regional Review Committee	7/23/2014	Council of Government Public Hearing	No	TDA
36	Samaritan House	6/5/2014	HOPWA Stakeholders Roundtable	Yes	DSHS
90	San Patricio County	7/23/2014	Public Hearing	Yes	TDHCA
46	Shannon Supportive Health Services	6/5/2014	HOPWA Stakeholders Roundtable	Yes	DSHS
12	Shelter Agencies for Families East Texas	1/9/2014	CoC Survey and Texas Homeless Summit	Yes	TDHCA
71	South East Texas Regional Planning Commission	5/20/2014	TICH Quarterly Meeting #1	Yes	TDHCA
50	South Plains Community Action Agency	6/5/2014	HOPWA Stakeholders Roundtable	Yes	DSHS

PR-10 Table 2. Sort Number	Organization Name	Date of Consultation	Method of Consultation	Saved in IDIS	Lead Agency
	South Plains Regional Review Committee	7/8/2014	Council of Government Public Hearing	No	TDA
2	South Texas Adult Resource And Training Center	1/9/2014	CoC Survey and Texas Homeless Summit	Yes	TDHCA
31	South Texas Development Council	6/5/2014	HOPWA Stakeholders Roundtable	Yes	DSHS
	South Texas Regional Review Committee	7/16/2014	Council of Government Public Hearing	No	TDA
	Southeast Texas Regional Review Committee	7/9/2014	Council of Government Public Hearing	No	TDA
55	Special Health Resources	6/5/2014	HOPWA Stakeholders Roundtable	Yes	DSHS
	Starr County Self Help Center	8/6/2014	Colonia Self Help Program Workshop	No	TDHCA
51	Sun City Behavioral Health Care	6/5/2014	HOPWA Stakeholders Roundtable	Yes	DSHS
30	Tarrant County	6/5/2014	HOPWA Stakeholders Roundtable	Yes	DSHS
29	Texas Association of Community Development Corporations	4/3/2014	SF Roundtable #1	Yes	TDHCA
38	Texas Council for Developmental Disabilities	6/5/2014	HOPWA Stakeholders Roundtable	Yes	DSHS
81	Texas Department of Aging and Disability Services (DADS)	4/24/2014	Disability Advisory Workgroup	Yes	TDHCA
	Texas Department of Aging and Disability Services (DADS)	8/7/2014	CRCG State Workgroup	No	TDHCA
	Texas Department of Assistive and Rehabilitative Services (DARS)	8/7/2014	CRCG State Workgroup	No	TDHCA
76	Texas Department of Criminal Justice (TDCJ)	7/28/2014	TICH Quarterly Meeting #2	Yes	TDHCA
77	Texas Department of Family and Protective Services	7/28/2014	TICH Quarterly Meeting #2	Yes	TDHCA
	Texas Department of Family and Protective Services	8/7/2014	CRCG State Workgroup	No	TDHCA
82	Texas Department of State Health Services (DSHS)	4/24/2014	Disability Advisory Workgroup	Yes	TDHCA
	Texas Department of State Health Services (DSHS)	8/11/2014	email re: Lead-based Paint	No	DSHS
78	Texas Education Agency	7/28/2014	TICH Quarterly Meeting #2	Yes	TDHCA
75	Texas Health and Human Services Commission	5/20/2014	TICH Quarterly Meeting #1	Yes	TDHCA
75	Texas Health and Human Services Commission	7/28/2014	TICH Quarterly Meeting #2	Yes	TDHCA
	Texas Health and Human Services Commission	8/7/2014	CRCG State Workgroup	No	TDHCA
	Texas Health and Human Services	8/14/2014	email from Regional Partnership	No	TDHCA

PR-10 Table 2. Sort Number	Organization Name	Date of Consultation	Method of Consultation	Saved in IDIS	Lead Agency
	Commission		Specialist		
8	Texas Homeless Network	1/9/2014	CoC Survey and Texas Homeless Summit	Yes	TDHCA
8	Texas Homeless Network	5/20/2014	TICH Quarterly Meeting #1	Yes	TDHCA
	Texas Juvenile Justice Department (TJJD)	8/7/2014	CRCG State Workgroup	No	TDHCA
	Texas Juvenile Justice Department (TJJD)	8/13/2014	letter via email	No	TDHCA
70	Texas State Affordable Housing Corporation	4/3/2014	SF Roundtable #1	Yes	TDHCA
70	Texas State Affordable Housing Corporation	4/24/2014	Disability Advisory Workgroup	Yes	TDHCA
70	Texas State Affordable Housing Corporation	5/20/2014	TICH Quarterly Meeting #1	Yes	TDHCA
70	Texas State Affordable Housing Corporation	7/28/2014	TICH Quarterly Meeting #2	Yes	TDHCA
	Texas Veterans Commission	7/9/2014	HHSCC meeting	No	TDHCA
	Texas Workforce Commission (TWC)	5/20/2014	TICH Quarterly Meeting #1	Yes	TDHCA
	Texas Workforce Commission (TWC)	7/28/2014	TICH Quarterly Meeting #2	Yes	TDHCA
	Texas Workforce Commission (TWC)	8/7/2014	CRCG State Workgroup	No	TDHCA
	Texas Workforce Commission (TWC)	8/18/2014	email from TWC Civil Rights Division	No	TDHCA
	Texoma Regional Review Committee	7/10/2014	Council of Government Public Hearing	No	TDA
35	The Houston Regional HIV/AIDS Resource Group, Inc.	6/5/2014	HOPWA Stakeholders Roundtable	Yes	DSHS
84	Trans Pride Initiative	7/31/2014	Online Discussion Forum	Yes	TDHCA
28	Traylor and Associates	4/3/2014	SF Roundtable #1	Yes	TDHCA
28	Traylor and Associates	6/19/2014	Environmental Clearance Workshop	Yes	TDHCA
28	Traylor and Associates	8/13/2014	SF Roundtable #2	Yes	TDHCA
52	Triangle Aids Network	6/5/2014	HOPWA Stakeholders Roundtable	Yes	DSHS
15	Twin City Mission	1/9/2014	CoC Survey and Texas Homeless Summit	Yes	TDHCA
85	United Way for Greater Austin	7/31/2014	Online Discussion Forum	Yes	TDHCA
43	United Way of Greater Fort Hood	6/5/2014	HOPWA Stakeholders Roundtable	Yes	DSHS
45	Unity Partners dba Project Unity	6/5/2014	HOPWA Stakeholders Roundtable	Yes	DSHS
	Val Verde County	8/6/2014	Colonia Self Help Program Workshop	No	TDHCA
57	Valley AIDS Council	6/5/2014	HOPWA Stakeholders Roundtable	Yes	DSHS
40	Victoria City-County Health Department	6/5/2014	HOPWA Stakeholders Roundtable	Yes	DSHS
44	Waco/McLennan County Public Health	6/5/2014	HOPWA Stakeholders Roundtable	Yes	DSHS

PR-10 Table 2. Sort Number	Organization Name	Date of Consultation	Method of Consultation	Saved in IDIS	Lead Agency
	District				
92	Webb County Community Action Agency	8/6/2014	Colonia Self Help Program Workshop	Yes	TDHCA
	West Central Texas Regional Review Committee	7/11/2014	Council of Government Public Hearing	No	TDA
	Wrem Literacy Group Inc	8/13/2014	SF Roundtable #2	No	TDHCA
47	Your Health Clinic	6/5/2014	HOPWA Stakeholders Roundtable	Yes	DSHS
5	Youth And Family Alliance DBA Lifeworks	1/9/2014	CoC Survey and Texas Homeless Summit	Yes	TDHCA

Summary and Response of Consultation Public Comment

PR-10 Consultation - 91.110, 91.300(b); 91.315(l)

Responses to public comment received at 7/23/2014 Public hearing

Commenter	Organization	Format of Comments	Program
1. Eric Christophe	Home builder	Oral comment provided at public hearing	HOME

TDHCA Comment Summary:

Commenter requested that reimbursement payments for HOME program subrecipients be made in a timelier manner from TDHCA. Faster payments to subrecipients would assist with faster payments to the small contractors with limited capacity to operate without timely reimbursement. Commenter also indicated that the HOME program is very beneficial to the clients he works with.

TDHCA Response to Public Comment:

TDHCA appreciates the comments made by representatives of the builder community. The HOME Program reimburses administrators for costs that they have incurred; draw requests sent to TDHCA with all necessary support documentation and with limited errors are processed quickly and impact on subcontractor payments should be minimal. Further, Administrators may pay contractors for work performed before receiving reimbursement from TDHCA.

Commenter	Organization	Format of Comments	Program
2. Donna Johnson	GrantWorks	Oral comment provided at public hearing; attachments provided	HOME

TDHCA Comment Summary:

Commenter began by applauding staff efforts at TDHCA. Commenter then encouraged TDHCA to return to awarding funds via contracts, instead of using the reservation system, in the administration of the HOME Homeowner Rehabilitation Assistance (HRA) activity. Further, commenter requested that in returning to contract awards, TDHCA would extend the time provided to awardees between award notification and providing up to 12 months. This extended time period would allow awardees enough time to identify an appropriate number of homeowners to serve within the funding amount.

Commenter also suggested that funding for the HRA program be increased to meet the great demand for the program statewide. To increase funding for HRA, commenter encouraged TDHCA to take repayment funds from the Tax Credit Assistance Program and allocate those funds for Multi-Family activities, freeing up Multi-family HOME funds to be moved to Single-family HOME activities.

TDHCA Response to Public Comment:

TDHCA appreciates the commenter's recognition of staff efforts to continuously improve the Single Family HOME Program. In contrast to prior experience with awarding prospective contracts, TDHCA's

Reservation System is a proven method for serving households quickly, effectively, and with a great amount of flexibility while providing assistance in more geographic areas than contracts would. While releasing funds via contracting would increase predictability for administrators and consultants, it would do so at risk of losing the great benefits noted above.

In response to comments received, TDHCA is proposing to shift HOME resources from multifamily to single family activities. This will increase the amount of funding available for homeowner rehabilitation assistance activities and is more fully described in the Strategic Plan and One Year Action Plan chapters of the Consolidated Plan.

TDHCA continues to anticipate that funding levels will remain well below historic values, and recognizes a need for continued flexibility to be able to make funds available to parts of the state. Therefore, TDHCA is not proposing to return to a contract award model during fiscal year 2015; however TDHCA has proposed targeting funding levels per activity in the One Year Action Plan Section of the Consolidated Plan, rather than combining funds into one pot of funds for all activities. TDHCA anticipates that this will increase the number of households that may be served per year.

Commenter	Organization	Format of Comments	Program
3. Judy Langford	Langford Community Management Services	Oral comment provided at public hearing	CDBG & HOME

TDHCA Comment Summary:

Commenter supported comments provided by Mr. Christophe and Ms. Johnson regarding the HOME program allocation process. Commenter supports a return to awarding contracts, instead of using the reservation system, to allocate HOME funds. Further, commenter requested that TDHCA staff address how the Office of Management and Budget (“OMB”) Super Circular will affect TDHCA programs and how updated OMB requirements will be implemented.

TDHCA Response to Public Comment:

TDHCA continues to anticipate that funding levels will remain well below historic values, and recognizes a need for continued flexibility to be able to make funds available to parts of the state. Therefore, TDHCA is not proposing to return to a contract award model during fiscal year 2015; however TDHCA has proposed targeting funding levels per activity in the One Year Action Plan Section of the Consolidated Plan, rather than combining funds into one pot of funds for all activities. TDHCA anticipates that this will increase the number of households that may be served per year.

Regarding the new OMB regulations consolidating Circulars and providing additional guidance, OMB has not resolved several unclear aspects of the circular, and therefore HUD has not yet released final guidance on how the circular will affect HUD Programs. TDHCA plans to hold training sessions regarding the implementation of OMB following HUD guidance once it is clear to TDHCA how ESG and HOME will be impacted.

TDA Comment Summary:

[CDBG Summary only] Ms. Langford supported comments from Mr. Ingham and would like to see the continued use of the 2014 Action Plan for CDBG until there are further discussions.

Ms. Langford called to the agencies' attention the new OMB regulations consolidating Circulars and providing additional guidance. The current TDA funding for grant consultants is difficult for small businesses to manage cash flow, but the OMB allows or requires payment on the front end which would help small businesses.

TDA Response to Public Comment:

TDA has postponed changes to the Community Development Fund in order to allow further review and stakeholder input on scoring criteria for this fund. Stakeholders will be notified as opportunities for input are made available.

TDA is reviewing the available guidance from the Office of Management and Budget.

Commenter	Organization	Format of Comments	Program
4. Glen Hackler	Andrews City Manager	Letter submitted at public hearing	HOME

TDHCA Comment Summary:

Commenter strongly encouraged TDHCA to return to the award of contracts for the HOME HRA program, therefore guaranteeing funding for a certain number of homes. To address expenditure concerns that TDCHA may have, commenter suggested that TDHCA not fund the contracts until 12 months after contract award. Commenter noted that the current reservation method is a gamble, making it difficult to get funding for more than a single house before the funds are gone.

Additionally, the commenter requested that HOME HRA activity be funded at a rate commensurate with demand by reallocating Tax Credit Assistance Program ("TCAP") program income funds to HOME Multi-family projects, therefore freeing up HOME funds to be used on single family activities.

Finally commenter emphasized the cost savings to both the individual and to the Federal Government if homeowners are allowed to age in place.

TDHCA Response to Public Comment:

TDHCA's Reservation System is a proven method for serving households quickly, effectively, and with a great amount of flexibility. In response to comments received, TDHCA is proposing to shift HOME resources from multifamily to single family activities. This will increase the amount of funding available for single-family activities and is more fully described in the Strategic Plan and One Year Action Plan chapters of the Consolidated Plan.

TDHCA continues to anticipate that funding levels will remain well below historic values, and recognizes a need for continued flexibility to be able to make funds available to parts of the state. Therefore, TDHCA is not proposing to return to a contract award model during fiscal year 2015; however, TDHCA has proposed targeting funding levels per activity in the One Year Action Plan Section of the

Consolidated Plan, rather than combining funds into one pot of funds for all activities. TDHCA anticipates that this will increase the number of households that may be served per year and will ensure additional funds will be available for activities designed to allow homeowners to age in place.

Commenter	Organization	Format of Comments	Program
5. Gregory Howard	City of Carrizo Springs	Letter submitted at public hearing	HOME

TDHCA Comment Summary:

Commenter strongly encouraged TDHCA to return to the award of contracts for the HOME HRA program, thereby guaranteeing funding for a certain number of homes. Commenter also recommended the delay of funding until 12-months after contract award. These actions would allow the builders to provide their best possible price when bidding on homes because economies of scale are at work.

Additionally, commenter requested that HOME HRA activity be funded at a rate commensurate with demand by reallocating Tax Credit Assistance Program (“TCAP”) program income funds to HOME Multi-family projects, therefore freeing up HOME funds to be used on single family activities.

TDHCA Response to Public Comment:

TDHCA’s Reservation System is a proven method for serving households quickly, effectively, and with a great amount of flexibility. In response to comments received, TDHCA is proposing to shift HOME resources from multifamily to single family activities. This will increase the amount of funding available for homeowner rehabilitation assistance activities and is more fully described in the Strategic Plan and One Year Action Plan chapters of the Consolidated Plan.

TDHCA continues to anticipate that funding levels will remain well below historic values, and recognizes a need for continued flexibility to be able to make funds available to parts of the state. Therefore, TDHCA is not proposing to return to a contract award model during fiscal year 2015; however, TDHCA has proposed targeting funding levels per activity in the One Year Action Plan Section of the Consolidated Plan, rather than combining funds into one pot of funds for all activities. TDHCA anticipates that this will increase the number of households that may be served per year.

Commenter	Organization	Format of Comments	Program
6. Raul Rodriguez	City of Fort Stockton	Letter submitted at public hearing	HOME

TDHCA Comment Summary:

Commenter strongly encouraged TDHCA to return to the award of contracts for the HOME HRA program, noting the burdens that the reservation system has created for rural cities and counties. Specifically, commenter noted that among the problems are the rush created when funding is released and the requirements to pay up-front for house-specific services such as appraisals.

Commenter requested that program rules be changed to allow for appraisals to be obtained and submitted following the submission and acceptance of a set-up rather than prior to it.

Additionally, commenter requested that HOME Multi-family projects be funded with Tax credit Assistance Program (“TCAP”) program income funds, therefore freeing up HOME funds to be used on single family activities.

TDHCA Response to Public Comment:

TDHCA’s Reservation System is a proven method for serving households quickly, effectively, and with a great amount of flexibility. In response to comments received, TDHCA is proposing to shift a portion of HOME resources from multifamily to single family activities. This will increase the amount of funding available for single-family activities and is more fully described in the Strategic Plan and One Year Action Plan chapters of the Consolidated Plan.

TDHCA continues to anticipate that funding levels will remain well below historic levels, and recognizes a need for continued flexibility to be able to make funds available to parts of the state. Therefore, TDHCA is not proposing to return to a contract award model during fiscal year 2015; however, TDHCA has proposed targeting funding levels per activity in the One Year Action Plan Section of the Consolidated Plan, rather than combining funds into one pot of funds for all activities. TDHCA anticipates that this will increase the number of households that may be served per year.

TDHCA requires appraisals be submitted to the Department to demonstrate that each assisted property will meet this requirement before the activity is authorized to start construction. TDHCA recognizes that this may, from time to time, cause a hardship on some communities and will therefore not disapprove the activity. The Administrator will, however, be required to obtain the appraisal as part of the deficiency process before the activity receives final approval for fund commitment.

Commenter	Organization	Format of Comments	Program
7. Terry Simpson	San Patricio County	Letter submitted at public hearing	HOME

TDHCA Comment Summary:

Commenter expressed concern about the lack of funds in the HOME Reservation Program and encouraged TDHCA to use TCAP repayment funds in place of Multi-family HOME funds, freeing up those funds to be moved into the Single Family HOME Program.

Commenter supports the process of allowing homes to be submitted for set-up in the TDHCA system as they are ready and having TDHCA fund projects in the order of the date of submission, making it a truly first-complete, first served reservation program. If a submitted set-up is missing the title commitment it should be rejected by TDHCA, thus moving to the bottom of the list once the title commitment has been received

TDHCA Response to Public Comment:

TDHCA’s Reservation System is a proven method for serving households quickly, effectively, and with a great amount of flexibility. In response to comments received, TDHCA is proposing to shift HOME resources from multifamily to single family activities. This will increase the amount of funding available

for homeowner rehabilitation assistance activities and is more fully described in the Strategic Plan and One Year Action Plan chapters of the Consolidated Plan.

TDHCA continues to anticipate that funding levels will remain well below historic levels, and recognizes a need for continued flexibility to be able to make funds available to parts of the state. Therefore, TDHCA is not proposing to return to a contract award model during fiscal year 2015; however TDHCA has proposed targeting funding levels per activity in the One Year Action Plan Section of the Consolidated Plan, rather than combining funds into one pot of funds for all activities. TDHCA anticipates that this will increase the number of households that may be served per year.

As it relates to documentation required to reserve funds, TDHCA allows Administrators a curative period of time to submit items that may have been inadvertently left out of project approval documentation, such as a title commitment or appraisal. However, the Department will release funds reserved for activities if we determine, in our discretion, that a funding request was substantially incomplete when it was submitted to TDHCA.

Commenter	Organization	Format of Comments	Program
8. Billy Slaughter	City of Trinity	Letter submitted at public hearing	HOME

TDHCA Comment Summary:

Commenter requested that TDHCA either bring back contracts for the HOME HRA program or allow HOME program administrators to submit set-ups as they are ready, prior to the release of funding. Commenter also emphasized that using TCAP repayments for multifamily funding and transferring the multifamily HOME funds to single-family will be very beneficial for all of rural Texas.

TDHCA Response to Public Comment:

TDHCA’s Reservation System allows administrators to enter households in the system, essentially lining them up, prior to release of funding. Funds may not be reserved for those households, however, until there is funding available for the activity.

In response to comments received, TDHCA is proposing to shift HOME resources from multifamily to single family activities. This will increase the amount of funding available for single-family activities and is more fully described in the Strategic Plan and One Year Action Plan chapters of the Consolidated Plan.

TDHCA continues to anticipate that funding levels will remain well below historic levels, and recognizes a need for continued flexibility to be able to make funds available to parts of the state. Therefore, TDHCA is not proposing to return to a contract award model during fiscal year 2015; however, TDHCA has proposed targeting funding levels per activity in the One Year Action Plan Section of the Consolidated Plan, rather than combining funds into one pot of funds for all activities. TDHCA anticipates that this will increase the number of households that may be served per year.

Commenter	Organization	Format of Comments	Program
9. Barbara Woodruff	Wolfe City	Letter submitted at public hearing	HOME

TDHCA Comment Summary:

Commenter emphasized that using TCAP repayments for multifamily funding and transferring the multifamily HOME funds to single-family will be very beneficial for all of rural Texas. Commenter also indicated that budget and implementation limitations of the HOME RSP Program are making it very difficult to participate in the program effectively. Commenter also requests that HOME program administrators be allowed to submit set-ups as they are ready, prior to the release of funding.

TDHCA Response to Public Comment:

TDHCA’s Reservation System allows administrators to enter households in the system, essentially lining them up prior to release of funding. Funds may not be reserved for those households, however, until there is funding available for the activity.

In response to comments received, TDHCA is proposing to shift HOME resources from multifamily to single family activities. This will increase the amount of funding available single-family activities and is more fully described in the Strategic Plan and One Year Action Plan chapters of the Consolidated Plan.

TDHCA continues to anticipate that funding levels will remain well below historic values, and recognizes a need for continued flexibility to be able to make funds available to parts of the state. Therefore, TDHCA is not proposing to return to a contract award model during fiscal year 2015; however, TDHCA has proposed targeting funding levels per activity in the One Year Action Plan Section of the Consolidated Plan, rather than combining funds into one pot of funds for all activities. TDHCA anticipates that this will increase the number of households that may be served per year.

Commenter	Organization	Format of Comments	Program
10. Judy Telge	Coastal Bend Center for Independent Living	Email submitted prior to public hearing	HOME

TDHCA Comment Summary:

Commenter encourages TDHCA to be mindful of the important role the HOME Program plays in meeting the needs of people with disabilities who wish to move from institutional settings to the community and to continue to live in the community. Commenter notes that changes in the administration of the TBRA vouchers is negatively impacting the number of individuals able to access this historically surefire way to transition to living in the community, thereby resulting in fewer individuals being relocated. The consequences of the reservation system were not anticipated; the burden on what was a successful Money Follows the Person collaborative effort is now keeping people in institutions.

TDHCA Response to Public Comment:

TDHCA has increased the amount of funding available for households with a member who is disabled over the past few years. In the past, TDHCA shifted HOME multifamily funds reserved under the PWD set-aside to single family PWD activities including rental assistance. TDHCA also dedicated deobligated and program income funds to the PWD set-aside during 2014, effectively doubling the state-mandated minimum allocation of 5% of the annual allocation. Finally, TDHCA specifically reserved deobligated

funds for the Money Follows the Person collaborative effort as part of a pilot program to gauge the need for HOME funds to be dedicated to this population in the future.

Commenter	Organization	Format of Comments	Program
11. Kyle Ingham	Panhandle RPC	Oral comment provided at public hearing; attachments provided	CDBG

TDA Comment Summary:

Mr. Ingham stated that application requirements that create barriers to entry, including pre-application work and annual applications, can be detrimental to very small communities. He also encouraged the agencies to be flexible and focus on benefitting people on the ground during project implementation.

Regarding the Disaster Relief program, Mr. Ingham sees logic in a one year implementation for drought projects, but does not agree that it is reasonable for projects related to wildfires, tornados, or hurricanes to be completed in a year.

TDA Response to Public Comment:

TDA has postponed changes to the Community Development Fund in order to allow further review and stakeholder input on scoring criteria for this fund. Stakeholders will be notified as opportunities for input are made available.

The Disaster Relief Fund is intended to repair or reconstruct infrastructure that is damaged or destroyed as a result of a natural disaster. Pre-agreement cost approval is available dating to the date of the disaster event, and preliminary work such as environmental review and engineering design may be completed while the application is being prepared and processed. This preparatory work would also ensure that the funded project is ready to proceed and address the disaster condition as soon as funding is made available.

TDA will consider the comments on flexibility in project implementation as the relevant program rules are reviewed.

Commenter	Organization	Format of Comments	Program
12. Gandolf Burrus	Grant Development Services	Oral comment provided at public hearing; attachments provided	CDBG

TDA Comment Summary:

Mr. Burrus stated that scoring criteria are needed for CDBG projects that address both need and project impact, and that do not rely on inaccurate census data. American Community Survey data is not an accurate reflection, particularly in small cities. Under the proposed state scoring, small communities would be at an extreme disadvantage in affording procurement, environmental, and engineering costs prior to the application. Small cities will not participate because they know they can't win and it costs too much to compete.

TDA Response to Public Comment:

TDA has postponed changes to the Community Development Fund in order to allow further review and stakeholder input on scoring criteria for this fund. Stakeholders will be notified as opportunities for input are made available.

Commenter	Organization	Format of Comments	Program
13. Katerina Dittmore	Grant Development Services	Oral comment provided at public hearing; attachments provided	CDBG

TDA Comment Summary:

Ms. Dittmore read a letter from the City Administrator of Cottonwood Shores, requesting no change to the biennial funding cycle and stating that the costs associated with preliminary engineering, environmental review, and comprehensive planning prior to the application are not affordable to the City. These proposed changes undermine the goal to develop viable communities. Ms. Dittmore also read a letter from the Commissioner of Agriculture that postponed any changes to the Community Development Fund.

TDA Response to Public Comment:

TDA has postponed changes to the Community Development Fund in order to allow further review and stakeholder input on scoring criteria for this fund. Stakeholders will be notified as opportunities for input are made available.



111 LOGSDON
ANDREWS, TEXAS 79714-6589
(432) 523-4820

July 14, 2014

Brooke Boston
Texas Department of Housing and Community Affairs
P O Box 13941
Austin, Texas 78711-3941

Dear Ms. Boston:

I am writing in reference to the 2015-2019 Consolidated Plan and the HOME Program Single-family Reservation Program. The HOME Housing Rehab Assistance program is very important to rural communities throughout the state and has been very beneficial to the City of Andrews.

The current system of funding is unsustainable. It is not possible to adequately plan when there is no way to tell how many homes will be funded at any given quarter. I strongly encourage TDHCA to return to the award of contracts, guaranteeing funding for a certain number of homes. To address expenditure concerns do not fund the contracts until 12-months after contract award.

Using this method would allow rural communities to benefit from the savings associated with economies of scale. It is very difficult to build a home within the budget proscribed by TDHCA. It is possible to stay in budget when a builder bids in such a way that he can have multiple homes under construction within a limited geographical area. The current reservation method is a gamble, making it difficult to get funding for more than a single house before the funds are gone.

In addition to my previously mentioned concern with the method of funding, I would like to see the Housing Rehab Assistance activity funded at a rate commensurate with demand.

I understand that money from TCAP repayments can be used to fund multifamily projects in place of multifamily HOME funds. Replacing the multifamily HOME funds with TCAP repayments will free up the previously set-aside HOME multifamily funds for use in HOME Housing Rehabilitation Assistance (HRA).

Increasing the funding for HOME HRA is in line with a recently published HUD report, "Measuring the Cost and Savings of Aging in Place". This report identifies the cost savings to both the individual and to the Federal Government if homeowners are allowed to age in place. The HOME Program, specifically the HRA activity, allows elderly to continue to live in homes that would otherwise be uninhabitable in the near future.

Thank you for your consideration in this matter.

Sincerely,

A handwritten signature in black ink that reads "Glen E. Hackler". The signature is written in a cursive style with a large initial 'G'.

Glen E. Hackler
Andrews City Manager

cc: Jennifer Molinari

MAYOR
Adrian DeLeon



308 West Pena Street
Carrizo Springs, TX 78834

CITY COUNCIL
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Juan Andres Sanchez
Johnny Patlan
Lydia Saenz

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CITY MANAGER
Gregory C. Howard, P.E.

CITY ATTORNEY
Rufino Cabello

July 10, 2014

Tim Irvine
Texas Department of Housing and Community Affairs
P O Box 13941
Austin, Texas 78711-3941

RE: 2015-2019 Consolidated Plan and HOME HRA

Dear Mr. Irvine:

Please accept these comments as you prepare the Consolidated Plan for 2015-2019. Our City has worked with the HOME Housing Rehab Assistance program over the past several years. Our citizens have directly benefitted from the HOME HRA Program, and we have seen the good that it can do for rural communities throughout our region.

We have worked with the HRA Program under the contract system and under the RSP system. Despite the hope that the RSP system would be more efficient in getting the funding out to communities, that has not been the case. I would like to encourage TDHCA to return to the award of contracts which guarantee funding for a specific number of homes.


I know that the agency had concerns about its expedient expenditure of funds under a contract system, but perhaps expenditure issues can be resolved by issuing contracts that are funded twelve months into the future. In that way, funds are not encumbered on your end while we go through the lengthy application and qualification processes on our end, but it also leaves neither applicants nor cities waiting in limbo regarding the availability of funds.

Another benefit of the contract system is that it allows us to work more effectively with our building contractors. We can offer a slate of homes ready to be built at the same time rather than one or two homes funded sporadically as is the result under the RSP system. The contract system allows the builders to give us their best possible price when bidding on our homes because economies of scale are at work.

I would also like to see more funds put into the HOME HRA Single Family activity. Currently, in our community, demand far outstrips the supply of available funding. In my experience, multifamily activities do not work as well in rural communities as do single-family activities. If the agency were to fund multifamily projects with TCAP repayments and convert those HOME funds previously set aside for such multifamily projects into single-family HRA assistance, then rural cities and counties would benefit significantly from having more funds targeted to their specific needs.

I appreciate your assistance and look forward to working with the HOME Program in the future.

Sincerely,


Gregory Howard
Interim City Manager

cc: Jennifer Molinari



THE CITY OF FORT STOCKTON, TEXAS

MAYOR
WILLIAM C. LANNOM

CITY MANAGER
RAUL B. RODRIGUEZ

CITY SECRETARY
DELMA A. GONZALEZ

P.O. BOX 1000
121 WEST SECOND STREET
FORT STOCKTON, TEXAS 79735
PHONE 432-336-8525
FAX 432-336-6273

July 10, 2014

Brooke Boston
Texas Department of Housing and Community Affairs
P O Box 13941
Austin, Texas 78711-3941

Dear Ms. Boston:

I am writing regarding the upcoming Consolidated Plan and the HOME Program Single-family Reservation Program. I have serious concerns about the current RSP system, specifically the agency's ability to disburse HOME funds expediently in this manner and the burdens it creates for rural cities and counties. The HOME Department is well-run, and we enjoy working with its staff, but we believe the RSP System itself has outlived its ability to function effectively despite efforts from the department.

Among the problems are the rush created when funding is released and the requirements to pay up-front for house-specific services such as appraisals – even when reimbursement cannot be sought if the house remains unfunded. As you are aware - the first round of 2014 funding ended in less than 90 seconds. The second round crashed the agency's servers, and no households were funded at that time.

I understand there will be another attempt to release funds in late summer or early fall, but that doesn't resolve the issue that many communities paid for appraisals months ago out of limited budgets. So, I would request that the rules be changed to allow for appraisals to be obtained and submitted following the submission and acceptance of a set-up rather than prior to it.

Also, I would like to see TDHCA bring back contracts to resolve some of the problems created by the RSP system. If this is not possible, please then allow us the ability to submit set-ups as they are ready, before funding is actually released. The agency could simply fund households in the order set-ups are submitted, thereby avoiding the rush to get funded each time HOME RSP dollars are released.

In regard to funding itself: as I understand it, TCAP repayment funds can be used to fund multifamily projects in place of Multifamily HOME funds. I would request that this be done in order to make HOME multifamily funds available for use in the Single-family HOME activity.

COUNCIL MEMBERS:

ALLAN CHILDS
BILLY JACKSON

DARREN A. HODGES

JOE CHRIS ALEXANDER
DINO RAMIREZ



THE CITY OF FORT STOCKTON, TEXAS

MAYOR
WILLIAM C. LANNOM

CITY MANAGER
RAUL B. RODRIGUEZ

CITY SECRETARY
DELMA A. GONZALEZ

P.O. BOX 1000
121 WEST SECOND STREET
FORT STOCKTON, TEXAS 79735
PHONE 432-336-8525
FAX 432-336-6273

Our community has participated in this program for many years. In our rural communities, safe single-family housing improves the lives of homeowners, neighborhoods, and the community as a whole much more so than multifamily rental units. This seems to be the case throughout much of rural Texas; therefore, increasing the funding for single-family housing is the preferred method for addressing our needs.

Sincerely,

Raul Rodriguez
City Manager

cc: Jennifer Molinari

COUNCIL MEMBERS:

ALLAN CHILDS
BILLY JACKSON

DARREN A. HODGES

JOE CHRIS ALEXANDER
DINO RAMIREZ



Terry Simpson

County Judge
Room 109
400 West. Sinton St. Rm. 109
Sinton, Texas 78387
Office: 361/364-9301

July 14, 2014

Texas Department of Housing and Community Affairs
P O Box 13941
Austin, Texas 78711-3941

Re: 2015-2019 Consolidated Plan

Mr. Tim Irvine:

I am writing to express my concern about the lack of funds in the HOME Reservation Program. It is my understanding that TCAP repayment funds could be used in place of Multi-family HOME funds; freeing up those funds to be moved into the Single Family HOME Program.

The Single Family HOME Program is perhaps the best program your agency offers. Our County has participated for many years, and we are in the process of participating again. Safe Single family housing not only impacts the resident, but the entire County.

However, because of the limited budget, it is not realistic to think a family can be assisted if only one household is funded. There must be enough funding in the program to ensure all of the eligible households are assisted. If only one submission is approved, finding a builder to perform the work within the given budget is just not practical. Currently we have a waiting list of eligible applicants and I am very concerned about the ability to provide them with the assistance they need.

I strongly urge you to do whatever is necessary put adequate funding in the HOME Reservation Program to make this program work.

In addition to expanded funding, I support the suggestion of allowing homes to be submitted for set-up as they are ready. The Department can then fund by the date of submission, making it a truly first-complete, first-served program. If a submitted set-up is missing the title commitment it should be thrown out by the Department, thus moving to the bottom of the list once the title commitment has been received.

Sincerely,

A handwritten signature in black ink, appearing to read "Terry Simpson".

Terry Simpson
San Patricio County Judge

cc: Jennifer Molinari



PO Box 431 • Trinity, Texas 75862-0431
Phone 936/594-2507 • Fax 936/594-8364 • E-mail cityoftrinity@valornet.com

Mayor
Billy Joe Slaughter

Mayor Pro-Tem
Wayne Huffman

Councilmembers
Chris Dennis
Clegg DeWalt
Billy Goodin

City Manager
Buddy Drake

Public Works Director
Shannon Rowe

Fire Chief
Hayne Huffman

Fire Marshall
Billy Joe Slaughter

Municipal Judge
Bobby Nichols

Police Chief
Steven Jones

July 10, 2014

Texas Department of Housing and Community Affairs
P O Box 13941
Austin, Texas 78711-3941

To Whom It May Concern:

I am writing regarding the upcoming Consolidated Plan and the HOME Program Single-family Reservation Program.

The manner in which the Reservation System is being funded makes it very difficult to plan and budget. Under current rules we must submit an appraisal with the set-up. This must be paid for out of local funds yet there is no assurance that the household will be accepted for assistance. The first round of 2014 funding ended in a minute and the second round caused such a frenzy that the Department's servers crashed and no households were funded. I understand there will be another attempt to release funds in August or September, but that does not negate the fact that local governments paid for appraisals months ago.

Rural Texas communities such as ours do not have large budgets and having to pay for appraisals prior to set-up is very burdensome; therefore, I request that TDHCA allow appraisals to be provided after the set-up has been submitted and accepted. In addition, I request that TDHCA either bring back contracts or allow Administrators to submit set-ups as they are ready, prior to the release of funding. TDHCA could simply fund households in the order set-ups are submitted.

In regard to funding, it is my understanding that TCAP repayment funds could be used to fund multifamily projects in place of Multifamily HOME funds. This would free up HOME multifamily funds for use in the Single-family HOME activity.

The Single-family HOME Activity is the best use of housing funds for rural communities. Many areas cannot support rental units but all have substandard owner-occupied homes. Allowing residents to remain in their homes helps to preserve communities. Our community has participated in this program for many years. Safe Single family housing improves the lives of homeowners, neighborhoods, and the community as a whole.

The Single-family HOME Program is currently being administered by the Department in a manner better than I can recall from our history with the program. This is a great advance for the Department and for the citizens of Texas. However, better program management has helped drive up demand for Single-family HOME funds. Using TCAP repayments for multifamily funding and transferring the multifamily HOME funds to single-family will be very beneficial for all of rural Texas.

Sincerely

Billy Slaughter
Mayor, City of Trinity

cc: Jennifer Molinari

City of Wolfe City

101 W. Main / P.O. Box 106
Wolfe City, TX 75496
Phone (903) 496-2251
Fax (903) 496-2335

July 14, 2014

Texas Department of Housing and Community Affairs
P O Box 13941
Austin, Texas 78711-3941

re: 2015-2019 Consolidated Plan

To Whom It May Concern:

I am writing to express my opinion regarding the lack of funds in the HOME Reservation Program. The Single Family HOME Program is perhaps the best program TDHCA offers for rural Texas. Our City has participated successfully for quite some time. Safe single family housing not only improves life for the assisted family, but the entire community as well. I strongly urge you to do whatever is necessary put adequate funding in the HOME Reservation Program to make it work.

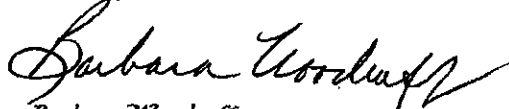
As I stated above, it seems that there is adequate money in the HOME HRA Program to meet the needs of rural cities and counties. It is my understanding that TEAP repayment funds could be used in place of Multi-family HOME funds, freeing up those funds to be moved into the Single Family HOME Program. I would request that this type of arrangement be seriously considered by TDHCA.

The budget and implementation limitations of the HOME RSP Program are making it very difficult to participate effectively. If only one household is funded, the program does not work well. There must be enough funding in the program to ensure most or all of the eligible households are assisted. Under the current RSP system, if only one submission is approved, it is difficult or impossible to find a builder to do that work within the HOME HRA budget.

In addition to expanded funding, I support allowing homes to be submitted for set-up as they are ready, rather than having to wait until funding is available in the system. The Department can then fund by the date of submission, making it a truly first-complete, first-served program - something that is not a reality under the current RSP system. To prevent abuse, if a submitted set-up is missing the title commitment it should be thrown out by the Department, thus moving that set-up to the bottom of the list once the title commitment has been received.

I appreciate your consideration of my comments. Thank you.

Sincerely,



Barbara Woodruff
Mayor, Wolfe City

cc: Jennifer Molinari



Grant Development Services

P.O. Box 33043 Austin, Texas 78764
(512) 707-0455 Fax (512) 707-7211

7-22-14

Texas Department of Housing and Community Affairs
Housing Resource Center
Box 13941 Austin, Texas 78711

Re: Public hearing for State of Texas Consolidated Plan

My name is Gandolf Burrus owner of Grant Development Services (GDS) a consulting firm that focuses on small rural communities. We are submitting additional comment

We are offering the following comments on the inadequacies of the current CDBG scoring criteria. We consistently advocate for scoring criteria that will enable the COG RRC to fairly evaluate both the level of NEED and the proposed IMPACT for each proposed CDBG project.

Through the years we have used one example to illustrate the necessity for NEED and IMPACT scoring in the process to enable the COG RRC to come to a fair and reasonable scoring and award.

Imagine there are two cities located in a COG RRC area. Both have 1,500 persons.

- City One has a single failing well, is under TCEQ enforcement and is in danger of losing its only source of water for the entire city. The entire city is impacted
- City Two has a new well, a new storage facility and only needs to loop water lines to increase pressure in one fourth of the City. Only $\frac{1}{4}$ of the city is impacted

One would think that it is very clear that City One has a far greater NEED for grant assistance. It should also be clear that a project that saves a single water source that benefits the entire city will experience a far great IMPACT on the lives of its residents than City Two's water pressure improvement project that only benefits $\frac{1}{4}$ of the City. Please consider the above example of City One and City two and ask yourself on each criteria "how will TDA scoring criteria help me differentiate which city NEEDS the project the most and which city will receive the most IMPACT from the project. The following is a list of TDA criteria:

1. Prioritized Activities (i.e. is it a water project or a sewer project)
2. Per Capita Income
3. Poverty rate

4. Unemployment Rate
 5. Water Sewer rates for 5,000 gallons
 6. Tax Rates (property and ad valorem)
 7. Number of previous grants
 8. Match commitment
-

Our analysis of the inadequacies in the TDA criteria follows:

Criteria 1 (water or sewer) and Criteria 8 (match amount) result in all applicants receiving the same score, therefore they are only a threshold, not a differentiator. In criteria 1, EVERYONE applies for either water or sewer thus everyone receives the same score on this criteria. In criteria 8, EVERYONE provides the required match amount and thus everyone gets the same score. Criteria 1 and 8 should be threshold requirements. As scoring factors they are of no value. 25% of the TDA proposed COG RRC scoring has NO MEANING

Criteria 2, 3 and 4: are derived from the census. They are easy to secure and can be compared easily. But what do they have to do with determining whether City One or City Two should fund. None of those criteria have anything to do with either water or sewer systems. These criteria have traditionally been used only as tiebreakers in scoring systems that used other more valid criteria to do the initial scoring

Criteria 5: is as carry over that most COG RRCs traditionally use. Comparison of city utility rates is the first valid criteria in the new rules. It could be improved by asking when the last rate increase was implemented and scoring accordingly

Criteria 6: Tax Rates (property and ad valorem) are also valid criteria and they have traditionally been used by most COG RRCs. However, more information is needed to make them actually useful. A city with a very high tax rate with a low collection rate should not rate any better than a city with a lower rate by a significantly higher collection rate.

Criteria 7: Number of previous grants Again, most COG RRCs traditionally use this criteria to try to see that it is not the same cities funding over and over again while other get nothing. This is also a valid criteria.


Problems with current criteria

- Much of the criteria is based on census data- which may be consistent, but is NOT accurate or reflective of small rural communities because is only based on statistical sampling, not based on actual data
- These changes will skew the program awards to larger communities, not small, rural communities
- These changes will DISCOURAGE participation by small, rural communities
- These criteria do not address the most needed projects, but will score incremental improvements in the quality of life just as needy as project

that address significant, immediate problems. Eg, replacement of an existing 2 " water line will be scored just as highly as a citywide failing wastewater treatment plant

In summary, our twenty eight years of experience with the Texas CDBG program lead us to conclude that scoring criteria should be focused on determining the Need for a project and the Impact that the project will have on the community. Census data is useful as a "Tiebreaker" but should not be used as a scoring criteria when making funding decisions

Respectfully Submitted



Gandolf Burrus
President, Grant Development Services
Box 33043 Austin Texas 78764



Grant Development Services

P.O. Box 33043 Austin, Texas 78764
(512) 707-0455 Fax (512) 707-7211

7-22-14

Texas Department of Housing and Community Affairs
Housing Resource Center
Box 13941
Austin, Texas 78711

Re: Public Hearing for State of Texas Consolidated Plan
Community Development Block Grant Program

My name is Gandolf Burrus, owner of Grant Development Services (GDS) a consulting firm that focuses on small rural communities. We have over 28 years' experience working with the state agencies that have administered the CDBG program and the area Councils of Governments. We regard ourselves as strong supporters of the CDBG program.

In response to the notice for this public hearing which stated that stakeholder views were requested on "community development needs", we respectfully submit the following comments.

The broad community development needs including access to basic services such as water, sewer, and housing are easy to define. Where the CDBG program is deficient is in the development of scoring criteria that to fairly and meaningfully evaluate both the level of NEED and the proposed IMPACT for each proposed CDBG project as scoring criteria.

We are concerned that TDA is moving toward a revised scoring criteria that is a step backwards. The program would be rendered ineffective if this revised criteria were to have NO scoring items that evaluate the NEEDS being presented and NO scoring items that evaluate the IMPACT the project would have if funded. If TDA implements revised rules that rely simply on inaccurate census data to score projects on criteria such as community distress, poverty this would have little or no value in actually identifying either NEED or IMPACT of specific projects.

In the event that TDA moves toward the America Community Survey (ACS) census data, this will produce an inaccurate accounting of poverty and community distress. In the past TDA has appealed to HUD regarding inaccuracies in census data and even secured approval to substitute data for the purpose of documenting project beneficiaries.

The ACS does not rely on actual contact surveys as did the older forms of census. The ACS interviews a small sample and then, from that small sample, projects data for the entire census area. For small,

rural communities, the reliance in statistical sampling is extremely problematic. Making statistical projections based on a small number of samples in a small community can result in wildly inaccurate projections. For example, a small city has its ACS numbers generated from an interview pool of less than 10% of the region. It is easy to see how distress factors can be inaccurately reported. Mayors of small communities can easily vouch for how poorly the ACS represents their cities.

~~The CDBG scoring criteria should never be focused only on making the CDBG applications easier for the staff to score, at the expense of measuring NEED and IMPACT. Need and impact are the required values which enable TDA to better serve the mission of the CDBG Program.~~

TDA scoring should not rely on a few demographic items such as poverty rate and community distress solely because those numbers can be easily secured from census data. We understand that census based criteria are easier to score, but is ease of scoring really worth abandoning all of the other traditional COG RRC scoring criteria that enable each COG RRC to sort out who most NEEDS a project and who will most benefit from the IMPACT created.

TDA's "state portion" of the CDBG scoring criteria provides no IMPACT or NEED scoring. In the event that TDA decided to award points to communities with additional resources as I will explain, small communities would be significantly disadvantaged. Specifically, if cities are rewarded for expending significant funds on a project before a project is even evaluated and awarded. Examples of such shovel ready actions are-(1) paying for the completion a master plan that includes the proposed project, (2) paying to complete advertising and procurement of both engineering and administration services, (3) paying for a completed an environmental assessment and (4) paying for preliminary engineering on the project. This kind of focus slams the door closed for small, disadvantaged communities. Hundreds of small Texas communities would not be able to compete and receive funding.

One only has to look at the out of pocket costs for a city to complete all four proposed criteria, to realize that this will virtually eliminate small rural economically distressed communities from competing in the CDBG program successfully. The cost to a small city to prepare an application that meets the above 4 criteria far exceeds the 5% cash match small communities are required to provide. A small community cannot risk the expense and time required to fulfill the criteria for projects that have little chance to receive funding.

Over time, we feel that small communities will simply have to drop out of the program because they cannot afford to compete with the larger more affluent communities. The CDBG program is not intended to prioritize larger, more affluent communities.

In summary, our comment is that the scoring criteria to be implemented by the Texas Department of Agriculture should always address Need and Impact. We recommend that TDA should never rely primarily on census based criteria. TDA reduce census based criteria and instead emphasize criteria that specifically address Need and Impact such as the following:

- Criteria that evaluates the number of people who will benefit from a project.
- Criteria that differentiates between a projects with city wide benefit vs. only a small target area project.
- Criteria that recognizes saving a single water source or rehabbing a failing sewer treatment facility has more value that a water line replacement or looping project.
- Criteria that measures the cost per beneficiary efficiency of the proposed project.
- A criteria that recognizes that a system that is under TCEQ orders is more in need than a city that that is submitting a discretionary project such as looping
- A criteria that directly addresses drought
- A criteria that rewards the provision of first time services to residences without either municipal water or sewer.
- Criteria that award additional points for acquisition or protection of water sources

Respectfully submitted:

J Gandolf Burrus
President, Grant Development Services
Box 33043
Austin, Texas 78734
512 707-0455

CITY OF COTTONWOOD SHORES
3808 Cottonwood Drive, Cottonwood Shores, Texas 78657

Mayor: Donald Orr
Mayor Pro-Tem: Stephen Sherry
Councilmember: Tony Satsky



Councilmember: Cheri Trinidad
Councilmember: Marley Porter
Councilmember: Roger L. Wayson

"People, Parks and Prosperity"

Texas Department of Agriculture
PO Box 12847
Austin, TX 78711-2847

Dear Commissioner Staples:

The Texas Community Development Block Grant Program (TXCDBG), now a part of TDA, has long been a reliable resource for small rural communities in Texas that often struggle to provide basic services for our residents. It has come to our attention that the TxCDBG program staff has proposed significant changes to the 2015 Texas CDBG Action Plan that will have negative impacts upon our participation in the program.

1. The biennial funding cycle has been successful for many years and should not be changed. A single-year funding cycle will place greater administrative and financial burdens on us without improving our chances of funding. A single year application cycle will double the number of expensive notices, public hearings and meetings, engineering estimates, mapping, income surveys and application writing work for hundreds of Texas Communities including us.
2. The proposal to award points to applicants that have completed preliminary engineering and/or environmental review is not affordable for our community. We would have to procure an engineer and/or grant administrator to prepare these items and estimate these costs to be upwards of \$25,000. If we are not funded, those out-of-pocket expenses would be wasted since we cannot afford to implement our projects without the grant award. This also reinforces the need to maintain the biennial funding cycle.
3. TDA has proposed that points be awarded to projects included in a Comprehensive Plan. Planning studies of any kind and regular updates to them are expensive and not often funded by grants. We believe that the Community Needs Assessment in our application adequately describes the priorities of our community. We can demonstrate this by including the community needs in the resolution that authorizes our TxCDBG application, thereby taking official action demonstrating we have considered our project priorities and informed the public.

I appreciate your serious consideration of these comments prior to the release of the draft Action Plan. We rely on the TxCDBG program to improve our community and are deeply concerned that making these changes will undermine TDA's goal to develop viable communities, principally for persons of low-to-moderate income.

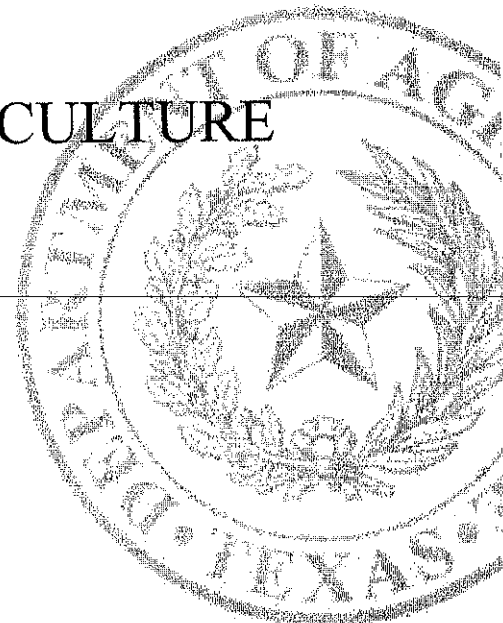
Sincerely,


City Administrator/City Secretary

CC: State Senator Troy Fraser
State Representative Marsha Farney

TEXAS DEPARTMENT OF AGRICULTURE

TODD STAPLES
COMMISSIONER



July 3, 2014

Dear Stakeholders:

As you know, the Texas Department of Agriculture (TDA) recently proposed changes to the Community Development Block Grant program. Following the two teleconferences TDA convened to discuss these proposed changes, we received a number of questions and comments concerning the proposal.

After speaking with a variety of stakeholders, it is clear we do not have enough time to have the level of discussion I believe we need for certain items while the Regional Review Committee hearings are being conducted. Therefore, I have asked my staff to postpone consideration of the proposed changes as they relate to the application cycle and the scoring criteria. We will be scheduling additional conference calls and other outreach efforts to further discuss these issues with you for future application cycles.

This means we will take applications for the 2015-2016 application cycle using the same process to establish scoring criteria as was utilized in 2013-2014.

As a result of these changes we are updating our proposed 2015 Action Plan and proposed rule changes now and will have those available for public comment and discussion very soon. Additionally, I have also asked TDA staff to provide you with a revised summary of the program changes with which we will move forward for consideration and an updated timeline for the 2015 program year. We will actively engage you in this process.

Thank you for your input into this important process. Our team here at TDA is committed to ensuring any program modifications are fully and thoughtfully discussed, and result in positive changes for our stakeholders and the Texas economy.

Sincerely,

A handwritten signature in black ink that reads "Todd Staples". The signature is written in a cursive, slightly slanted style.

Todd Staples





Texas Department of Housing and Community Affairs
Housing Resource Center
P.O. Box 13941
Austin, TX 78711-3941

RE: July 23, 2014 Public Hearing for State of Texas Consolidated Plan

To Whom It May Concern,

As an entity established under Chapter 391 of the Texas Local Government Code the Panhandle Regional Planning Commission (PRPC) has the opportunity to serve 63 rural municipalities and 26 counties (24 of which are defined as rural) in the Texas Panhandle. In this capacity we have worked with programs from the U.S. Department of Housing and Urban Development (HUD) for over 30 years, and in this time we have been fortunate to administer over 300 projects funded from this source for the rural communities that we work for. We thank you for the opportunity to comment on these HUD programs as they have proven to be the lifeblood in keeping services functioning in many rural communities in our region. Many of the municipalities that we serve operate on total annual budgets of less than \$100,000 per year and plan for many years to pursue Community Development Block Grant (CDBG) funding for infrastructure that is a necessity to meet the needs of low-to-moderate income families. It is highly important to very small and impoverished communities that barriers not be established that hinder or prevent access to the CDBG program that in many instances is the only way for them to maintain livable housing conditions. Please note that concepts that might not be barriers to rural communities of 20,000+ with multi-million dollar budgets may end up being tremendous barriers to communities of 200 with annual budgets of less than \$100,000.

Some of the concepts that have been discussed in recent months related to future applications to the CDBG programs would establish barriers to entry into the CDBG program for very rural and impoverished communities. The concepts of annual application cycles and scoring that rewards pre-application expenditures will effectively eliminate the most rural and impoverished communities that do not have the staff to develop applications each year or the money to pay for preliminary engineering or environmental work. We are very appreciative that these concepts were not applied to the current application cycle, but we feel that it is our responsibility to ensure that the concerns with these concepts be included in the public record related to the program because they are not favorable to the very communities who need the CDBG program the most. For further detail of these concerns please see attached letter from PRPC Board of Directors Chairman Tom Velasquez to TDA dated June 5, 2014.

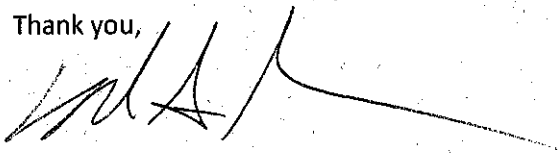
It is also important to note that as the State of Texas 2015-2019 Consolidated Plan is being developed the implementation on a local level of each of the programs be considered. We work with many federal and state agencies and are highly aware of the importance of accountability, accurate reporting, and fiscal responsibility. However, it is important to remember that on the local level getting projects implemented for actual people, people in challenging life situations largely, is the purpose of the

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program. To the extent practicable, please consider options that allow for flexibility to modify projects easily as things change throughout implementation, expedited payments to contractors as work moves quicker when they are paid faster, and reasonableness in extending contracts if state agencies outside of those associated with HUD programs can't get permits approved quickly. We understand that it is a fine balance in maintaining accountability and ensuring HUD guidelines are met while being flexible and practical in implementing these projects. However, to the extent possible please consider the communities, families, and individuals receiving program benefits as primary stakeholders as rules and policies are developed for the next five years. These programs are key to the future success of rural communities in the State of Texas, so please carefully consider any modifications that can create barriers to entry on the application side or that make implementation so cumbersome that it is not possible for rural communities to successfully complete them. PRPC Staff is available to discuss any concepts or considerations related to these programs at any point in the development of The Plan. Thank you again for the opportunity to provide comment on such an important program.

Thank you,

A handwritten signature in black ink, appearing to read 'K. Ingham', with a long horizontal flourish extending to the right.

Kyle G. Ingham
Local Government Services Director

June 5, 2014

Commissioner Todd Staples
Texas Commissioner of Agriculture
Texas Department of Agriculture
P.O. Box 12847
Austin, TX 78711-2847

RE: TDA Proposed Modifications to the TxCDBG Program and Action Plan

Dear Commissioner Staples:

The Cities and Counties of the Texas Panhandle are very appreciative of the Texas Department of Agriculture and all that you and your staff do for rural areas of the State. One of the most important programs to our region is the Texas Community Development Block Grant (TxCDBG) program as it has been the primary funding source for the last 30 years for the majority of public infrastructure improvements in the smallest, most impoverished, and most rural communities of our region. The webinars your agency has hosted related to recommended changes to the TxCDBG program over the last two weeks have been watched carefully by our communities in this region and we appreciate the opportunity to comment on these changes as proposed. As a representative of the PRPC Board of Directors, representing many very rural and disadvantaged communities, we firmly believe that the changes as proposed will create significant barriers to entry on the TxCDBG program for the very communities that need it the most as this program was originally intended. The primary concerns for our region are as follows:

1. The proposed annual application cycle will double the work and costs associated with applying for funding without any additional funds being allocated to the region to justify the additional costs and work. The concern raised during the webinar that the needs of a community change from year to year is not applicable in rural areas of the State as there is a continual long list of needs that go unmet in rural communities every year due to lack of funds. The leaders of those communities are quite aware of what the most important need to the community is for many years and struggle to find resources to meet those needs for their citizens. A number of years ago, the TxCDBG program was on an annual cycle, but it was taken to a two year cycle for the simple fact that the annual cycle was cumbersome and put communities in a continuous state of application with no real benefit to show for it. There are virtually no benefits, and significant detriments, of going to an annual application cycle to low-to-moderate income and small communities.
2. The "Readiness Criteria" that are being proposed create a direct barrier to access on the program for small and economically disadvantaged communities.

One of the three primary national objectives for the program is "activities benefitting low-to-moderate income persons". We are highly concerned that this focus on having projects engineered, environmentally cleared, and included in comprehensive plans will functionally eliminate applications from communities that cannot afford to have these activities done prior to application. While the proposal does not require these activities, it is very evident that applications that do not include these elements will not be scored in the funding range. It is highly impractical to expect communities with an annual budget of \$50,000 to expend \$15,000 or more annually, or even just once, just to have a chance at being funded under the TxCDBG program. The desire to have projects that are more ready for implementation in order to expedite contract periods is admirable, but unfortunately it effectively eliminates the very applicants that need these funded projects the most and likely violates the fundamental premise upon which the program is built.

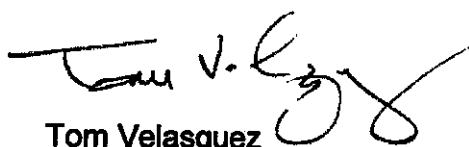
3. Cutting the contract period for Disaster Relief projects does not benefit the communities that are in dire need of Disaster Relief assistance. Fortunately, many disaster relief projects are implemented in less than a year currently in our region. However, hamstringing a community with a 12 month drop dead date does not take into consideration environmental factors, potential permitting issues, and the general fact that disasters create chaos and unforeseen challenges by definition. The absolute worst thing that could happen to a community that is implementing a Disaster Relief project would be finding themselves in a situation of being required to pay back \$350,000 of much needed assistance because things beyond their control did not go as expected as is the case often in a disaster situation. While it would be great if Disaster Relief projects could be funded and implemented within a 12 month time period, a requirement of this nature would be setting grant recipients up for failure at a time that they most need grace and assistance. The last thing a community recovering from a tornado, fire, or hurricane (or a community trying to get much needed water to its citizens) needs to be focused on is whether the assistance they received from the State will be in place or not due to bureaucratic scheduling concerns.
4. It is highly unfortunate and generally worrisome that these programmatic changes are being considered at this time in the application process. Communities have spent two years preparing for this application cycle under the assumption that the established program will remain relatively stable and in the hands of their Regional Review Committee. Some communities have raised taxes and utility rates explicitly for the purpose of improving their competitiveness for the TxCDBG program. Concerns are being raised as to whether these actions were taken irresponsibly given the proposed changes to the program. If the application parameters can be arbitrarily changed at the last minute there is an appearance of a lack of stability in the program. Further, we are quite concerned that the Regional Review Committee (RRC) for our region will be charged with making scoring decisions based on proposed rule changes from TDA that have yet to be presented at this time and will at best only be in a proposed stage at the time of the RRC meeting. It seems highly presumptive and potentially disingenuous to the public comment process to provide scoring and application guidance to the region's communities based on proposed rules that are yet to be adopted. We assume that TDA intends to be responsive to public comments regarding the Action Plan received during that required

process, so it is concerning that things could change significantly after the RRC meets. These types of broad changes should be considered with extensive input from all stakeholder groups over a period of several months and approved well before an application period, and they should not be considered after an application period was to begin in a rushed manner with approval coming well after the Regional Review Committees from around the State meet.

5. For the Texas Panhandle it is highly important that any considered changes to the TxCDBG program be aimed at making it easier for low income and very rural communities to have equitable or greater access to the funds and that these changes be considered in a time period where public and stakeholder input can be meaningfully considered prior to implementation. Expediting administrative processes and the implementation of projects is a high priority for the State of Texas and this region, but it should not be done at the expense of the intent and spirit of the program. The general nature and timing of these proposed changes appear to create a significantly negative environment for the vast majority of potential applicants in this region.

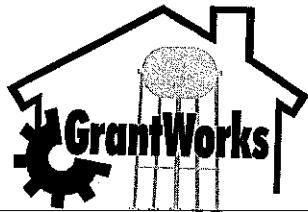
In most Texas Panhandle communities almost every water or sewer system project that has been implemented over the past 30 years has largely been sourced from the TxCDBG program. The communities that have the greatest need for these projects often have annual budgets under \$100,000 and populations that are very elderly and/or impoverished with no capacity to generate the funds required to do large infrastructure projects. The proposed changes, including the annual application cycle and the readiness scoring criteria, will effectively eliminate these communities from being able to access the program. Again, we appreciate all that the Texas Department of Agriculture does, but in regards to the proposed changes to the TxCDBG program it is important that you be made aware of the detrimental impacts that they will have on small, rural communities. We sincerely appreciate your time in reviewing this correspondence and thank you for your attention to this matter. If you have any questions or want to discuss this topic please contact me or my PRPC Staff at (806) 372-3381.

Thank you,



Tom Velasquez
Chairman, PRPC Board of Directors
Citizens Representative, Wheeler

cc: Rick Rhoades, Administrator for Office of Rural Affairs, Texas Department of Agriculture
Suzanne Barnard, Director of TxCDBG, Texas Department of Agriculture
Matt Williams, Field Representative, Texas Department of Agriculture
Gary Pitner, Executive Director, Panhandle Regional Planning Commission



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*Planning, Housing, and
Community Development Services
for Rural Texas Since 1979*

July 23, 2014

Texas Department of Housing and Community Affairs
P O Box 13941
Austin, Texas 78711-3941

Re: Draft Consolidated Plan

To Whom It May Concern:

We would like to make comments in reference to the 2015-2019 Consolidated Plan and the HOME Program Single-family Reservation Program. The HOME Housing Rehab Assistance program is very important to rural communities throughout the state and has been very beneficial to both those communities and their citizens.

We encourage TDHCA to return to the award of contracts, guaranteeing funding for a certain number of homes. The expenditure concerns can be addressed by not funding the contracts until 12-months after contract award. At the 12-month period give Administrators 3-months to setup up to 5 homes. After month 15 put any remaining funds in a reservation fund and allow Administrators with 5 homes committed to setup an additional 2 homes, after month 16 allow Administrators to setup up to 10 homes. This will allow Administrators with greater demand to access additional funds.

The current system of funding is unsustainable. It is not possible to adequately plan when there is no way to tell how many homes will be funded at any given quarter.

Using the above method will allow rural communities to benefit from the savings associated with economies of scale. It is very difficult to build a home within the budget proscribed by TDHCA. It is possible to stay in budget when a builder bids in such a way that they can have multiple homes under construction within a limited geographical area. The current reservation method is a gamble, making it difficult to get funding for more than a single house before the funds are gone.

In addition to our previously mentioned concern with the method of funding, we would like to see the Housing Rehab Assistance activity funded at a rate commensurate with demand.

We understand from the Single Family Roundtable held last April that money from TCAP repayments can be used to fund multifamily projects in place of multifamily HOME funds. Replacing the multifamily HOME funds with TCAP repayments will free up the previously set-aside HOME multifamily funds for use in HOME Housing Rehabilitation Assistance (HRA).

Increasing the funding for HOME HRA is in line with a recently published HUD report, "Measuring the Cost and Savings of Aging in Place". This report identifies the cost savings to both the individual and to the Federal Government if homeowners are allowed to age in place. The HOME Program, specifically the HRA activity, allows elderly to continue to live in homes that would otherwise be uninhabitable in the near future.

Thank you for your consideration in this matter.

Sincerely,



Donna M. Johnson
HOME Program Director
GrantWorks, Inc.



C. Morris "Tres" Davis III
V.P. GrantWorks, Inc.

TEXAS DEPARTMENT OF HOUSING AND COMMUNITY AFFAIRS

DRAFT STATE OF TEXAS
2015-2019 CONSOLIDATED PLAN

PUBLIC HEARING

Room 1-100
William B. Travis Building
1701 North Congress
Austin, Texas

2:08 p.m
Wednesday,
July 23, 2014

PRESIDING: Elizabeth Yevich, Manager
TDHCA Housing Resource Center

ON THE RECORD REPORTING
(512) 450-0342

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I N D E X

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P R O C E E D I N G S

1
2 MS. YEVICH: Good afternoon. Today is Tuesday,
3 July 23, 2014, and we are here in the William B. Travis
4 Building, 1700 North Congress. And it's about 1:08 p.m.
5 So, welcome to this public hearing here in Austin on the
6 development of the 2015-2019 State of Texas Consolidated
7 Plan, also known as the Plan.

8 This hearing is an opportunity to obtain views
9 of citizens on housing and community development needs
10 prior to the release of the draft of this plan.

11 Some administrative reminders: Please, if you
12 haven't already done so, turn off your cell phones.
13 There's witness affirmation forms in the back, so if
14 you're going to speak, we ask that you please fill out a
15 witness affirmation form first. Also, we want to make
16 sure that everyone in the room has signed in the sign-in
17 sheet.

18 And as a reminder, we are here to accept public
19 comment, and we are not able to respond to any questions
20 today. This is just a public hearing.

21 I will introduce each topic and ask for
22 commenters to come forward. And at that time you may give
23 your views on housing and community development needs for
24 the development of this plan.

25 If you would like to submit written comment or

1 do written comment along with your public comment today,
2 at a later time, please taken an information sheet also
3 located at the back table, with written submission
4 details.

5 Some background on this: The Texas Department
6 of Housing and Community Affairs, known as TDHCA,
7 coordinates the preparation of this plan, which is the
8 2015-2019 State of Texas Consolidated Plan, along with the
9 Texas Department of Agriculture. And with us today we
10 have Suzanne Barnard, with TDA. We also coordinate with
11 the Department of State Health Services, and we have
12 Michelle Berkhoff here with that department, DSHS.

13 And TDA is responsible for the Community
14 Development Block Grant portion, and DSHS is responsible
15 for the HOPWA portion. This plan is then submitted to
16 HUD, and it's required to be submitted, and it is turned
17 in officially -- I believe it is December 10 -- around the
18 middle of December.

19 So the plan requires the State's administration
20 of these four programs. I just mentioned two, but the
21 four programs, again, are the Community Development Block
22 Grant program, Housing Opportunities for Persons with
23 AIDS, known as HOPWA, and the Emergency Solutions Grants
24 program, known as ESG, and Home Investment Partnerships
25 Program, known as HOME, administered by TDHCA. And we

1 have Jennifer Molinari here with TDHCA, representing the
2 HOME program.

3 So some background on each of these programs.
4 The Community Development Block Grant, under that are the
5 CDBG program. Assistance is available to non-entitlement
6 general purpose units of local government, including
7 cities and counties that are not participating or
8 designated as eligible to participate in the entitlement
9 portion of the federal CDBG program.

10 HOPWA, the Texas Department of State Health
11 Services addresses the housing needs of people with HIV
12 and AIDS through the HOPWA program, which provides
13 emergency housing in the form of short-term rent, mortgage
14 and utility payments to prevent homelessness, tenant-based
15 rental assistance, which enables low income individuals to
16 pay rent and utilities until there is no longer a need or
17 until they are able to secure other housing. Supportive
18 services, which provide case management, basic telephone
19 assistance, and smoke detectors, and permanent housing
20 placement, which allows assistance for reasonable security
21 deposits, related application fees and credit checks.

22 HOME Investment Partnerships program. The HOME
23 Investment Partnerships program awards funding to various
24 entities for the purpose of providing safe, decent
25 affordable housing across the State of Texas. To provide

1 this kind of support to communities, HUD awards an annual
2 allocation of approximately \$24 million to TDHCA.

3 Under the HOME program, TDHCA contracts with
4 applicants for the administration of homebuyer assistance
5 program, including a contract-for-deed set-aside to assist
6 in the conversion of contract-for-deed arrangements into a
7 warranty deed. Also, there is the homeowner
8 rehabilitation program, the tenant-based rental
9 assistance, known as TBRA, and rental housing development
10 programs. In accordance with the HOME final rule, 15
11 percent of the total HOME allocation is set aside for
12 Community Housing Development Organization eligible
13 activities, also known as CHDOs.

14 And under HOPWA, the Texas Department of State
15 Health Services addresses the housing needs -- I already
16 read that. I believe I read that. My apologies.

17 So the comments received will help formulate the
18 draft plan presented at TDHCA's governing board meeting,
19 which is scheduled for September 4, 2014.

20 So we are going to start off with the housing
21 need topics and then move on to community development
22 needs topics.

23 And again, as you may have seen on the back
24 table, there are a list of topics available. So if anyone
25 has a comment on housing needs, please come forward. And

1 I believe, whether it is housing needs or community needs,
2 we have Kyle Ingram.

3 MR. INGRAM: That is me.

4 MS. YEVICH: Would you like to come up?

5 MR. INGRAM: I'm CDBG.

6 MS. YEVICH: Okay. You can come on up now.

7 MR. INGRAM: Just go ahead and go?

8 MS. YEVICH: Go ahead.

9 MR. INGRAM: All right. I am Kyle Ingram. I am
10 the local government services director of the Panhandle
11 Regional Planning Commission in Amarillo. Thank you guys
12 for the opportunity to come down and talk about the CDBG
13 program.

14 Primarily, I just want to say that it has been a
15 very important program to our region over the last 30
16 years. We have had about 300 projects that resulted in
17 about 20 water towers, hundreds of miles of line, water
18 and sewer infrastructure. So it is very key to our
19 communities.

20 We serve 63 cities and 26 counties. Only one of
21 those cities is over 20,000 in population. So we serve a
22 very rural area.

23 One of the key things to remember about the CDBG
24 program as you are putting together the rules for the next
25 five years, is that any barriers to entry on the

1 application side could be very detrimental to the small
2 rural communities out there. A community of 200 people
3 that has 80 water connections and an annual budget of
4 \$50,000 can't put up front money to do engineering and
5 environmental work in order to apply. So effectively,
6 they would be eliminated.

7 Annual application cycles are also damaging to
8 those small communities that may have one person that
9 fixes the water lines, works in the office, does all of
10 their paperwork. And so, anything that keeps those small
11 communities out -- they are impoverished, in our opinion,
12 and representing my board of directors and Executive
13 Director today -- would be detrimental to those rural
14 communities.

15 Also on the implementation side, it is key to
16 remember, and I know we all work as bureaucrats. Almost
17 everybody in this room does. And the paperwork, and
18 getting everything done right is very important. However,
19 we are benefitting people on the ground.

20 And those people that don't having running
21 water, in those communities, and they spend five years to
22 come up with \$15,000 match for a water line project. And
23 if something gets a hiccup, and contractors don't get
24 paid, it risks and jeopardizes those projects. So
25 anything that we can do, implementing anything that the

1 rules can do, to expedite the implementation allowing
2 easier modifications, more expeditious payments would be
3 very useful to the communities that are using the program.

4 And then finally, in regards to the disaster
5 relief program, on the water projects, the 180 day water
6 projects, I think there is a lot of logic to getting those
7 implemented in a year. For traditional disasters, such as
8 in our part of the world, wildfires, tornados, down here,
9 hurricanes, and everything else that happen, it might not
10 be exactly reasonable to try to get those done in a year.

11 Getting a debris pile moved, getting a shelter
12 built -- things that happen after disasters sometimes
13 don't necessarily happen within a year. So contractors
14 and engineering have to be done up front there.

15 I sincerely appreciate the opportunity to speak
16 with everybody here, and have some input on the Plan
17 development. We worked with the project for a long time
18 and it has benefitted our communities a lot. It has been
19 through a lot of different agencies. And we just want to
20 see it continue to be as useful. So thank you.

21 MS. YEVICH: Thank you very much, Kyle.

22 MR. INGRAM: And I have written. Can I submit
23 that now, or do I --

24 MS. YEVICH: You can do that, either now or
25 electronically. Perfect. Thank you so much, Kyle. Okay.

1 Our next speaker is Eric Christophe. Eric.

2 MR. CHRISTOPHE: Yes. Good to go?

3 MS. YEVICH: Yes.

4 MR. CHRISTOPHE: Basically, I am here today. We
5 participate --

6 MS. YEVICH: Would you like, introduce yourself
7 and say your name?

8 MR. CHRISTOPHE: My name is Eric Christophe, and
9 I am CEO of EFC Builders. We participate in the HOME
10 program here with TDHCA. We do quite a few of these homes
11 throughout the State of Texas.

12 And my concern about the program -- of course,
13 it is very beneficial. I think it is a wonderful program.

14 But one of the main issues -- of course, I think the
15 gentleman just mentioned it here, before -- we like the
16 public works stuff that they are doing in Amarillo -- is
17 payment for the contractors and whatnot.

18 From my understanding, as far as when we submit
19 invoices and stuff like that, there is a lot of money that
20 we have to come out of pocket with up front. The timing,
21 as far as -- is once we turn in our invoices, and stuff
22 like that, from my understanding, like I said, I think the
23 invoice, once it goes through the city and gets to the
24 state level, it sits on the desk for two weeks.

25 Our accounts being, you know, as small

1 contractors, of course, you know, we have other jobs that
2 aren't like state and government, you know, supported. We
3 basically don't have that ability to hold, as long as we
4 do -- our accounts usually are 30 days, 45 days at the
5 most.

6 So if there was any way that maybe the payment
7 process could speed up a little bit, or you know maybe,
8 instead of sitting on the desk for two weeks, you know,
9 within, say three to five days, somebody looks at it.
10 Because it has to go through so many people's hands.

11 And of course, don't get me wrong. We are
12 contractors. We do, you know, tons of work. I mean, not
13 just TDHCA's stuff too. But it gets down to where we are
14 holding the bag for the smaller guys, which are the guys
15 that usually get checks from week to week after they --
16 you know, have a seven day process of they finish the
17 work, and it is on the ground.

18 Some of those guys, it hurts. They can't hold
19 as long as, of course, we can hold sometimes. So if there
20 is anything that could be done about that, I think that it
21 would help the program, and we could you know, make
22 things, you know, kind of move a little bit more swiftly.

23 MS. YEVICH: Thank you very much, Eric. The
24 next speaker we have is Donna Johnson.

25 MS. JOHNSON: Good afternoon. My name is Donna

1 Johnson. And I am with Grantworks. We have submitted
2 some written comments. And also, we brought with us some
3 comments from some of the cities we work with.

4 The first thing that I want to tell you is that
5 we are really enjoying working with TDHCA the last couple
6 of years. There has been a great change there. And we
7 want to really applaud that staff.

8 That being said, the current system that we have
9 right now of funding is not sustainable. It just isn't.
10 It is just not going to work.

11 We would encourage TDHCA to award contracts
12 instead of reservations. To award a contract, but not
13 fund those contracts for twelve months. So the City would
14 get a contract, but the funding for it wouldn't actually
15 be put in the cubbyhole for them for twelve months.

16 That would kind of help with this expending of
17 the funds for the Agency. Then those cities have that
18 twelve months up front to go ahead and find their home
19 owners, who they are going to be assisting. This is for
20 the HOME HRA program; I am sorry. Who they are going to
21 be assisting.

22 That twelve months comes. We know the money is
23 going to be available. Then give those CAs three months
24 to actually set people up. If you don't have them set up
25 by that 15 month mark, we are putting the money back over

1 here.

2 And allow people -- perhaps there was another CA
3 that was able to set up five home owners and they have got
4 another two. Well, this CA couldn't set up any. So take
5 that money, move it around over here.

6 Let them be able to dip into that, and that
7 reservation system, to fund more people. And then you
8 could have your kind of open reservation for other people.
9 That is one suggestion that we have.

10 Secondly, in addition to doing it that way, and
11 going back to contracts, in our written comments to you,
12 we do spell that out a little more in detail. But we also
13 understand -- well, first, let me just start by saying, we
14 really strongly feel that the housing rehab assistance
15 activity should be funded at a rate that is commensurate
16 with the demand.

17 And I think it is pretty evident to those of us
18 that work with HRA the demand is great, and the funding is
19 very small. So we do know that from sitting in on a
20 single family roundtable, last April, that there is kind
21 of the idea of using TCAP repayments could be moved and
22 used.

23 The TCAP repayments could be used to fund the
24 multi family projects. And then take those HOME funds
25 that are in multi family and move those over into single

1 family. It is kind of replacing that.

2 And we really, you know, that had been brought
3 up by someone at the Agency. I don't know who it was. It
4 was at some roundtable. But we all really thought that
5 was a good idea. And we want to encourage you to do that.

6 And with that, again, talking about how we need
7 to fund this, at a rate that is commensurate, you know,
8 increasing funds for the HRA program is actually in line
9 with a recently published HUD document, a report talking
10 about measuring the costs and the savings of aging in
11 place. And for those of us who have actually worked with
12 HRA -- and I have been doing it for the last ten years --
13 the majority of the home owners that we are assisting are
14 elderly people.

15 Being able to have an elderly person age in
16 place in the end costs everyone a whole lot less money.
17 And it is very important for people to have a safe place
18 to live.

19 I live in rural Texas. I don't live here in
20 Austin. You know, I don't have city garbage at my house.

21 I have a water well.

22 You know, I have to deal with my trash in a very
23 personal way, because nobody is going to come get it. And
24 so it is a reality that I live every single day, and I see
25 my neighbors live it.

1 So providing safe, decent, affordable housing to
2 low income rural Texans is very passionate to me. And so
3 the more money that we can put in that, and the easier
4 ways that we can come up with for people to stay in their
5 homes. You know, we need to start figuring out how to
6 think outside the box, and make that happen. Thank you
7 very much.

8 MS. YEVICH: Thank you, Donna. The next speaker
9 I have is Gandolf Burros. Thank you.

10 MR. BURROS: Good morning. My name is Gandolf
11 Burros. I am President and owner of Grant Development
12 Services, a consulting firm that focuses on small rural
13 communities. We have over 28 years of experience working
14 with the state agencies that have administered CDBG. And
15 we regard ourselves as strong supporters of the CDBG
16 program.

17 In response to this Notice for Public Hearing,
18 which stated that stakeholder views are requested on
19 community development needs, we respectfully submit the
20 following comments. And we have also delivered you a
21 written text, including other details.

22 The broad community development needs, including
23 access to basic services, such as water, sewer and housing
24 are very easy to define. Where the CDBG program is
25 deficient is in the development of scoring criteria that

1 fairly and meaningfully evaluate both the level of need
2 and the proposed impact for each CDB project, as scoring
3 criteria.

4 We are concerned that TDA is moving toward a
5 revised scoring criteria that is a step backwards. The
6 program would be rendered ineffective if this revised
7 criteria were to have few or no scoring items that
8 evaluate needs being presented, and few or no scoring
9 items that evaluate the impact the project would have if
10 funded.

11 If TDA implements the revised rules that rely
12 simply on inaccurate census data to score projects on
13 criteria such as community distress and poverty, this
14 would have little or no value in actually identifying
15 either need or impact of specific projects. In the event
16 that TDA moves toward the American Community Survey for
17 its census data, this will produce an inaccurate
18 accounting of poverty and community distress.

19 In the past, TDA has appealed to HUD regarding
20 inaccuracies in the census data, and has even secured
21 approval from HUD for a process to separate actual survey
22 data for census data in order to document beneficiaries.
23 So TDA has recognized that, particularly in small cities,
24 ACS census data is really not an accurate reflection. The
25 reason is, the ACS does not rely on actual contact surveys

1 as did the older forms of census.

2 ACS interviews a small sample and then, from
3 that small sample, projects data for the entire census
4 area. For small rural communities, the reliance on
5 statistical sampling is extremely problematic. Making
6 statistical projections based on a small number of samples
7 in a small community can result in wildly inaccurate
8 projections.

9 For example, a small city has its ACS numbers
10 generated from an interview pool of less than 10 percent
11 of the region. It is easy to see how the distress factors
12 can be inaccurately reported, and mayors in small
13 communities can easily vouch for how poorly ACS represents
14 their cities.

15 The CDB scoring criteria should never be focused
16 only on making CDBG applications easier for the staff to
17 score, at the expense of measuring need and impact. Need
18 and impact are the required values which enable TDA to
19 better serve the mission of the CDB program. TDA scoring
20 should not rely on a few demographic items such as poverty
21 rate and community distress solely because those numbers
22 can easily be secured.

23 We understand that census based criteria are
24 easier to score. But is ease of scoring really worth
25 abandoning all of the other traditional COG and RRC

1 scoring needs that enable these COG and RRC to sort out
2 who most needs a project, and who will most benefit from
3 it?

4 I would like to echo what the gentleman said
5 previously regarding the extreme disadvantage that the
6 proposed state scoring criteria would have on small
7 communities, requiring them to pay for a procurement, full
8 procurement before they submit. Requiring them to have an
9 engineer do plans and specs. Requiring a preliminary
10 environmental. Requiring a preliminary engineering
11 report. Little cities cannot afford to do that.

12 Particularly, they can't afford to do it year
13 after year. And if this criteria goes into effect, we
14 anticipate that hundreds of small communities that
15 participate now will simply disappear, because they know
16 they can't win. And they know what it costs them to even
17 compete, and it is too much. And that will significantly
18 damage the program.

19 And again, we feel that over time that kind of
20 criteria will drive out the small city, and the state's
21 lack of scoring, or lack of recognition of points for the
22 basic provision of human services, of first time water and
23 first time service are now almost impossible to fund
24 because the state puts so much reliance on the cost per
25 beneficiary. It costs way more to hook up 25 new first

1 time water services, that it does to increase water
2 pressure by five pounds over a target area.

3 The lower number of beneficiaries means, you are
4 funding less and less projects that actually provide
5 access to a first time basic survey. So our summary is
6 that the scoring criteria to be implemented by the
7 Department of Agriculture should always address need and
8 impact.

9 We recommend that TDA should never rely
10 primarily on census based criteria. TDA should emphasize
11 specifically need and impact, even though they are more
12 difficult to score, they are at the heart of what your
13 program is about, and should be emphasized. And census
14 should be used as a tie breaker, not as a scoring
15 criteria. Thank you.

16 MS. YEVICH: Thank you, Mr. Burros. The final
17 speaker we have at this point is, I believe it is Katerina
18 Dittimore? You are welcome.

19 MS. DITTEMORE: Good afternoon. My name is
20 Katerina Dittimore with Grant Development Services. I
21 have a couple of letters to read into the record.

22 One is on behalf of the City of Cottonwood
23 Shores. This is a letter that was submitted to
24 Commissioner Staples for the record. The Texas
25 development Community Block Grant program, now a part of

1 TDA, has long been a reliable resource for small
2 communities in Texas that often struggle to provide basic
3 services for our residents.

4 It has come to our attention that the Texas CDBG
5 program staff has proposed significant changes to the 2015
6 Texas CDBG Action Plan that will have negative impacts
7 upon our participation in the program. Number one, the
8 biennial funding cycle has been successful for many years,
9 and should not be changed.

10 A single year funding cycle will place greater
11 administrative and financial burdens on us without
12 improving our chances of funding. A single year
13 application cycle will double the number of expensive
14 notices, public hearings and meetings, engineering
15 estimates, mapping, income surveys and application writing
16 work for hundreds of Texas communities, including us.

17 The letter goes on, number two, the proposal to
18 award points to Applicants that have completed preliminary
19 engineering and or environmental review is not affordable
20 for our community. We would have to procure an engineer,
21 and or grant administrator to prepare these items, and
22 estimate these costs to be upwards of \$25,000.

23 If we are not funded, those out of pocket
24 expenses would be wasted, since we cannot afford to
25 implement our projects without the grant award. This also

1 reinforces the need to maintain the biennial funding
2 cycle.

3 Number three, TDA has proposed that points be
4 awarded to projects including a comprehensive plan.
5 Planning studies of any kind and regular updates to them
6 are expensive, and not often funded by grants. We believe
7 that the community needs assessment in our application
8 adequately describes the priorities of our community.

9 We can demonstrate this by including the
10 community needs, and the resolution that authorizes our TX
11 CDBG application, thereby taking official action
12 demonstrating, we have considered our project priorities
13 and informed the public. I appreciate your serious
14 consideration of these comments prior to the release of
15 the draft action plan.

16 We rely on the Texas CDBG program to improve our
17 community, and are deeply concerned that making these
18 changes will undermine TDA's goal to develop viable
19 communities, principally for persons of low to moderate
20 income. And I will repeat, it will undermine TDA's goal
21 to develop viable communities. Signed by the City
22 Administrator, Sheila Moore.

23 The second letter that I have is from
24 Commissioner Staples, dated July 3, 2014. Dear
25 Stakeholders, as you know, the Department of Agriculture

1 recently proposed changes to the Community Development
2 Block Grant program. Following the two teleconferences
3 TDA convened to discuss these proposed changes, we
4 received a number of questions and comments regarding the
5 proposal.

6 After speaking with a variety of stakeholders,
7 it is clear we do not have enough time to have the level
8 of discussion I believe we need for certain items while
9 the regional review committee hearings are being
10 conducted. Therefore, I have asked my staff to postpone
11 consideration of the proposed changes as they relate to
12 the application cycle and the scoring criteria.

13 We will be scheduling additional conference
14 calls and other outreach efforts to further discuss these
15 issues with you for future application cycles. This
16 means, we will take applications for the 2015-2016
17 application cycle, using the same process to establish
18 scoring criteria as was utilized in 2013-2014.

19 As a result of these changes, we are updating
20 our proposed 2015 action plan, and proposed rule changes
21 now. And we will have those available for public comment
22 and discussion very soon.

23 Additionally, I have asked TDA staff to provide
24 you with a revised summary of the program changes with
25 which we will move forward for consideration, and an

1 updated time line for the 2015 program year. We will
2 actively engage you in this process.

3 Thank you for your input into this important
4 process. Our team here at TDA is committed to ensuring
5 that any program modifications are fully and thoughtfully
6 discussed and result in positive changes for our
7 stakeholders and the Texas community. Sincerely, Todd
8 Staples.

9 So additional comments, I thank TDA staff and
10 the Department of Agriculture for working with us, and
11 cooperating with us in these concerns. I will be
12 attending a Heart of Texas regional review committee
13 meeting on Friday.

14 And I have looked at the handouts for that
15 meeting. And it still has the old scoring criteria. I am
16 sorry, the scoring criteria that was proposed in the
17 Exhibit A in the handout materials. So I am concerned
18 about that. It doesn't seem to reflect what is in this
19 letter from Commissioner Staples. Those are my comments.

20 MS. YEVICH: Thank you. One point of
21 clarification. The first letter you read into record is
22 from City of Cottonwood Shores. You didn't state a date,
23 nor do I see it on this.

24 MS. DITTEMORE: On the written record?

25 MS. YEVICH: On the written record, there was no

1 date on the letter. So I just wanted to point that out.

2 MS. DITTEMORE: Okay. Thank you.

3 MS. YEVICH: Thank you. And is there anyone
4 else here? Please, come on up.

5 MS. LANGFORD: Yes. I was filling one out.

6 MS. YEVICH: Not a problem. Thank you kindly.

7 Judy Langford.

8 MS. LANGFORD: Yes, ma'am. Judy Langford with
9 Langford Community Management Services. Eric Christophe
10 and his father Herman work a lot on the HOME program,
11 houses that we administer for cities. And Eric was really
12 good about talking about that they struggle because of the
13 time frames in getting monies out.

14 And I know that it is his first time to get up
15 and talk in this public. And I appreciate him doing so,
16 in this public forum, that we get kind of used to doing
17 over time.

18 But they also are being highly affected by the
19 fact that right now, the way the funds are being given
20 out, if you will, through the submission, through the
21 computer system, is that we were up until now bidding out
22 projects for the HRA to have them in setups. We have now
23 stopped because you can't get them -- you don't know how
24 many you are going to get funded.

25 So the contractor who has bid potentially on

1 five houses now may only have one house in a city. And he
2 bid it on getting five houses. But because you go to the
3 lotto system to get your houses funded, and you get one
4 out of five, even though you are trying to get five
5 submitted at one time, because you have them in the setups
6 is just not working.

7 And we have stopped bidding out our projects
8 until we have a better idea of what funding is. So I am
9 kind of going to say ditto to Donna Johnson, so you don't
10 have to listen to it all again.

11 Because what she said is, I think, a very doable
12 way of getting the funds out, that are fair and equitable.

13 And that way, we actually can keep our contractors that
14 work on these projects, being able to be funded, and being
15 able to keep them building the houses for the funds that
16 are available.

17 Mr. Ingram from Panhandle, I appreciate your
18 comments. And I ditto those as well, as far as what he
19 said. I don't think there is any reason to have to re-say
20 them, other than, the use of the 2014 action plan for TDA,
21 I would really like to see us continue with that, until we
22 have had lots of discussions about the process and the
23 scoring criteria for CDBG.

24 So I talked about the change in the setups, the
25 set-asides. Multi family funds, not only could you

1 potentially use TCAP for that, multi family has a number
2 of sources of funds for the program of multi family. HRA
3 has HRA. And we would like to see, even if you don't use
4 TCAP for it, is that the funds go to HRA, as opposed to
5 multi family. There is just other sources for them.

6 And then lastly, I was talking to another agency
7 person that was not TDHCA or TDA. And they asked me if I
8 had heard about the super OMB. And my question for staff
9 is, have you all heard about the super OMB. And are you
10 starting to implement it?

11 And will it affect the five year combined action
12 plan. Because my understanding is what it says is that
13 particularly for small businesses, that the potential for
14 being paid on the front end of a project is that it is
15 going to require that.

16 And that will totally reset the way consulting
17 is going to be handled, if that is the case. And it is
18 specifically for small businesses. And it was driven for
19 small businesses by small businesses. So have you all
20 heard about it? I haven't yet.

21 MS. YEVICH: Well, to remind, we are not here to
22 speak on that.

23 MS. LANGFORD: I know.

24 MS. YEVICH: But we will certainly take that
25 into advice and consideration.

1 MS. LANGFORD: Well, is it going to be -- I
2 guess the question is, is it going to be used to come up
3 with the five year action plan or not. And if that is so,
4 it is hard for small businesses.

5 And right now, the way -- and it is not -- as
6 far as the five year combined plan is concerned, it is
7 probably not going to be something that you put in the
8 five year plan. But I would like to speak to it, anyway.

9
10 Right now, the way TDA is funding grant
11 consulting, and having the 35 percent and the 50 percent,
12 the 35 percent cash flow for us is really difficult. And
13 I would really like to see it go back to, at the very
14 least, at the 50 percent. And I know that is not spelling
15 it out completely. But we can't request funds until we
16 are at construction.

17 And that is -- cash flow for us, that is very
18 difficult for a small business, if we are held to 35
19 percent of the funds, when we are not the controlling
20 factor for when we go to construction. The engineers,
21 they are the ones that prepare the plans and specs. We
22 can push, but it is ultimately the engineers. And they
23 are held at 50 percent, so I would like to see it go back
24 to 50 percent.

25 And if the OMB goes in place, and allows us to

1 be paid on the front end, well then that probably won't be
2 a necessary rule. But anyway, I would like you to
3 consider for going back to 50 percent. Thank you.

4 MS. YEVICH: Thank you so much. Do we have
5 anyone else here to speak?

6 (No response.)

7 MS. YEVICH: Well, hearing or seeing none, with
8 that, the meeting is concluded. Thank you.

9 (Whereupon, at 2:45 p.m., the hearing was
10 concluded.)

C E R T I F I C A T E

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IN RE: 2015-2019 State of Texas Consolidated
 Plan public hearing

LOCATION: Austin, Texas

DATE: July 23, 2014

I do hereby certify that the foregoing pages,
 numbers 1 through 29, inclusive, are the true, accurate,
 and complete transcript prepared from the verbal recording
 made by electronic recording by Penny Bynum before the
 Texas Department of Housing and Community Affairs.

	<u>07/26/2014</u> (Date)
(Transcriber)	
On the Record Reporting 3636 Executive Ctr Dr., G-22 Austin, Texas 78731	

**Texas Homeless Network's Comments on the State of Texas 2015-2019 Consolidated Plan
September 30, 2014**

We are Eric Samuels and Mary Dodson, and we work for the Texas Homeless Network (THN). We appreciate the opportunity to comment on the 2015-2019 State of Texas Consolidated Plan.

Comments:

1. Housing ends homelessness. We support the Plan's goals (p. 285-290) of:
 - a. Using ESG for homelessness prevention, shelter, and rapid re-housing
 - b. Using HOME TBRA for rapid re-housing
 - c. Constructing and rehabilitating units of multifamily affordable housing
 - d. Using HOPWA TBRA for rapid re-housing and homelessness prevention
 - e. Using HOPWA STRMU for homelessness prevention
 - f. Using HOPWA Permanent Housing Placement Assistance for homelessness prevention
 - g. Using \$30 million in CDBG funds to create more housing in *colonias*

Draft

We ask that you also:

- Prioritize persons who are in homeless situations for TBRA funds from HOME and HOPWA
 - Prioritize families experiencing homelessness as tenants in multifamily units
2. We appreciate consulting with TDHCA on CoC goals, the allocation of ESG funds, the development of coordinated assessment systems, the establishment of standards for services, and the evaluation of ESG-funded projects.
 3. For HOME, CDBG, and HOPWA, prioritize projects that use evidence-based practices and promising practices in housing. Like ESG focuses on outreach, emergency shelter, rapid re-housing, and homelessness prevention, other programs can prioritize Permanent Supportive Housing (PSH) using a Housing-First approach. This housing intervention and framework assist vulnerable individuals and families to live in the community by meeting their basic need for housing and offering ongoing support services. [see descriptions of PSH and HF on page 2] Specifically, from USICH:
Housing First permanent supportive housing programs can also be implemented by creating set-asides within affordable housing developments that receive investments of public funding or leverage private investments using Low Income Housing Tax Credits. This approach is used to create a set-aside of supportive housing units (1) within affordable rental properties that primarily assist other households without disabilities. Often set-asides are created through strong incentives and partnerships that involve state or local government agencies that finance housing development, operating subsidies (to make rent in the supportive housing units affordable to people experiencing homelessness) and the alignment of funding for supportive services to help tenants maintain housing stability, as well as systematic outreach and referral processes to ensure priority populations get housed.
 4. Allow CDBG funds to be used for public services and targeted towards programs that work to end homelessness, including meeting match requirements and funding supportive services.

Permanent Supportive Housing, as described by the U.S. Interagency Council on Homelessness (USICH):

- a. PSH is decent, safe, affordable, community-based housing
- b. PSH provides tenants with rights to tenancy
- c. PSH offers voluntary and flexible services and supports to help people stay housed
- d. PSH stabilizes people's housing and "addresses underlying conditions that often have gone untreated for many years"
- e. "Permanent" means the length of residency does not have a time limit; tenants may live in their homes as long as they meet the obligations of tenancy
- f. Participation in services is not required as a condition of living in the housing.
- g. Core elements
 1. Housing: Tenant choice, Access, Quality, Integration, Rights of tenancy, Affordability, Coordination between housing and services, and Delineated roles – functional separation between housing staff and services staff
 2. Services: Tenant choice, Housing focus, Assertive outreach and engagement, Case management, Recovery supports (mainstream, specialized, natural), incl. peer support
- h. Research has shown that PSH "leads to improved residential stability and reduction in psychiatric symptoms," and "is associated with significant reductions in costs for emergency room visits, hospitalizations, shelters, sobering center, jails, and other public services used by people experiencing homelessness."

Housing First, as described by the U.S. Interagency Council on Homelessness (USICH):

- a. Housing First is an approach that "offers permanent, affordable housing as quickly as possible, and then provides the supportive services and connections to the community-based supports..."
- b. "Housing provides a foundation from which people can pursue other goals."
- c. People do not need to demonstrate "housing readiness."
 1. "Income, sobriety and/or participation in treatment or other services is not required as a condition for getting housing."
 2. "All services are voluntary and are not a condition for retaining housing."
 3. Anyone who is in a homeless situation is *ready* for housing.
- d. Housing is permanent; tenant residency has no time limit.
- e. "Tenants have a lease and hold rights and responsibilities of tenants."
- f. "Housing First programs work to 'screen in' people with significant challenges who might be screened out of housing because of poor credit or prior evictions."
- g. Tenants "are held accountable and there are consequences for behaviors that violate the terms of their lease agreements, but housing and service providers—and tenants—work together in an effort to avoid evictions."
- h. Research has shown:
 1. "More consumer choice regarding housing, treatment, and daily living"
 2. Less time spent in a homeless situation, and fewer returns to homelessness
 3. High rates of housing retention and stability for people with histories of homelessness and instability
 4. Tenants had fewer hospital emergency department visits, inpatient hospitalizations, and stays in sobering facilities and shelters.
 5. "Savings in public costs for ER and hospital inpatient care, sobering centers, shelters, ambulance services, jails, and other services.

Housing First

Housing First, as described by the U.S. Interagency Council on Homelessness (USICH) at http://usich.gov/usich_resources/solutions/explore/housing_first:

Housing First is an approach that offers permanent, affordable housing as quickly as possible for individuals and families experiencing homelessness, and then provides the supportive services and connections to the community-based supports people need to keep their housing and avoid returning to homelessness. Housing provides a foundation from which a person or family can access the services and supports they need to achieve stability, begin the recovery process, and pursue personal goals. While Housing First can be used in both short- and long-term interventions, the approach is closely tied to permanent supportive housing and therefore discussed in this context here. The Housing First approach can be applied to rapid re-housing as well.

Problem or Challenge:

Traditionally, many housing providers have required people experiencing homelessness to demonstrate "housing readiness" either by achieving sobriety or entering treatment before offering permanent housing. The housing readiness approach can lead to people with relatively fewer needs accessing service-intensive housing, while people with more complex problems remain in shelters or on the streets. Housing First permanent supportive housing was created when a new approach was sought to help people with long histories of homelessness secure housing.

Solution:

Housing First is an approach that offers permanent housing as quickly as possible for people experiencing homelessness, especially for people with long histories of homelessness and co-occurring health challenges, while providing the supportive services people need to keep their housing and avoid returning to homelessness.

*The approach begins with an **immediate focus on helping individuals and families get housing**. Income, sobriety and/or participation in treatment or other services are not required as a condition for getting housing. All services are voluntary and are not a condition for retaining housing. Housing provides people with a foundation from which they can pursue other goals. Tenants are assisted in developing or improving skills for independent living while they live in permanent housing instead of requiring them to complete a transitional residential program first.*

*Housing is permanent, that is, it is not time limited. Housing may be provided in single-site permanent supportive housing, as set asides within apartment communities, or in scattered sites, often using some form of rent subsidies that makes the unit affordable. An apartment is usually not shared with other households. Tenants hold a **lease** for their housing, and have the normal rights and responsibilities of tenants. In some cases, a Housing First program may use a "master lease," which allows the program to hold the lease and establish a sub-lease or rental agreement with the tenant. This sort of arrangement can be used when landlords might be*

reluctant to rent directly to a tenant because of past evictions or poor credit and the lease can often be transferred to the tenant after a period of successful occupancy.

Housing First permanent supportive housing programs often work to **minimize barriers to housing access** by simplifying the application process for housing or subsidies. Housing First programs work to “screen in” people with significant challenges who might be screened out of housing because of poor credit or prior evictions. If the program uses tenant-based rent subsidies, assistance is provided to help people locate a rental unit and negotiate lease agreements with landlords.

Supportive services are delivered from initial engagement through the housing search and continue after housing placement. Services focus on promoting housing stability and achieving other personal goals related to well-being and recovery. The intensity and duration of supportive services varies, depending on the population served by the program. Services in Housing First programs are often provided by multidisciplinary teams using Assertive Community Treatment or similar models, and team members make frequent visits to see clients in their homes or other community settings, instead of waiting for clients to come to an office appointment.

For people who have experienced chronic homelessness, and other people with serious mental illness or other complex and disabling challenges, services will be more intensive and designed to provide ongoing, long-term support including treatment for mental health or substance use disorders, and other health care and case management services.

Participation in services is actively encouraged but not required as a condition of tenancy. Services are flexible and individualized, and service providers do “whatever it takes” to help the person or family achieve goals related to housing stability. Service providers may offer help with practical needs (including food, clothing, household supplies) and work to establish a trusting relationship before expecting that a person will engage in treatment or more intensive case management services. Peer-based recovery services are often offered and may emphasize consumer empowerment and self-direction.

Implementation Steps/Tips:

Partnerships with landlords and housing providers: Good relationships with local landlords are often an essential component of a successful scattered site Housing First program. Housing First permanent supportive housing programs should reach out to landlord organizations and property management companies, as well as civic groups, churches, and other faith-based organizations to mitigate their concerns. Programs should maintain regular communication with landlords to ensure that participants are paying rent and being responsible tenants, and to trouble-shoot problems or resolve conflicts before they escalate. Sometimes programs offer an additional rental security deposit, or the program may place some funds into a reserve account that is available if needed to pay for damages or lost rent. Often programs will help participants move out and relocate rather than get evicted if problems cannot be resolved. When programs are successful, landlords and property managers are often willing to rent to other individuals or families served by the same program.

In single-site permanent supportive housing that uses a Housing First model, housing management and supportive services roles are usually clearly separate and performed by

different staff or partner organizations who share a mission and goals related to housing people who have experienced homelessness. Effective policies and procedures are in place to facilitate ongoing communication and problem-solving. Supportive services staff usually work on-site at the building during the day and some evenings and/or weekend hours. The housing site may also provide staffing for security or "front desk" services, which may include a focus on limiting uninvited visitors and enforcing rules around tenancy that are designed to protect the safety, peacefulness, and quality of the housing for tenants and neighbors.

Housing First permanent supportive housing programs can also be implemented by creating set-asides within affordable housing developments that receive investments of public funding or leverage private investments using Low Income Housing Tax Credits. This approach is used to create a set-aside of supportive housing units (1) within affordable rental properties that primarily assist other households without disabilities. Often set-asides are created through strong incentives and partnerships that involve state or local government agencies that finance housing development, operating subsidies (to make rent in the supportive housing units affordable to people experiencing homelessness) and the alignment of funding for supportive services to help tenants maintain housing stability, as well as systematic outreach and referral processes to ensure priority populations get housed.

When problem behaviors arise in Housing First supportive housing, responses are individualized and graduated, meaning that people are held accountable and there are consequences for behaviors that violate the terms of their lease agreements, but housing and service providers work together in an effort to avoid evictions. Service providers increase efforts to engage tenants in supportive services in order to mitigate problems or motivate change, and they often use service strategies such as Motivational Interviewing. Medical respite facilities or residential treatment programs may be available and used during acute crises or to meet short-term needs for more intensive support while the Housing First permanent supportive housing program preserves tenants' right to return to their home or to relocate to another housing unit if needed. Evictions or other sanctions may be imposed in cases of violence or property damage, continued non-payment of rent, drug dealing or other criminal activity. Peer groups can also be a way for tenants in single-site housing to build their social networks, cultivate a sense of community, and be responsible and considerate tenants.

For more tips about implementing Housing First programs, see these "Tips for Success" available from SAMHSA's Homelessness Resource Center and a toolkit prepared by the National Alliance to End Homelessness.

Outcomes/Results:

The Pathways Housing First model, which was first implemented in New York City and later replicated in several cities around the country, has been rigorously evaluated. Pathways to Housing's Housing First Program is listed in SAMHSA's National Registry of Evidence-Based Practices and Programs (NREPP) and a summary of the research evidence is available on-line. In Seattle, the Downtown Emergency Service Center (DESC) operates a site-based permanent supportive housing program, 1811 Eastlake, using a Housing First approach for men and women with chronic alcohol addiction who are some of the highest utilizers of publicly-funded crisis

services. Findings from an evaluation published in the *Journal of the American Medical Association* in 2009 (2) included taxpayer savings of more than \$4 million over the first year of operation, reflecting significant reductions in hospital emergency room visits, inpatient hospitalizations, and stays in sobering facilities and shelters.

Results demonstrated by the Pathways Housing First, 1811 Eastlake, and other Housing First programs include high rates of housing retention and stability in housing, which have been demonstrated by programs serving people who had long histories of homelessness and instability. Other outcomes include less time homeless (living on the streets or in shelters) and more consumer choice regarding housing, treatment, and daily living. Housing First programs for adults experiencing chronic homelessness, including both the Pathways scattered-site model and single-site permanent supportive housing, have demonstrated substantial savings in public costs for hospital care (emergency room and inpatient hospitalizations), sobering centers, shelters, ambulance services, jails, and other services.

Resources:

In 2007 HUD released a report *"The Applicability of Housing First Models to Homeless Persons with Serious Mental Illness."*

Information about the Pathways Housing First model, including a video and links to more information is available on their website.

The Corporation for Supportive Housing (CSH) and the National Center on Addiction and Substance Abuse at Columbia University (CASA) collaborated to evaluate the implementation of supportive housing for people with substance use problems who were experiencing chronic homelessness in New York City. The purpose of CASAHOPE (Housing Opportunities Program Evaluation) was to study the impact and implementation of programs that used, to varying degrees approaches consistent with Housing First. The CASAHOPE reports provide useful information about components of the model and some of the lessons learned about program implementation.

National Alliance to End Homelessness provides several resources describing Housing First, including:

- A summary entitled, "What is Housing First?"
- Frequently Asked Questions about Housing First for Individuals and Families

Permanent Supportive Housing (PSH)

PSH, as described by the U.S. Interagency Council on Homelessness (USICH) at http://usich.gov/usich_resources/solutions/explore/permanent_supportive_housing:

Permanent supportive housing is decent, safe, affordable, community-based housing that provides tenants with the rights of tenancy and links to voluntary and flexible supports and services for people with disabilities who are experiencing homelessness. Permanent supportive housing is a proven, effective means of reintegrating chronically homeless and other highly vulnerable homeless families and individuals with psychiatric disabilities or chronic health challenges into the community by addressing their basic needs for housing and providing ongoing support.

Problem or Challenge:

Permanent Supportive Housing (PSH or “supportive housing”) is for people who need long-term housing assistance with supportive services in order to stay housed. Individuals and families living in supportive housing often have long histories of homelessness and face persistent obstacles to maintaining housing, such as a serious mental illness, a substance use disorder, or a chronic medical problem. Many supportive housing tenants face more than one of these serious conditions.

Solution:

Supportive housing links decent, safe, affordable, community-based housing with flexible, voluntary support services designed to help the individual or family stay housed and live a more productive life in the community. It looks and functions much like any other brand of housing. People living in supportive housing have a private and secure place to make their home, just like other members of the community, with the same rights and responsibilities. The difference is that they can access, at their option, services designed to address their individual needs and preferences. These services may include the help of a case manager or counselor, help in building independent living and tenancy skills, assistance with integrating into the community, and connections to community-based health care, treatment, and employment services. Permanent supportive housing programs allow people with one or more serious disabling conditions to stabilize their housing and address underlying conditions that often have gone untreated for many years. The combination of housing and supportive services creates a synergy that allows tenants to take steps toward recovery and independence.

The “permanent” in “permanent supportive housing” means the length of stay is up to the individual or family. There is no time limitation, and tenants may live in their homes as long as they meet the basic obligations of tenancy. While participation in services is encouraged, it is not a condition of living in the housing. Housing affordability is ensured either through a rent subsidy or by setting rents at affordable levels.

There is no single model for supportive housing’s design. The provision of supportive housing may involve the renovation or construction of new housing, set-asides of apartments within privately-owned buildings, or leasing of individual apartments dispersed throughout an area. There are three primary forms of supportive housing:

- **Single-site housing**, in which the tenants receiving support services live in units in the same building or a group of buildings, with the support services provided either on site or off site.
- **Scattered-site housing**, in which tenants live in independent apart-ments throughout the community, in either private or agency-owned housing; depending on the program, staff can deliver some support services through home visits, or all services may be provided at other locations in the community.
- **Mixed housing**, in which tenants live in developments that contain a mixture of supportive housing tenants and other tenants not part of the supportive housing program.

Implementation Steps and Tips:

Supportive housing emerged as an intervention to prevent and end homelessness in the 1980s. Since that time, use of the model has expanded nationwide. As its use has grown, national organizations and the Substance Abuse and Mental Health Services Administration (SAMHSA) have drawn from practice and research to identify several core elements of permanent supportive housing:

Housing

1. **Tenant choice.** Supportive housing staff helps tenants or potential tenants define their housing needs and preferences. Tenants choose whether or not to participate in services and cannot be evicted from their housing for rejecting them. In scattered-site supportive housing, tenants choose where they want to live, and receive help finding an apartment that best meets their needs.
2. **Access.** The housing is available to people who are experiencing homelessness or are precariously housed and who have multiple barriers to housing stability and employment. These barriers may include little or no income, poor or no credit histories, prior evictions, disabilities, histories of criminal justice involvement, and past or current substance abuse. In scattered-site housing, staff may facilitate access by proactively developing positive relationships with landlords, advocating on behalf of prospective tenants, and offering landlord incentives such as reimbursement for excessive damages or court costs should the tenancy be unsuccessful.
3. **Quality.** The housing is similar to what is available to other households at fair-market rents in the community. It has a home-like, residential appearance (on both the interior and exterior), and its scale, appearance, design, and quality are consistent with (or exceed) neighborhood and community standards. The housing units provide adequate living space for essential daily activities such as cooking, eating, sleeping, and studying. Ideally each unit has a private bathroom and kitchen. The housing includes appropriate safety features and meets standards for quality established by applicable codes and regulations.
4. **Integration.** Adults with disabilities have a right to receive housing and supportive services in the most integrated settings that are available. There are several ways that integration can be achieved, including scattered-site or mixed-housing models in which supportive housing tenants live in buildings that include neighbors who do not have disabilities, as well as site-based supportive housing that is located in neighborhoods that provide access to an array of community services and resources used by people with and without disabilities. Integration reduces stigma and offers tenants opportunities to interact with a broad spectrum of neighbors, as in other housing.

5. **Rights of tenancy.** Supportive housing tenants have a lease in their name and control over their living space, meaning that each tenant has a key to his or her own apartment or room and the tenant can come and go at any time and control who can visit. In some cases, a service agency may hold a lease with tenants holding a sublease, and in other cases the agency itself might own the property. Regardless of the arrangement, tenant leases or subleases confer full rights of tenancy, including limitations on landlords' entry into the property and the right to challenge eviction in landlord-tenant court. Tenants can remain in their homes as long as the basic requirements of tenancy are met—paying the rent, not interfering with other tenants' use of their homes, not causing property damage, etc. House rules, if any, are similar to those found in other housing.
6. **Affordability.** Supportive housing tenants ideally pay no more than 30 percent of their income toward rent and basic utilities and rarely pay more than 50 percent. The remainder of the rent is covered either by tenant-based rental assistance, which tenants can use in housing of their choice, or project-based rental assistance or an operating subsidy, which is linked to a specific location.
7. **Coordination between housing and services.** Property managers and support service staff stay in regular communication and coordinate their efforts to help prevent evictions and to ensure tenants facing eviction have access to necessary services and supports.
8. **Delineated roles.** The supportive housing model distinguishes between housing and services. Even if some services are provided on site, there is a functional separation, with the housing elements (rent collection, property maintenance, enforcement of responsibilities of tenancy) carried out by different staff than those providing services (case management, mental health treatment, wraparound services).

Services

1. **Tenant choice.** Supportive housing tenants have choices in the support services that they receive. Rather than a limited menu of services for a particular location, supportive housing is intended to help tenants define their needs and preferences, and then to develop an individual plan of support that reflects those. As their needs change over time, tenants can receive more intensive or less intensive support services without losing their homes; the services come and go rather than the tenants.
2. **Housing focus.** To help tenants achieve residential stability, the service team focuses on increasing tenants' ability to choose, obtain, and keep housing. It focuses on helping tenants meet their lease obligations, including paying rent, maintaining a safe and healthy living environment, allowing others the peaceful enjoyment of their homes, and complying with the terms and conditions of the lease.
3. **Assertive outreach and engagement.** Some tenants are reluctant to accept help, suspicious of promised benefits, and feel hopeless about their future. The service team uses a variety of outreach and engagement techniques that bring severely disenfranchised people into helping relationships. The most effective approaches include an attitude of respectful persistence, meeting the person's real and immediate needs, and helping the person address difficulties one step at a time.
4. **Case management.** Skilled and flexible case managers most often serve as the bridge between tenants and the supports that help them achieve stability and long-term tenancy. Case managers

first build trust, then help tenants select and obtain the supports that will work best for them. Ideally, caseloads are no more than 15 tenants to each case manager.

5. **Recovery supports.** The service team works with tenants to promote long-term stability, recovery, and a sense of themselves as contributing community members. The services that they provide directly or arrange for on behalf of tenants fall under three broad categories:
- Mainstream supports, including income supports and entitlements from public benefits programs, health care from hospitals and clinics, and employment help from vocational agencies.
 - Specialized supports that help tenants succeed in accomplishing their goals, such as life skills training, budgeting, medication management, and behavioral health treatment.
 - Natural supports, including connections with peers, family, community, and faith communities. A growing number of supportive housing providers recognize the importance of integrating formerly homeless people as members of their service teams. The advantages of peer support include increased empathy and understanding based on shared experiences, offering supportive housing tenants a living model of recovery, and helping organizations to be consumer-focused. Many supportive housing providers use evidence based practices (EBPs) in the delivery of services to tenants. The most frequently used include:
 - Housing First, in which housing is offered with no preconditions;
 - Motivational Interviewing, which enables the provider to take the tenant's readiness to change into account and to reinforce the tenant's own incentives for change;
 - Integrated Treatment for Co-occurring Disorders, which provides and integrates treatment for both substance abuse and mental health issues;
 - Assertive Community Treatment, which uses a team approach to meet participants' diverse needs;
 - Illness Management and Recovery, which enables tenants to manage their own symptoms; and
 - Supported Employment, which helps tenants take advantage of appropriate opportunities for mainstream employment.

Perhaps the most important aspect of the supportive housing service approach is that the service team goes the extra mile to help tenants succeed. Instead of putting the burden of success solely on the person being served, service teams adopt a partnership attitude and are willing to step outside the boundaries of conventional services.

Outcomes/Results:

Available data reinforce evidence that permanent supportive housing is an effective approach for meeting the needs of people with disabilities and chronic health conditions who have experienced homelessness. Research indicates that this combination of long-term housing and wraparound services leads to improved residential stability and reduction in psychiatric symptoms. Studies have also found that supportive housing is associated with significant reductions in costs for emergency room visits, hospitalizations, shelters, sobering centers, jails, and other public services used by people experiencing homelessness.

An Evidence Based Practices (EBP) KIT on Permanent Supportive Housing is available from SAMHSA to provide tools to support the implementation of Permanent Supportive Housing for

people with mental illness. The Kit contains a summary of research evidence. The KIT is available in a CD-ROM / DVD version or can be downloaded from the web.

Resources:

The Corporation for Supportive Housing's Seven Dimensions of Quality for Supportive Housing and accompanying assessment and resource tools.

SAMSHA's 2010 Annual Report of findings from its Services in Supportive Housing program.



The City of Columbus

P.O. Box 87 • Columbus, Texas 78934 • 979-732-2366 • 979-732-8213

October 3, 2014

Texas Department of Housing and Community Affairs
P O Box 13941
Austin, Texas 78711-3941

Re: Consolidated Plan

To Whom It May Concern:

I am writing to make comment on the 2015-2019 Consolidated Plan and the HOME Program Single-family Reservation Program. The City of Columbus has been very successful with the HOME Housing Rehab Assistance program in the past. It is very important to rural communities such as ours.

The current system of funding is causing hardship for the very homeowners the program is task to assist. When we were awarded a Reservation System Contract we immediately started publicizing the program and took applications not long after. We have had homeowners ready to assist since the attempted June release of funds. As you know, those funds were never released due to problems with the TDHCA computer systems. We then tried to setup the households during the September and October release of funds but, apparently, were not fast enough in pressing the submit button (even though we were signed on and trying the second the system opened up for submittal).

It is very difficult to tell these homeowners that, yes, you did everything that is required to qualify for assistance but we can't access funds to help you. And we have no way of knowing when, if ever we will be able to get any money despite having a contract with the state.

I strongly encourage TDHCA to return to the award of contracts, guaranteeing funding for a certain number of homes. To address TDHCA's expenditure concerns do not fund the contracts until 12-months after award.

We suggest the following contract benchmark wording to ensure TDHCA's expenditure rate remains as high as it has been under the current reservation system:

Benchmarks

Performance under the Contract term will be based on the following benchmarks from the Contract begin date:

- a. Month 12 contract is funded for full amount.
- b. Months 12 - 15, initial five homes to be assisted must be setup in the TDHCA Contract system.
- c. Month 16, Administrators with five homes setup in the TDHCA Contract system may access reservation funds to setup up to two additional homes, if sufficient funds are available in the Reservation system.
- d. Months 17, Administrators with seven homes setup in the TDHCA Contract system may access available reservation system funds to setup an additional three homes (for a potential total of 10-homes)
- e. Month 26, 100% of construction must be completed for all Households to be assisted.
- f. Month 28, 100% of construction funds drawn and match requirement (if any) supplied
- g. Month 30, 100% of all funds drawn.

Using this method would allow us to reassure our citizens that a certain number of applicants will be assisted. The current reservation method is a gamble, making it difficult to get funding to assist any homeowners before the funds are gone.

In addition this will allow for Administrators and Consultants to budget and plan ahead. Applications have to be taken, appraisals paid for, and title commitments obtained before a setup can occur. These, and other necessary steps, cost quite a bit of money.

The current system asks that these expenses be incurred without any assurance of reimbursement. It is entirely feasible, if not likely, that multiple households will be qualified and ready to setup but will not be some of the lucky few that get to access the funds. If this continues those costs are taken from very tight city budgets with no hope of reimbursement.

The HOME Rehabilitation Assistance Program is a very good thing not only for the homeowner but for neighborhoods and cities as a whole. The one caveat to that statement is for HOME to have a positive impact homes must be rehabilitated or reconstructed; otherwise it is an exercise in frustration for homeowners and Administrators.

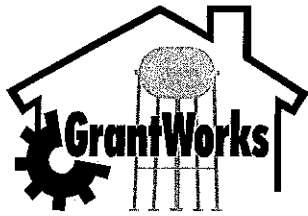
Just to be clear, I have nothing but praise for Jennifer Molinari and the team she has put together. My only concern is with the Reservation System method of funding households. Thank you for your consideration in this matter.

Sincerely,



City of Columbus

cc: Jennifer Molinari



*Planning, Housing, and
Community Development Services
for Rural Texas Since 1979*

2201 Northland Drive Voice (512) 420-0303 x333
Austin, Texas 78756 Fax (512) 459-8948
www.grantworks.net tres@grantworks.net

October 6, 2014

Consolidated Plan Public Hearing Comments

My comments are in reference to the HOME Program Single-family Reservation System. The HOME Housing Rehab Assistance (HRA) activity is very important to rural communities throughout the state.

Under the current Reservation System it is not possible to adequately plan and budget since there is no way to predict the number of homes that can be assisted in any single community.

The cost of getting a household to the point that it is ready to setup is very high: Applications must be taken, homeowners have to be worked with on an individual basis, area wide and site-specific environmental clearance must be obtained, appraisals have to be paid for, and clear title commitments must be acquired. This process is time consuming and very expensive. The current system is unsustainable as it provides no assurance of funding.

I strongly encourage TDHCA to return to the award of contracts to guarantee access to funding for a certain number of homes. To address the Department's expenditure concerns do not fund the contracts until 12-months after contract award. This will allow time to qualify homeowners without slowing down expenditure rates.

I suggest the following contract benchmark wording to ensure TDHCA's expenditure rate remains as high as it has been under the current reservation system:

Benchmarks

Performance under the Contract term will be based on the following benchmarks from the Contract begin date:

- a. Month 12 contract is funded for full amount.
- b. Months 12 - 15, initial five homes to be assisted must be setup in the TDHCA Contract system.
- c. Month 16, Administrators with five homes setup in the TDHCA Contract system may access any unused funds to setup up to two additional homes, if sufficient funds are available. Thus creating a hybrid Reservation system.
- d. Month 17, Administrators with seven homes setup in the TDHCA Contract system may access available reservation system funds to setup an additional three homes (for a potential total of 10-homes)
- e. Month 26, 100% of construction must be completed for all Households to be assisted.
- f. Month 28, 100% of construction funds drawn and match requirement (if any) supplied
- g. Month 30, 100% of all funds drawn.

Using this method will keep TDHCA's expenditure rate on par with what it is currently. It will also allow rural communities to benefit from the savings associated with economies of scale. Under this system consultants and Administrators can continue to front the money necessary to qualify households, as there is a reasonable expectation for reimbursement.

The current model is economically infeasible for rural communities, consultants, and nonprofits. Not to mention that it is very hard on homeowners. They make application and follow-up with the multiple documents needed to qualify yet we are unable to provide any timeframe for, or assurance of, assistance.

I would like to take this opportunity to commend the current HOME Program Staff and the HOME Program Director for their willingness to work with us and the Administrators around the state. They have been very helpful in trying to work through the current challenges with the Reservation System.

Sincerely,

A handwritten signature in black ink, appearing to read "Tres Davis". The signature is fluid and cursive, with a large initial "T" and "D".

Tres Davis
V.P. GrantWorks, Inc.

RANDY MALOUF – BUILDER

(936) 588-6331

**PO Box 813
Conroe, TX 77305**

September 30, 2014

Texas Department of Housing and Community Affairs
P O Box 13941
Austin, Texas 78711-3941

Re: Consolidated Plan

To Whom It May Concern:

I am a contractor who works with Administrators on the HOME Program Single-family Rehabilitation and Reconstruction Program. I would like to make comment for the consolidated plan in regard to the current system of funding HOME Housing Rehab.

The current funding method of funding is creating hardships for contractors. Under the old system there was an economy of scale where I could bid a block of homes with the hope of being awarded multiple homes in a city. Under the current system, I do not know if a city will be awarded funds to assist one homeowner or multiple.

As it stands now, I will need to increase the amount of my bids to hedge against being awarded only a single home in a community. It cost money to submit a bid and bids are area specific. Without any assurance that a city will be able to access funds within 90-days of the bid due date, it becomes increasingly difficult to justify continuing to bid on houses trying for assistance from the HOME Program.

The current system is costing small independent contractors such as myself money and will force good contractors to stop participating in the program.

It is my understanding that a first setup - first served system has been suggested by others. That would be one way of addressing my concerns. The current system is not first come-first served; it is first able to press a button on a certain date and time – first served. This puts many rural cities with limited staff at a real disadvantage.

The HOME Program is a very good program that benefits many homeowners around the State. It will be even better once TDHCA gets the funding methodology sorted out.

Thank you for your consideration in this matter.

Sincerely,



Randy Malouf

cc: Jennifer Molinari



REFUGIO COUNTY JUDGE'S OFFICE

September 30, 2014

Rene Mascorro

County Judge

Letitia Wright

Administrative
Assistant

Texas Department of Housing and Community Affairs
P. O. Box 13941
Austin, Texas 78711-3941

Re: Consolidated Plan

To Whom It May Concern:

I am writing in reference to the 2015-2019 Consolidated Plan and the HOME Program Single-family Reservation Program. The HOME Housing Rehab Assistance program is very important to rural communities throughout the state and has been very beneficial to Refugio County.

The current system of funding is unsustainable. It is not possible to adequately plan when there is no way to tell how many homes will be funded at any given quarter. I strongly encourage TDHCA to return to the award of contracts, guaranteeing funding for a certain number of homes. To address the Department's expenditure concerns do not fund the contracts until 12-months after contract award.

We suggest the following contract benchmark wording to ensure TDHCA's expenditure rate remains as high as it has been under the current reservation system:

Benchmarks

Performance under the Contract term will be based on the following benchmarks from the Contract begin date:

- a. Month 12 contract is funded for full amount.
- b. Months 12 - 15, initial five homes to be assisted must be setup in the TDHCA Contract system.
- c. Month 16, Administrators with five homes setup in the TDHCA Contract system may access reservation funds to setup up to two additional homes, if sufficient funds are available in the Reservation system.
- d. Month 17, Administrators with seven homes setup in the TDHCA

Mailing Address:

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Office Fax:

(361) 526-5100

Contract system may access available reservation system funds to setup an additional three homes (for a potential total of 10-homes)

- e. Month 26, 100% of construction must be completed for all Households to be assisted.
- f. Month 28, 100% of construction funds drawn and match requirement (if any) supplied
- g. Month 30, 100% of all funds drawn.

Using this method would allow rural communities to benefit from the savings associated with economies of scale. It is very difficult to build a home within the budget proscribed by TDHCA. It is possible to stay in budget when a builder bids in such a way that he can have multiple homes under construction within a limited geographical area. The current reservation method is a gamble, making it difficult to get funding for more than a single house before the funds are gone.

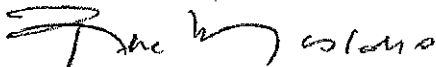
In addition this will allow for Administrators and Consultants to budget and plan ahead. Applications have to be taken, appraisals paid for, and title commitments obtained before a setup can occur. These, and other necessary steps, cost quite a bit of money.

The current system asks that these expenses be incurred without any assurance of reimbursement. It is entirely feasible, if not likely, that multiple households will be qualified and ready to setup but will not be some of the lucky few that get to access the funds. If this continues those costs are simply borne by the rural communities that you are task to serve. This is a formula to keep small and poorer communities from participating in the HOME Program.

I would also like to take this opportunity to commend the current HOME Program Director, Jennifer Molinari, for her professionalism and willingness to work with Administrators. We have seen a huge improvement in efficiencies and attitudes since she was appointed to the position.

Thank you for your consideration in this matter.

Sincerely,



Rene Mascorro
Refugio County Judge

cc: Jennifer Molinari



550 Earl Garrett Street, Suite 116, Kerrville, TX 78028

Phone: (830)895-0735 Fax: (830)895-0911

Web: www.hchoctx.org E-mail: hchoc@windstream.net

TDHCA
PO Box 13941
Austin, Texas 78711-3941

October 4, 2014

Dear Sir or Madam:

This letter is with regard to the TDHCA Reconstruct program and how the present system is not working for our agency. We are the Hill Country Home Opportunity Council, Inc. and we cover a four county area: Kerr, Kendall, Bandera and Gillespie Counties. There is a great need for Reconstruct projects as many of our citizens are extremely low to low-income homeowners living in substandard housing, and they need the Reconstruct program.

The present reservation system is not working for us, in that, we are a small agency with limited funding, and we are unable to expend funds for engineers, surveys, house plans, etc. not knowing when or if TDHCA will have enough funds allotted to complete a site-built home or MHU to MHU project. We have three homebuyers on our waiting list at this moment: one we have not started, but who is hopeful; one with a completed environmental; and one applicant who has waited for more than three years. The homeowner furthest along is displaced from her home due to condemning circumstances, and TDHCA has had no available funds for us to move forward. Thus, with the time involved, the tying up of our funds, and all the uncertainty regarding funding from TDHCA, our board is now considering contracting out the management of the TDHCA Reconstruct programs for us.

My suggestion is to allow applicants to submit applications and supporting documentation when they are ready, and the State adds the applicants to a list of projects waiting for funding, per territory. That way, I can log into your website, look at the list and give my homeowners and my Board a better idea how much longer we need to wait. At the time of funding, we can update bank statements, applications, etc. or any updated documentation TDHCA needs. I think this system will also assist the state in deciding what district to allocate funds to.

I thank you for your time and consideration to my suggestion.

Sincerely,

A handwritten signature in cursive script, appearing to read "Teresa Offutt".

Teresa Offutt – Executive Director
Hill Country Home Opportunity Council, Inc.
Kerrville, TX 78028



motivation education & training, inc.

Austin Office
1811 West 38th Street
Austin TX 78731 Telephone:
512-965-0101 Fax
number : 512-374-1657

October 6, 2014

Mr. Tim Irvine
Texas Department of Housing and Community Affairs
PO Box 13941
Austin, TX 78711-3941

RE: Comments related to the *Draft 2015-2019 State of Texas Consolidated Plan*

Dear Mr. Irvine,

We appreciate the opportunity to comment on TDHCA's *Draft 2015-2019 State of Texas Consolidated Plan*. Motivation Education & Training, Inc. MET is a private nonprofit 501(c)(3) organization funded by a variety of public and private grants and contracts. The agency was incorporated in 1967 and operates on a statewide basis in Texas. The organization was founded for the purpose of providing academic and vocational training to migrant and seasonal farm workers, with the objective of furthering economic self-sufficiency for MET participants. MET has conducted programs to improve farmworkers' housing situations since the 1970's.

Regarding the draft *Plan*, the report makes notes of farmworkers several times. The Bowen National Research's *Texas Rural Farmworker Housing Analysis* (September 2012) is noted as a resource in the bibliography. However the discussion about farmworkers is very sparse and the term "migrant farmworkers" is not well distinguished from the more general "farmworker" term. MET recommends that as a special needs group, the more inclusive term of "farmworker" or "migrant and seasonal farmworkers" be used, rather than restricting the special needs group to migrant farmworkers. It is true that migrants face additional housing challenges while seeking shelter when away from home for work. However, as described in the needs assessment section, all farmworkers including non-migrant seasonal workers, live in "run-down apartments, overcrowded conditions, families forced to share limited housing, and families living in shacks, barns, outdated trailers or camping along riverbanks or in orchards." (Needs Assessment page 52).

I was a bit confused by the statement in the draft *Plan* that "While not specifically designated as 'special needs,' the State is directed statutorily to gather data on farmworkers" (Executive Summary, page 2). The *Plan* later notes that "TDHCA has several special needs populations that receive priority in its programs" (Market Analysis, page 3) which includes migrant farmworkers, and migrant farmworkers are also noted as a special needs population for the HOME program. I am unaware that the State is directed statutorily to gather data on farmworkers, and would appreciate knowing more about this.

MET is providing comments that relate specifically to how TDHCA HOME and other programs could better serve Texas farmworkers. Many of our recommendations result from an input-producing process through annual statewide Farmworker Housing Summits that bring together a broad spectrum of stakeholders to each of four gatherings since MET began sponsoring these meetings in 2004. Several of the recommendations are repeated from earlier input. We hope you will enlist us to better serve the hard-working farmworker population who does not adequately benefit from TDHCA programs. Below please find several recommendations:

1. Ensure timetables for HOME funding and those for other TDHCA programs match those to leverage USDA funding. Applications to USDA for farm labor housing (Section 514/516) require leverage funding and are competitively scored nationally. Committed leverage funding is a significant scoring factor. Applications need to show funding approvals prior to application submittals to USDA and firm funding commitments within one year of USDA approval. We recommend a special program provide conditional commitments that allow the state to be the first funding conditionally committed to attract the federal funding to Texas. Because HOME funding needs to be project-ready before obtaining Board approval, funding cycles have not jived with farm labor housing application deadlines. This put Texas applicants at a disadvantage in competing nationally for funds. California, Florida, Washington, and Oregon all have state grant and loan programs geared to work specifically with Section 514/516. Although Texas ranks second among states in the number of farmworkers, Texas applicants have not had ready access to TDHCA resources to attract Section 514/516 to the state. Such a program needs to be developed. Not having timely funding commitments is an important factor that has put Texas at a disadvantage in attracting our fair share of federal farm labor housing funds to the state.
2. In addition to timing, funds to leverage USDA funding (or to serve farmworkers using other program resources), need to be flexible. In some cases grants are required. Predevelopment funding is often lacking. Early commitments are essential.
3. Implement the recommendations cited in the *Texas Rural Farmworker Housing Analysis*, and provide leadership to bring recommendations into fruition in the state. The draft *Plan* cites the study in the bibliography and Needs Analysis, but does not comment on the how the Department can facilitate incorporating the recommendations in its programs or through other state actions.
4. Migrant farmworkers are included as a special needs group within the HOME program, but according to the Annual Progress Reports for program years 2005 through 2013 *only 15 migrant farmworkers were served* during these combined nine years of service delivery! This is a truly pathetic representation of the nearly 400,000 farmworkers in Texas, and demonstrates that the Department is not effective in providing or requiring outreach and is not serious about its inclusion of farmworkers as a special needs population (see attached summary of past Annual Progress Reports).

MET has four suggestions:

- a. Perhaps “special needs” is not the category in which farmworkers are best represented. MET recommends establishing a small program specifically for farmworkers or inclusion of farmworkers in a workforce housing program.
- b. Second, better outreach is needed to the farmworker population in order to assist more than a handful of members of the farmworker population. Studies show farmworkers are often an invisible population and do not step forward to take advantage of social services or other programs. Aggressive outreach is needed.

- c. Third, require tracking to reliably account for the number of farmworkers actually served with HOME funds. It is very possible that more farmworkers were served and the 15 farmworkers reported to be in assisted units could be an undercount. If the Department is serious about including farmworkers in the special needs category, it needs to be certain that it is indeed serving this population and adequately tracks their benefitting with assisted units.
- d. As discussed earlier, a very simple suggestion is to change the “migrant farmworker” designation to “migrant and seasonal farmworker” (MSFW) or simply “farmworker”. This term is consistent with sources quoted in the discussion of farmworkers in the *State of Texas Analysis of Impediments to Fair Housing Choice* and the term used in the *US National Agricultural Workers Survey* and other federal programs. Seasonal farmworkers, who work within commuting distances, often have lower incomes than migrant farmworkers, who follow the work and obtain more jobs, and thus earn more income, within a year. Limiting the population to migrant farmworkers excludes some of the poorest farmworkers who have a desperate need to access better homes. I suspect it is not the Department’s intention to exclude a population that is specifically mentioned in its own *Analysis of Impediments*.
5. Assign a TDHCA staff person to provide assistance to organizations providing, or attempting to provide farmworker housing and other rural housing options; the staff person would need to understand the farmworker population and range of housing requirements (including temporary residency and permanent housing options such as rental and ownership). The capacity among providers is mixed and efforts to build capacity should be strengthened.

Thank you for the opportunity to comment. Please contact me if you have any questions or need clarification on any of these suggestions. MET would be happy to continue to work with TDHCA on these or other initiatives that benefit Texas farmworkers. We appreciate the efforts the Department has made to learn more about farmworker housing needs. We need to continuing working together to get past investigative stages. We need to work harder to actualize programs that truly improve housing options for the state’s farmworker population.

Sincerely,



Kathy Tyler
Housing Services Director

Migrant Farmworkers Served Annually - as part of HOME Special Needs Population

Prepared by MET Inc using State of Texas Consolidated Plan Annual Performance Reports (CAPERs) accessed from TDHCA website

*"In the One Year Action Plan, TDHCA had a goal of allocating a minimum of 20 percent of the annual HOME allocation to applicants serving persons with special needs. Persons with "special needs" include homeless persons, elderly persons, persons with disabilities, persons with AIDS and AIDS-related diseases, victims of domestic violence, persons with alcohol and/or drug addictions, colonia residents, and **migrant farmworkers**. Eligible applicants include nonprofits, units of general local government, and PHAs with documented histories of working with special needs populations. Eligible activities include homebuyer assistance, homeowner rehabilitation, and tenant-based rental assistance."* (italics and bold added)

Reporting on Program Year	Assisted Units		Percentage		Report Dated
	Total Special Needs Population	Migrant Farmworkers	(Farmworkers to All Special Needs)		
2005	2,142	2	0.09%		April 2006
2006	2,361	6	0.25%		April 2007
2007	2,464	1	0.04%		April 2008
2008	1,296	2	0.15%		April 2009
2009	382	0	0.00%		April 2010
2010	463	4	0.86%		April 2011
2011	1,014	0	0.00%		May 2012
2012	1,426	0	0.00%		May 2013
2013	721	0	0.00%		May 2014
	12,269	15	0.12%		

MET's Recommendations:

1. Establish a program specifically for farmworkers or inclusion of farmworkers in a workforce housing program
2. Improve outreach to the farmworker population
3. Improve tracking to reliably account for the number of farmworkers actually served
4. Change the "migrant farmworker" designation to "migrant and seasonal farmworker"

SafeHaven TARRANT COUNTY

October 8, 2014

Public Hearing – Draft 2015-2019 State of Texas Consolidated Plan
Fort Worth Public Library

SafeHaven of Tarrant County would like to thank the Texas Department of Housing and Community Affairs for hosting local hearings and the opportunity to provide public comment on the Draft State of Texas Consolidated Plan.

There is a strong connection between domestic violence and homelessness. As such, building solutions for survivors of domestic violence and their families requires understanding the connections between homelessness and violence against women. Victims of domestic violence suffer not only the physical violence but also the devastation of displacement from their homes. As a result, affordable housing issues become a serious consequence of domestic violence.

An unintended consequence of the decision to transfer the funding priority for Emergency Solution Grant program to the local Continuums of Care is that victims of domestic violence are not included in the scoring goals to maximize the available HUD funding based on the current national priority of serving the chronically homeless. This leads to less availability of HUD funding for family violence shelters and transitional housing funds dedicated to domestic violence.

The use of family violence shelters and transitional housing programs has shown to be very successful in providing positive outcomes. In the past year and ½, SafeHaven of Tarrant County has graduated from its transitional housing program 19 survivors of domestic violence. During this time, they were able to move from dangerous, abusive situations into stable, supportive transitional housing, ultimately moving into permanent housing. They paid down over \$53,000 in debt, and saved an additional \$50,000. Several were able to purchase vehicles, providing additional independence, and the ability to resume a life free from violence.

SafeHaven recommends including priorities, scoring methods, and outcomes that match the needs of family violence survivors and recognize the unique barriers they face. We recommend maintaining the allowance for family violence programs to utilize ESG funds to support emergency shelters and transitional housing as, for family violence services specifically; these efforts have proved to have highly successful outcomes through the years. Emergency family violence shelters and transitional housing programs must exist to allow victims and survivors to flee abusive relationships and have appropriate and available domestic violence specific housing options and supportive services. The trend of limiting these long successful funding opportunities for family violence programs represents one of the most significant areas of the Plan in need of augmentation and greater attention.

Thank you again for the opportunity to provide feedback on the State of Texas Consolidated Plan.

SafeHaven of Tarrant County

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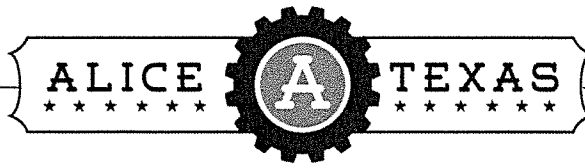
President & CEO

Mary Lee Hafley, M.Ed.



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POSITIVE | ENERGY

October 9, 2014

Texas Department of Housing and Community Affairs
Housing Resource Center
P.O. Box 13941
Austin, Texas 78711-3941

Re: Comments on Draft 2015-2019 State of Texas Consolidated Plan/Community Development Block Grant Program

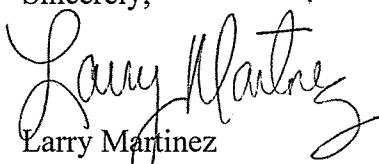
The City of Alice and the Alice-Jim Wells County Economic Development Corporation (EDC) support the Needs Assessment finding that there is a large demand for community infrastructure; especially critical to South Texas Communities are water, wastewater and streets. At its public hearing this summer, our Coastal Bend Regional Review Committee again set water, sewer, streets as funding priorities for the Community Development Block Grant Program (CDBG).

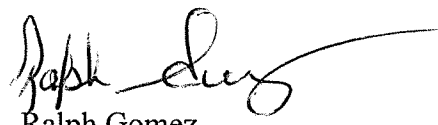
As shown on page 58 of NA-05, "Overview," the most requested services for the 2013-2014 CDBG cycle were water facilities, sewer facilities, and street improvements.—67% of the total amount requested. Based upon the needs in our and neighboring communities, we believe this trend will continue. Therefore, we ask that the State continue allocating, the largest percentage of CDBD funds to the Community Development Fund and also ask the State to consider increasing that percentage.

We also support allowing regions to set priorities regarding the CDBG Program since local needs can be more readily identified and addressed at this level.

When the Texas Department of Agriculture revisits proposed changes to the CDBG Program—funding cycle, scoring, etc.—we will offer comments at that time.

Sincerely,


Larry Martinez
Mayor


Ralph Gomez
President, Alice-Jim Wells County EDC

cc: Suzanne Barnard, State Director, CDBG Program
Barbara Reaves, Grant Developer, City of Alice

DISCOVERALICE.COM



ENHANCING COMMUNITIES
THROUGHOUT TEXAS

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Deborah Dennis
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Brazos Valley Affordable Housing
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Annie Jones Evans
South Fair CDC

Delia Martinez
El Paso Collaborative

Gary Lindner
PeopleFund

Matt Hull
Executive Director

October 13, 2014

Jennifer Molinari
HOME Program Director
TDHCA
221 E. 11th Street
Austin, TX 78711 – 3941

Ms. Molinari,

Please accept these comments from the Texas Association of Community Development Corporations regarding the 2015-2019 Consolidated Plan.

TACDC’s members build affordable housing across Texas and are appreciative of the efforts TDHCA goes through to ensure equal access to federal funds administered by the agency. After reviewing the draft Consolidated Plan for 2015-2019, we have one main concern what we would like to see addressed.

The Draft 2015-2019 Consolidated Plan appears to leave out using HOME funds for homebuyer assistant for low income families in the 2015 Action Plan. We feel this is a terrible mistake as homebuyer and down payment assistance is an integral part of purchasing a home for lower income Texans. The plan states that the reason for not recommending funding is that down payment assistance is readily available from other sources. However, it would appear that the down payment assistance referred to is only tied to certain mortgage bond programs. Buyers would not qualify for down payment assistance if they brought their own third-party financing or local lender to the purchase.

The argument that the state shouldn’t invest in down payment assistance because there are other sources available falls apart upon closer examination. If this test were applied to the other HOME single family programs, we would see that there are also other funds available for homeowner rehabilitation (Bootstrap, FHLB, Texas Veterans Fund, NSP PI, etc.) as well as tenant based rental assistance (Section 8 vouchers, vouchers from HHS, Veterans Assistance Fund, etc.).

Using the entirety of the non-CHDO HOME single family funds for rental housing will not encourage lower income families to responsibly build assets and enjoy the financial and social benefits of homeownership.

Please ensure that a portion of HOME funds are made available each year for down payment assistance available to all low-income Texans. Increasing the homeownership rate among lower income residents in Texas should be a priority as long as the opportunities for homeownership are affordable and in the best interest of the borrower.

Please contact me if you have any questions regarding our comments.

Sincerely,

Matt Hull
Executive Director



October 13, 2014

Elizabeth Yevich, Director
Housing Resource Center
Texas Department of Housing and Community Affairs
221 East 11th Street
Austin, Texas, 78701

RE: Draft 2015-2019 State of Texas Consolidated Plan

Dear Ms. Yevich:

Below please find Texas Appleseed and Texas Low Income Housing Information Service's (TxLIHIS) comments on the Draft 2015-2019 State of Texas Consolidated Plan (Con Plan). Our comments will focus on the ways in which the Con Plan incorporates and furthers the objectives of the State's Analysis of Impediments to Fair Housing Choice (AI), however, we note that the State's AI is still under review by HUD, and our organizations have previously submitted to TDHCA and HUD extensive comments on compliance issues in the submitted Draft AI.¹

Under the Fair Housing Act and 24 CFR §91.325(a), "[e]ach State is required to submit a certification that it will affirmatively further fair housing, which means that it will conduct an analysis to identify impediments to fair housing choice within the State, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting the analysis and actions in this regard."² The Con Plan lays out how the State intends to use CDBG, HOME, ESG, and HOPWA funds to "take appropriate actions to overcome the effects of any impediments identified through that analysis." The State in fact has a *dual responsibility* to affirmatively further fair housing. It must engage in its own activities that affirmatively further fair housing, and must also ensure that any subrecipient jurisdictions to which it is providing funds comply with their individual certifications in order to affirmatively further fair housing.³

¹ Which we incorporate by reference, but will not repeat in these comments.

² The State must also certify that it is in compliance with anti-discrimination laws (24 CFR §91.325(b)(5)).

³ See e.g. HUD OFFICE OF FAIR HOUSING AND EQUAL OPPORTUNITY (FHEO), FAIR HOUSING PLANNING GUIDE: VOLUME 1 at 3.3-3.49, Chapter 3: Fair Housing Planning Guidelines for States and State-Funded Jurisdictions, (#HUD-1582B-FHEO).

Increasing access to affordable housing for low-income Texans must include consideration of the location of that housing in order to both comply with the State's certification that it is affirmatively furthering fair housing and to ensure that the State's investment of public funds is most efficient and effective. Continuing State investment in affordable housing solely in minority-concentrated and high-poverty areas with limited access to education and jobs and increased exposure to crime and environmental hazards deprives low-income families of equal access to community assets that help improve outcomes for individual families and reduce poverty overall. In addition, many of the populations identified as "special needs" are also members of protected classes under the FHA on the basis, for example, of sex, familial status, or disability.

In its "Anti-Poverty Strategy," the State again fails to acknowledge that the location of housing and infrastructure investment is a major determinant of current and future poverty. Neither increasing access to affordable housing, providing equitable access to housing programs, nor awarding CDBG funds to principally benefit LMI persons (although the State's 93% level of funding for projects that benefit LMI persons is excellent) are sufficient in themselves to reduce poverty or affirmatively further fair housing. These investments of public funds must be made in a way that increases access to opportunity in order to comply with the State's certification and to be most effective in carrying out the State's goals.

TDHCA notes that it often pairs HOME Multifamily funds with housing tax credits, which not only leverages those funds to produce a more efficient use of resources, but means that those funds are expended on projects that are specifically scored on the basis of access to opportunity or, alternatively, on the presence of real and meaningful community revitalization. This is not presented as an action that affirmatively furthers fair housing, but it is a significant and meaningful one.

Equally important to increasing housing choice in high-opportunity areas is the investment of infrastructure, public facilities, and public services funds in historically disinvested communities in order remedy past discrimination and provide equal access to community assets for all Texans.⁴ While there may be strong correlation between worst-case infrastructure and public facilities needs and concentrations of protected classes under the Fair Housing Act, the State must explicitly consider how its investment of infrastructure funds affirmatively furthers fair housing. An analysis of how and where past CDBG and other housing and community development funds have been spent in the past (identified as an action step in the State's Phase 1 AI and incorporated into the Phase 2 Draft) would help the state determine whether its past and current procedures have resulted in a fair distribution of resources and whether changes are necessary to ensure fair outcomes.

For example, the issue of scoring criteria that disadvantage smaller communities by requiring an expenditure of resources they are less likely to have, an issue raised by a number of

⁴ The Con Plan states that "TDHCA and TDA do not provide priorities for allocating investment geographically to areas of minority concentration," without providing any explanation for not using this factor.

communities in response to the now postponed proposed changes to the Community Development Fund scoring criteria, was first raised in a fair housing context in September 2010.⁵ The issues of (1) whether certain scoring criteria are a barrier to entry for small communities; (2) what is the most appropriate data to use to get an accurate picture of smaller and/or rural communities; and (3) the importance of level of need and project impact⁶ as criteria are all meaningful and important, and we support TDA's decision to delay the new criteria for further review and stakeholder input.

In addition, TDA's review should evaluate how its CDBG scoring criteria and priority-setting process incentivize decisions that may disadvantage groups of persons protected under the Fair Housing Act. The Con Plan notes that rural communities often choose to use CDBG funds for public facilities like community centers or senior centers over their public infrastructure needs. Without denying the need for public facilities, if the scoring criteria push communities to prioritize projects that, for example, serve the largest number of people or are more politically popular over badly needed infrastructure projects that might have the most impact on specific neighborhoods or communities, those criteria may raise civil rights and fair housing issues.⁷ The State acknowledges in the Con Plan that "Regional Review Committees determine priorities for awarding most of the funds, which promotes local control but **can result in certain types of communities being less competitive in the application process**" (SP p. 49, emphasis added).

This is not only an issue for the State's certification that it is affirmatively furthering fair housing (24 CFR §91.325(a)(1)), and its certification of compliance with anti-discrimination laws (24 CFR §91.325(b)(5)), but for its certification that the action plan has been developed "so as to give the maximum feasible priority to activities that will benefit low- and moderate- income families," (24 §91.325(b)(4)(i)).

TDA and TDHCA's CDBG Colonias Set-Aside program, which (1) prioritizes basic human needs, particularly water and sewer infrastructure; (2) seeks to co-ordinate housing and infrastructure spending; and (3) targets funding to a specific protected class that has been historically segregated, is another example of how the State is taking meaningful action to address an impediment to fair housing choice identified by the Draft AI. As part of the CDBG Disaster Recovery program for Hurricane Dolly, the Texas Water Development Board is currently conducting a study of colonia drainage needs which will reduce the demands on local entities and TDA to identify and prioritize these projects to increase the efficient use of resources.

The importance of location is acknowledged in the Annual Plan, which includes in its description of CDBG goals the following description of how proposed projects should be

⁵ At the time, the Texas Department of Rural Affairs, and not TDA, administered the CDBG program.

⁶ It is, however, critical that "project impact" not be defined solely by the number of persons benefitted. For example, a water or sewage infrastructure project might benefit a smaller number of households than a park open to the entire community, but the impact of the infrastructure project would be much greater, particularly in terms of furthering the goals of the CDBG program and the State's stated priorities.

⁷ We recognize that scoring criteria, as affirmed by commenters, have different effects on communities of different sizes.

evaluated:

The Texas CDBG encourages the use of funds not only to improve existing locations but to provide facilities in other areas to accommodate residential opportunities that will benefit low and moderate income persons. Applicants are encouraged to provide for infrastructure and housing activities that will improve opportunities for low and moderate income persons. When considering projects and designing projects, applicants must continue to consider affirmatively furthering fair housing, which includes providing basic infrastructure, such as water, sewer, and roads that benefit residential housing and other housing activities.

The Annual Plan also includes several action steps connected to identified impediments to fair housing choice in Section 75 of its Annual Plan. We wish to acknowledge the inclusion of these steps and other actions (several noted above) that affirmatively further fair housing, but note that these considerations must be incorporated into both the planning process and the Con Plan as a whole. Affirmatively furthering fair housing is not a siloed category of analysis and action, but an integral part of determining how public resources are allocated and spent.

Thank you for your consideration.

Sincerely,

John Henneberger, Co-Director
Texas Low Income Housing Information Service

Madison Sloan, Director, Disaster Recovery and
Fair Housing Project
Texas Appleseed



October 13, 2014

Texas Department of Housing and Community Affairs (TDHCA)
Draft 2015-2019 State of Texas Consolidated Plan

Written Testimony: Texas Council on Family Violence and Constituent Programs

The Texas Council on Family Violence (TCFV) is the statewide domestic violence coalition with a mission to promote safe and healthy relationships by supporting service providers, facilitating strategic prevention efforts, and creating opportunities for freedom from domestic violence. Additionally, TCFV – a membership organization – represents over 100 family violence programs and nearly 1,000 individual Texans dedicated to creating safer options and freedom from family violence.

TCFV appreciates the opportunity to provide public comment on the Draft 2015-2019 State of Texas Consolidated Plan (“the Plan”) and looks forward to working together with the Texas Department of Housing and Community Affairs (TDHCA) and other stakeholders to identify, and work towards, solutions to enhance current collaborative efforts to foster safety and housing stability for survivors of family violence. We offer these comments on behalf of both TCFV and 12 family violence programs across Texas who have signed on in support of these public comments.

Making the Connections

A strong connection between domestic violence and homelessness unfortunately pervades survivor experiences in Texas and across the nation. According to the United States Interagency Council on Homelessness (USICH), among families currently experiencing homelessness **more than 80%** previously experienced domestic violence.¹ Further, research conducted by the National Law Center on Homelessness and Poverty shows that, depending upon the region, between 22% and 57% of women experiencing homelessness report that domestic or sexual violence was **the immediate cause of their homelessness**.²

Additionally, on September 17, 2013, Texas family violence programs participated in the 2013 National Census of Domestic Violence Services. This detailed survey found that in Texas, in

¹ United States Interagency Council on Homelessness. Issues; Domestic Violence. http://usich.gov/issue/domestic_violence (accessed 10/2/2014).

² Fact Sheet: Some Facts on Homelessness, Housing, and Violence Against Women. National Law Center on Homelessness and Poverty. Washington, D.C., 2006.

just one day, domestic violence programs served 5,923 victims. Shockingly, however, on that same day, 1,311 Texas survivors' requests for services went unmet and over 500 of those were for housing. The most frequently requested non-residential service that could not be provided was financial assistance, followed by legal representation, and housing advocacy.³

Building solutions for survivors of domestic violence and their families in Texas requires understanding the connections between homelessness and violence against women. In too many instances, victims of domestic violence suffer not only the physical violence but also the devastation of displacement from their homes. As a result, affordable housing issues become a serious consequence of domestic violence.⁴

TCFV Appreciates TICH's Inclusion of Domestic Violence

As a current advisory member of the Texas Interagency Council on Homelessness (TICH), TCFV applauds the recognition of these connections and the accompanying inclusion of domestic violence survivors throughout the Plan. In particular, TCFV notes the following items:

- Consultation with various Texas family violence programs and stakeholders, several of which established the unique and critical need for shelter for survivors of domestic violence, dating violence, and stalking as well as other extended housing options.
- Mention of domestic violence as a major category of the special needs population,
- Acknowledgement of the need for a broad range of housing options for survivors of domestic violence, who have varying family compositions,
- Acknowledgement of the importance of supportive services that enhance survivor safety and housing stability, and
- Recognition of the federal requirements of the 2013 Reauthorization of the Violence Against Women Act within the Plan

Opportunities for Augmenting the Plan

TCFV points to a few significant areas of the Plan that should elevate the co-occurrence of domestic violence and homelessness in a meaningful and practical manner.

For instance, although both the USICH and Texas Homeless Network's 2014 Balance of State (BoS) Point-In-Time (PIT) Count Report identify domestic violence as a major contributor to homelessness, the Plan in its current format does not. The 2014 BoS PIT states that domestic violence and homelessness are regrettably woven and that countless women today are "stably housed" in an abusive relationship, but leaving this relationship could very likely leave the woman and children in a homeless situation.⁵ The Plan currently insufficiently prioritizes

³ 2013 Domestic Violence Counts: A 24-Hour Census of Domestic Violence Shelters and Services. National Network to End Domestic Violence. <http://nnedv.org/projects/census/4225-domestic-violence-counts-census-2013-report.html> (accessed 10/2/2014).

⁴ *Id.*

⁵ 2014 Point-In-Time Count. Texas Homeless Network.

survivors of domestic violence and their children and excludes language related to how providers should comprehensively outline the specific response to this identified special needs population. The Plan does not reflect a sufficiently deep understanding of the problem of domestic violence in our communities, identify tangible solutions, or display the commitment necessary to providing housing options to survivors of domestic violence and their children.

In order to help shore up these deficiencies within the Plan, TCFV recommends the following revisions for the Plan to thoroughly address and include the following points:

1. Greater prioritization for domestic violence including establishing a stand-alone category within the plan specifically addressing Texas' housing solutions for domestic violence survivors. As one of the largest populations within the homeless community, this is critical.
2. Formal recognition of domestic violence as one of the main factors of homelessness or being at-risk for homelessness.
3. Amend references indicating that Single Room Occupancy (SRO) housing, which is not the best practice approach when working with survivors, would meet the needs of all special populations as is indicated in this document.
4. Continue to emphasize the importance of, and encourage all Public Housing Authorities (PHAs) to consider, adopting admission preferences for victims of domestic violence.⁶
5. Create outcomes that match the needs of family violence survivors and recognize the unique barriers they face. Although we recognize and applaud the Housing First model, TCFV recommends maintaining the allowance for family violence programs to utilize ESG funds to support emergency shelters and transitional housing because for family violence services specifically these efforts have produced highly successful outcomes throughout the years. Emergency family violence shelters and transitional housing programs must exist to allow victims and survivors to flee abusive relationships and have appropriate and available domestic violence specific housing options and supportive services. The troubling trend of limiting these long successful funding opportunities for family violence programs represents one of the most significant areas of the Plan in need of augmentation and greater attention.
6. Consider alternate solutions for coordinated access, data collection, and housing waiting lists, specifically in regards to HMIS, for organizations that serve survivors of domestic violence in order to comply with the federal legislation confidentiality requirements of the 2013 Reauthorization of the Violence Against Women Act (VAWA).
7. Assuring that VAWA requirements are followed as well as having an alternate way for survivors and victims to gain access to the same types of services without being put into an identifiable centralized system.

Also, on Page 9 of the Plan, as a matter of relatively minor change, please augment TCFV's name to read Texas Council on Family Violence, rather than Texas Coalition on Family Violence.

Domestic violence too often causes homelessness and housing instability. In some studies, homeless women have reported that abuse by an intimate represented one of the primary reasons

⁶ Public Housing Occupancy Guidebook, Part 7 – Chapter 19, Domestic Violence: Page 216.

they left their prior housing and found themselves with no alternative to homelessness.⁷ **Texas must continue to create opportunities and access for survivors of domestic violence to safe and affordable housing options, because we know that housing and economic stability leads to increased safety for survivors and their children.**

TCFV, along with the 12 Texas family violence member programs listed below, thank you for your time and consideration and we look forward to working together with TDHCA and stakeholders to end homelessness in Texas.

Gloria Terry
Chief Executive Officer
Texas Council on Family Violence
Austin, Texas

Debbie Moseley
Executive Director
The Bridge Over Troubled Waters
Pasadena, Texas

Paige Flink
Executive Director
The Family Place
Dallas, Texas

William Hall
Director of Operations
Families in Crisis, Inc.
Killeen, Texas

Rebecca L. White
President and CEO
Houston Area Women's Center
Houston, Texas

Sherry Taylor
Executive Director
Women's Protective Services
Lubbock, Texas

Frances Wilson
President and Chief Executive Officer
Women's Shelter of South Texas
Corpus Christi, Texas

Carol Gresham
Executive Director
Shelter Agencies for Families in East Texas
(SAFE-T)
Mt. Pleasant, Texas

Connie Sloan
Executive Director
Domestic Violence Prevention, Inc.
Texarkana, Texas

Marta Pelaez
President and Chief Executive Officer
Family Violence Prevention Services, Inc.
San Antonio, Texas

Toni Johnson-Simpson
Executive Director
Denton County Friends of the Family
Denton, Texas

Mary Lee Hafley
President and Chief Executive Officer
SafeHaven of Tarrant County
Hurst, Texas

Julia Spann
Executive Director
SafePlace
Austin, Texas

⁷ Davies, Jill, and Eleanor Lyon. Domestic Violence Advocacy: Complex Lives/Difficult Choices. Second ed. N.p.: SAGE Publications, 2014. 43. Print.

Sent: Thursday, October 02, 2014 10:09 PM

To: info@tdhca.state.tx.us

Subject: Please continue the Homebuyer Assistance Program

Dear TDHCA,

I am writing to voice my support of the Texas Homebuyer Assistance Program funded through the HOME program. It has come to my attention that TDHCA plans to eliminate the HBA program from its 2015-2019 Consolidated Plan. This program has been of tremendous help to thousands of Texans over the life of the program. It is the most effective program in creating lasting equity and assets for low-income Texans moving them from being a renter to being a homeowner that pays property taxes. Please reinstate the program as part of the State's 2015-2019 Consolidated Plan.

I have seen this program improve the lives of many Texans. It helps makes families stronger and communities more stable. This is a simple way for the state to invest in the lives of its citizens.

Thanks for your attention,
Jesse Miller

Sent: Friday, October 03, 2014 12:08 PM

To: info@tdhca.state.tx.us

Subject:

Dear TDHCA,

I am writing to voice my support of the Texas Homebuyer Assistance Program funded through the HOME program. It has come to my attention that TDHCA plans to eliminate the HBA program from its 2015-2019 Consolidated Plan. This program has been of tremendous help to thousands of Texans over the life of the program. It is the most effective program in creating lasting equity and assets for low-income Texans moving them from being a renter to being a homeowner that pays property taxes. Please reinstate the program as part of the States 2015-2019 Consolidated Plan

Thank you,

Maria I Olivarez

Community Loan Center

Sent: Thursday, October 02, 2014 7:03 PM
To: info@tdhca.state.tx.us
Subject: Texas Homebuyer Assistance Program

Dear TDHCA,

I am writing to voice my support of the Texas Homebuyer Assistance Program funded through the HOME program. It has come to my attention that TDHCA plans to eliminate the HBA program from its 2015-2019 Consolidated Plan. This program has been of tremendous help to thousands of Texans over the life of the program. It is the most effective program in creating lasting equity and assets for low-income Texans moving them from being a renter to being a homeowner that pays property taxes. Please reinstate the program as part of the States 2015-2019 Consolidated Plan.

Larry Hollmann

Sent: Friday, October 03, 2014 9:41 AM
To: info@tdhca.state.tx.us
Subject: Texas Homebuyer Assistance Program

Dear TDHCA,

I am writing to voice my support of the Texas Homebuyer Assistance Program funded through the HOME program. It has come to my attention that TDHCA plans to eliminate the HBA program from its 2015-2019 Consolidated Plan. This program has been of tremendous help to thousands of Texans over the life of the program. It is the most effective program in creating lasting equity and assets for low-income Texans moving them from being a renter to being a homeowner that pays property taxes. Please reinstate the program as part of the States 2015-2019 Consolidated Plan.

Nadia Erosa

Loan Servicing Accountant

Community Development Corp of Brownsville

Rio Grande Valley Multibank

Community Loan Center

Sent: Friday, October 03, 2014 9:40 AM

To: info@tdhca.state.tx.us

Subject:

Dear TDHCA,

I am writing to voice my support of the Texas Homebuyer Assistance Program funded through the HOME program. It has come to my attention that TDHCA plans to eliminate the HBA program from its 2015-2019 Consolidated Plan. This program has been of tremendous help to thousands of Texans over the life of the program. It is the most effective program in creating lasting equity and assets for low-income Texans moving them from being a renter to being a homeowner that pays property taxes. Please reinstate the program as part of the States 2015-2019 Consolidated Plan.

Sincerely yours

Sofia Reyes.

--

Sent: Friday, October 03, 2014 4:28 AM

To: info@tdhca.state.tx.us

Subject: Reinstate hba down payment assistance

Dear TDHCA,

I am writing to voice my support of the Texas Homebuyer Assistance Program funded through the HOME program. It has come to my attention that TDHCA plans to eliminate the HBA program from its 2015-2019 Consolidated Plan. This program has been of tremendous help to thousands of Texans over the life of the program. This program helps a family realize something they thought would never come true, It is the most effective program in creating lasting equity and assets for low-income Texans moving them from being a renter to being a homeowner that pays property taxes. Please reinstate the program as part of the States 2015-2019 Consolidated Plan.

Sent from my iPhone

Sent: Friday, October 03, 2014 9:05 AM
To: info@tdhca.state.tx.us
Subject: Texas Homebuyer Assistance Program

Dear TDHCA:

It is my understanding that the TDHCA is proposing to eliminate the Texas Homebuyer Assistance Program in the 2019 Consolidation Plan. I am strongly oppose of this action.

The THBA program has been of tremendous help to thousands of Texans over the life of the program. It is the most effective program in creating lasting equity and assets for low-income Texans moving them from being a renter to being a homeowner that pays property taxes.

Please reinstate the program as part of the States 2015-2019 Consolidated Plan.

Alex Coronado

Owner/Realtor

Alto Vista Realty, LLC

Brownsville, Tx. 78523

2012 WCR Entrepreneur of the Year

2011 BSPBOR Realtor of the Year

Member – TAR Property Management Committee

Member – TAR Professional Standards Committee

Sent: Friday, October 03, 2014 9:38 AM
To: info@tdhca.state.tx.us
Subject: Homebuyer Assistance Program

I am writing to voice my support of the Texas Homebuyer Assistance Program funded through the HOME program. It has come to my attention that TDHCA plans to eliminate the HBA program from its 2015-2019 Consolidated Plan. This program has been of tremendous help to thousands of Texans over the life of the program. It is the most effective program in creating lasting equity and assets for low-income Texans moving them from being a renter to being a homeowner that pays property taxes. Please reinstate the program as part of Texas' 2015-2019 Consolidated Plan.

Vaughn Cox

La Union del Pueblo Entero

San Juan TX 78589

Sent: Friday, October 03, 2014 12:08 PM

To: info@tdhca.state.tx.us

Subject:

Dear TDHCA,

I am writing to voice my support of the Texas Homebuyer Assistance Program funded through the HOME program. It has come to my attention that TDHCA plans to eliminate the HBA program from its 2015-2019 Consolidated Plan. This program has been of tremendous help to thousands of Texans over the life of the program. It is the most effective program in creating lasting equity and assets for low-income Texans moving them from being a renter to being a homeowner that pays property taxes. Please reinstate the program as part of the States 2015-2019 Consolidated Plan

Thank you,

Maria I Olivarez

Community Loan Center

Brownsville, TX

To: info@tdhca.state.tx.us

Subject: support Texas Homebuyer Assistance Program

Dear TDHCA,

I am writing to voice my support of the Texas Homebuyer Assistance Program funded through the HOME program. It has come to my attention that TDHCA plans to eliminate the HBA program from its 2015-2019 Consolidated Plan. This program has been of tremendous help to thousands of Texans over the life of the program. It is the most effective program in creating lasting equity and assets for low-income Texans moving them from being a renter to being a homeowner that pays property taxes. Please reinstate the program as part of the States 2015-2019 Consolidated Plan.

Thanks,

Christina Herrera

Grant Reimbursement Clerk

Community Development Corporation of Brownsville

Sent: Monday, October 06, 2014 8:28 AM
To: info@tdhca.state.tx.us
Subject: Support Email

Dear TDHCA,

I am writing to voice my support of the Texas Homebuyer Assistance Program funded through the HOME program. It has come to my attention that TDHCA plans to eliminate the HBA program from its 2015-2019 Consolidated Plan. This program has been of tremendous help to thousands of Texans over the life of the program. It is the most effective program in creating lasting equity and assets for low-income Texans moving them from being a renter to being a homeowner that pays property taxes. Please reinstate the program as part of the States 2015-2019 Consolidated Plan.

Reynaldo D. Vasquez

U.S. Small Business Administration

Economic Development Specialist / Veterans Representative

Lower Rio Grande Valley District Office

Harlingen, TX 78550

Sent: Monday, October 06, 2014 3:34 PM
To: info@tdhca.state.tx.us
Subject: Homebuyer Assistance Program

Dear TDHCA,

I am writing to voice my support of the Texas Homebuyer Assistance Program funded through the HOME program. It has come to my attention that TDHCA plans to eliminate the HBA program from its 2015-2019 Consolidated Plan. This program has been of tremendous help to thousands of Texans over the life of the program. It is the most effective program in creating lasting equity and assets for low-income Texans moving them from being a renter to being a homeowner that pays property taxes. Please reinstate the program as part of the States 2015-2019 Consolidated Plan.

GINA GONZALEZ

Mortgage Underwriter

Community Development Corporation of Brownsville

BROWNSVILLE, TX 78520

Sent: Tuesday, October 07, 2014 9:10 AM
To: info@tdhca.state.tx.us
Subject: Texas Homebuyer Assistance Program
Importance: High

To Whom It May Concern:

I am writing to voice my support of the Texas Homebuyer Assistance Program funded through the HOME program. It has come to my attention that TDHCA plans to eliminate the HBA program from its 2015-2019 Consolidated Plan. This program has been of tremendous help to thousands of Texans over the life of the program. It is the most effective program in creating lasting equity and assets for low-income Texans moving them from being a renter to being a homeowner that pays property taxes. Please reinstate the program as part of the States 2015-2019 Consolidated Plan.

Traci Wickett

President & CEO

United Way of Southern Cameron County

Brownsville TX 78520

Sent: Monday, October 06, 2014 9:00 AM
To: 'info@tdhca.state.tx.us'
Subject: Letter of Support

Dear TDHCA,

I am writing to voice my support of the Texas Homebuyer Assistance Program funded through the HOME program. It has come to my attention that TDHCA plans to eliminate the HBA program from its 2015-2019 Consolidated Plan. This program has been of tremendous help to thousands of Texans over the life of the program. It is the most effective program in creating lasting equity and assets for low-income Texans moving them from being a renter to being a homeowner that pays property taxes. Please reinstate the program as part of the States 2015-2019 Consolidated Plan.

If it were not for this program, my family and I would still be leasing a home and paying someone else's mortgage. They gave us the education, tools and foresight to reach our goal of home ownership. We are truly grateful.

Please continue to fund and support this program---as it exemplifies the American dream.

Cynthia A. Gilcrease, L.N.F.A.

Vice President of Operations

Regency Post Acute Healthcare System

Weslaco, Texas 78596

Sent: Monday, October 06, 2014 3:27 PM
To: info@tdhca.state.tx.us
Subject: Supporting Texas Homebuyer Assistance Program

Dear TDHCA,

I am writing to voice my support of the Texas Homebuyer Assistance Program funded through the HOME program. As a staff member of Community Development Corporation of Brownsville, I've witnessed life-changing, momentous occasions where low-income families become homeowners through this assistance.

It has come to my attention that TDHCA plans to eliminate the HBA program from its 2015-2019 Consolidated Plan. This program has been of tremendous help to thousands of Texans over the life of the program. It is the most effective program in creating lasting equity and assets for low-income Texans moving them from being a renter to being a homeowner that pays property taxes.

Please reinstate the program as part of the States 2015-2019 Consolidated Plan.

Thank you for your consideration,

Luciana Morales, MPPM

Project Coordinator

Community Development Corporation of Brownsville

Sent: Tuesday, October 07, 2014 9:11 AM

To: info@tdhca.state.tx.us

Subject: Help us Keep Homeownership Dreams Alive!!!

Dear TDHCA,

As the Public Relations Specialist for Community Development Corporation of Brownsville, I have seen, first-hand, how homeownership greatly benefits our families. I am writing to voice my support of the Texas Homebuyer Assistance Program funded through the HOME program. Housing is NOT a sector in the community that should be viewed as its own category. Housing is deeply integrated with all the other components that create a successful community including health, income, and education. It has come to my attention that TDHCA plans to eliminate the HBA program from its 2015-2019 Consolidated Plan. This program has been of tremendous help to thousands of Texans over the life of the program. It is the most effective program in creating lasting equity and assets for low-income Texans moving them from being a renter to being a homeowner that pays property taxes. Please reinstate the program as part of the States 2015-2019 Consolidated Plan.

Thank you for your consideration,

Cynthia Rocha

Public Relations Specialist

Community Development Corporation of Brownsville

Sent: Friday, October 03, 2014 10:21 AM

To: info@tdhca.state.tx.us

Subject: HOME Program

Please record the support of the Harrison County Housing Finance Corporation and the East Texas Housing Finance Corporation for the continuation of the HOME Program. Over the years we have utilized this program to enable low and moderate income families purchase their first home, when they could not afforded one otherwise.

From my service as Senator, District One, I was able to witness first hand that Texas unfortunately few programs to assist the less fortunate. The lack of continuation of the HOME Program would only exacerbate this problem. This program helps the less fortunate to help themselves, and should be continued. Thanks for your attention and courtesies in these respects.

Judge Richard Anderson
Marshall, Texas 75670

Sent: Friday, October 03, 2014 10:41 AM

To: info@tdhca.state.tx.us

Subject: TDHCA's HOME Program

Greetings:

I have learned that the TDHCA has stricken the HOME program from its Consolidated Plan for 2015-2019. In today's time of dwindling resources it is difficult to understand why anyone would reject money. In the Rio Grande Valley, and in Texas, there continues to be a tremendous need for precious limited resources to realize the "American Dream" of many families of owning a home. Please DO NOT eliminate the possibility of homeownership for families. At one of our entities, El Rosario Homes in Mission, we have conducted a needs survey of every household (99). To our surprise, the number one need expressed by families is the dream of owning their home. We would like to give these families some good news by telling them that local, state, and federal programs are available and at their reach to make homeownership very possible. We will be conducting a needs survey at our facility in Mercedes, La Merced Homes; we expect that homeownership will be at the top of list as well. In behalf of families like those at our facilities, El Rosario Homes and La Merced Homes asks that the TDHCA re-implement the Home Buyer Assistance program into its Consolidated Plan 2015-2019. Thanks for your consideration.

Roberto Medrano, Director of Housing Ministry, Diocese of Brownsville

Sent: Friday, October 03, 2014 9:37 AM
To: info@tdhca.state.tx.us
Subject: 2015-2019 Consolidated Plan

Dear TDHCA,

I have been reviewing the TDHCA consolidated plan for 2015-2019. In the plan TDHCA has eliminated the Down payment Assistance Program stating that there are other sources of funds and there is no demand. This could not be further from the truth in the RGV. Over the past 3 years CDCB has accessed over \$831,100 which leveraged another \$4.6 million serving 57 families in Cameron County. This is only an average amount of \$14,595 per client in assistance. The average client earned 52% of the AMFI or just \$18,720. This is the best anti-poverty program in TDHCA's arsenal of programs. CDCB utilized the funds for new construction assistance which created an additional tax revenue for Cameron County taxing entities' of \$115,000 per year. It is also estimated that this program alone created or sustained an average of .75 jobs per house or 43 jobs over the last three years. TDHCA's argument that there are other funds available from other sources to use for is ludicrous, believe me if there was another source I would know about it. In our region there are no funds for down payment assistance in the rural areas. People living in the 120 colonias in Cameron County now have no access to Down Payment assistance, nor does anyone else in non-PJ areas.

I ask that TDHCA reinstate the Home Buyer Assistance Program in the 2015-2019 Consolidated Plan.

Thank you,

Nick Mitchell-Bennett

Brownsville, Texas 78520

Sent: Friday, October 03, 2014 8:42 AM
To: info@tdhca.state.tx.us
Subject: Homebuyer Assistance Program

We have been fortunate to be able to close on many transaction wherein TDHCA has assisted families along with Community Development Corp of Brownsville in acquiring their home.

The joy in their faces has been very rewarding to me as a closing agent because they walk out of our office just so happy knowing that they will now be Home Owners.

Without the assistance from TDHCA their dream would not be possible.

I truly hope that TDHCA will reconsider their decision of cancelling the program as many families depend on the assistance provided by TDHCA.

Not only do the families benefit, but the closing of the transactions provides work for the surveyor, the insurance company and us the Title Company, appraisers and the wonderful crew at

CDCB that makes it possible for families that otherwise would not be able to acquire their home.

Please, reconsider the decision to stop the TDHCA Homeowner Assistance Program(s) and let's keep dreams coming true for many more families in our area.

Sincerely,

Alicia Hernandez

Escrow Officer/ Branch Manager

Rio Grande Valley Abstract Co., Inc.

Brownsville, Texas 78520

Sent: Monday, October 06, 2014 8:44 AM
To: info@tdhca.state.tx.us
Subject: Home Buyer Assistance Program

I am the Executive Director of the Paris/Lamar County Habitat for Humanity affiliate in Paris, Texas. I am writing to voice my support of the Texas Homebuyer Assistance Program funded through the HOME program. It has come to my attention that TDHCA plans to eliminate the HBA program from its 2015-2019 Consolidated Plan. This program has been of tremendous help to thousands of Texans over the life of the program. It is the most effective program in creating lasting equity and assets for low-income Texans moving them from being a renter to being a homeowner that pays property taxes. In our particular case, it has been INVALUABLE to our small affiliate. Not only does it help the homeowner by reducing the principal balance of their home, making it even more affordable for them, it also helps us by putting money into our bank account with which we can build MORE homes. Money in a small town gets very hard to come by. We currently have 5 prospective homeowners on our list who are waiting to get homes and it would help them greatly. It has allowed us to increase our volume of building from one home per year to two and working toward even more.

Please reinstate the program as part of the States 2015-2019 Consolidated Plan.

Thank you. Judy Martin

Sent: Thursday, October 09, 2014 4:18 PM
To: info@tdhca.state.tx.us
Subject: Consolidated Plan Comments

Elizabeth,

I want to make comments about the consolidated plan

We support continuing having HOME funds available for Homebuyer Assistance(HBA)

.
In fact the argument can be made that HBA and Homeowner Rehabilitation Assistance (HRA) provide the most long term assistance out of all the HOME activities, as opposed to Tenet Based Rental Assistance (TBRA), which is a temporary 2 year assistance program.

HRA allows permanent residents to remain in homes they own and HBA allows people to make permanent roots in a community.

Respectfully,
Donna M Johnson
Director of Housing Programs
GrantWorks, Inc.
Beeville, Texas 78104
www.grantworks.net

Sent: Thursday, October 02, 2014 2:15 PM
To: info@tdhca.state.tx.us
Subject: Consolidated Plan Comments

Please see the comments below from Disability Rights Texas regarding the proposed Consolidated Plan currently out for public comment:

On Page 36 of the Needs Assessment Table 18 and page 21 of the Market Analysis Table 12, it would be important to include the breakout of the Project Access vouchers which would fit into the 'Special Purpose Voucher - Disabled' category

On Page 37 of the Needs Assessment Table 19 - 833 have requested accessibility features? It appears the report is noting that every voucher holder has requested accessibility features - even if all the vouchers are for individuals with disabilities it has not been our experience that all request accessibility features but perhaps we may not be understanding the terminology of this report.

On Page 39 of the Needs Assessment - would it not be appropriate to include the Project Access wait list information - important to include the incredible need demonstrated by the growing wait list. Based on the response to the question it would appear that no applications are submitted to TDHCA for the Project Access vouchers but it is our understanding that to be put on the wait list one must complete an application.

On Page 26 of the Market Analysis Table 14 that refers to HOPWA Assistance a 'P' is needed in the column currently listed as 'Type of HOWA Assistance'

For the proposed strategic plan we would recommend that the department propose a set-aside of HOME Tenant Based Rental Assistance (TBRA) under the Persons with Disabilities allocation be created to assure a quick solution to those confined to institutions waiting to move to the community on the Project Access wait list.

Jean M Langendorf
Policy Analyst

On Oct 3, 2014, at 6:25 PM, Joy Horak-Brown wrote:

Dear Tim,

I just learned through my friend, Nick Mitchell-Bennett in Brownsville, that the Department intends to eliminate the Texas Homebuyer Assistance Program. As you know, New Hope does not, at this time, build single family homes; however, through the years many have encouraged us to do so. Of course, I've assumed that the TDHCA program would be very helpful in that regard.

I join Nick in supporting programs that create lasting equity for low-income citizens and hope the Department can reconsider including this program in the consolidated plan.

This brings with it my appreciation for all that you do.

Warm regards,

Joy
Joy Horak-Brown
Executive Director
New Hope Housing, Inc.
Houston Area CDC
Houston, Texas 77002
www.newhopehousing.com

Sent: Friday, October 10, 2014 5:20 PM
To: info@tdhca.state.tx.us
Subject: Consolidated Plan Comments

Elizabeth:

I want to make some comments regarding the consolidated plan.

COMMENT 1: I request and support continuing HOME funding for the Homebuyer Assistance Program (HBA). HBA provides long term benefits to the low income homebuyers as well as to the communities in which they live. It is the only program that enables participants to move from a status of poverty to a position of no or little continued reliance on public welfare. In order to qualify for the program, participants have to obtain a mortgage loan from the private sector marketplace. They have to resolve credit issues and increase their credit scores before they can purchase a home. Additionally, since the late 1960's studies have been undertaken in an attempt to quantify the benefits of homeownership. Some of the things these studies have found comparing homeowners to renters are: children of homeowners typically do better in school and their highschool graduation rate is higher, homeowners are more involved in school and local government issues, there are fewer incidences of teenage pregnancy and gang involvement for children of homeowners and children of homeowners tend to become homeowners themselves when they reach adulthood.

On the financial side, HBA provides the greatest percentage of leverage of the three major HOME funded single family programs (HBA, HRA, TBRA). Because the HBA program is tied to private sector mortgage financing, even in the poorest, most rural areas each dollar of downpayment assistance results in at least \$3 in mortgage financing; in the more affluent areas, that ratio increases exponentially. In one city for example for every \$1 spent in HBA funds an additional \$14 in private sector money was spent. Over the past three years, the majority of homes financed utilizing HBA funds have been either new construction or newly constructed houses. What that has meant is that utilization of the HBA Program has resulted in increases in the local tax base. In one city, for example, 12 HBA loans were closed which resulted in an increase in the local tax base by over \$1 million.

The argument for not funding the HBA program according to the report is that demand is low. This is a specious argument at best. According to TDHCA demand is determined by the number of reservations made in the state system. The problem is that under the reservation system as it is current devised. HBA cannot compete on an equal basis with TBRA or HRA. The programs operate differently. Throughout the last four months, we have received a minimum of one call per week from interested applicants wanting to participate in the HBA program. None of those requests for assistance are reflected in the State reservation system--it doesn't allow it. TDHCA HOME staff has been working on this issue and in the December funds rollout has provided a set aside for HBA. Hopefully this will be a small step in correcting this problem.

COMMENT 2: I support continued HOME funding for the HRA Program. this program also has a long term benefit for the participants. It takes dilapidated homes in communities and replaces them with stick built houses. the participants receive an extraordinarily improved home to live in and neighborhood blight has been eliminated. Also, just as in the HBA program, putting a new house in an existing neighborhood has a domino effect on the homes around them. Neighbors begin improving and maintaining their homes better. Although the local property tax advantage is not as great as in HBA, it is still there and the useful life of the property has been greatly extended.

Both the HBA and HRA programs provide for long term benefits to the applicants and the communities in which they live. TBRA does not.

COMMENT 3: I do not support continued HOME funding for the TBRA Program. In fact, I believe the entire TBRA Program should be eliminated and if not eliminated, at the minimum, severely curtailed. The program does not provide any long term benefit to the population it is purported to serve. The program can only provide two years of rental assistance to each tenant on the program. At the end of that time the administrator is supposed to have operated a self-sufficiency program that would result in the tenant being in such an improved position so as to no longer need to be on the public dole. Over the years, TDHCA has allowed the original meaning and purpose of self-sufficiency to be perverted to mean that the program should get the people on TBRA onto a permanent local Section 8 Voucher program (which is also funded by HUD). This is not self-sufficiency. And since most local housing authorities have waiting lists that are as long as five years, what happens to the TBRA participants when their assistance runs out? Do they pay an exorbitant amount of their income for rent? Are they evicted? No one seems to know. One thing is certain. The landlords participating in the program are not going to let them stay in their units at the same rate of payment the tenants made when they were receiving the TBRA assistance.

The only true long term beneficiary of the TBRA Program are the participating landlords.

I recommend that funding for the TBRA Program be eliminated and that that funding be redirected to HBA and the Single Family Development Program. Both of which will provide long term benefits both to the participants and the communities in which they live.

Thank you for the opportunity to comment.

Michael Hunter
Hunter & Hunter Consultants, Inc.

Sent: Monday, October 13, 2014 11:51 AM
To: info@tdhca.state.tx.us
Subject: Homebuyer Assistance Program

To whom it may concern:

I am writing to make comments on the consolidated plan.

I fully support continued HOME funding of the Homebuyer Assistance Program. In Waxahachie, we have assisted twelve clients purchase a home, essentially within a two year time period. The majority of the homes were newly constructed. In every case, if we had not been able to utilize HBA program funding, it is unlikely that the homebuyers would have been able to complete their home purchases. The benefit to the applicant is obvious and long term. However, it should also be noted that the Program allowed a benefit to the local taxing entities as well. Because the majority of these houses were newly constructed (spec homes) the construction and sale of those properties has had a positive effect on the local tax base. As a result of this program, our local tax base has increased by approximately \$1 million. Also, because we waived the water/waste water impact fees on newly constructed houses associated with the HBA Program, we were able to create almost \$21,000 in match for the State to use. This program has been great for Waxahachie homebuyers and TDHCA,

In short, this is an excellent program and I urge you to continue its funding.

Thank you for taking my comment.

Sincerely,

Paul Stevens

City Manager

Paul Stevens

City Manager

City of Waxahachie

Waxahachie, TX | 75168

Sent: Monday, October 13, 2014 11:11 AM
To: info@tdhca.state.tx.us
Subject: Homebuyer Assistance Program

To whom it may concern,

I am communicating to advocate for the veterans of Cameron County and veterans in general. The Texas homebuyer Assistance Program gives some of veterans the most practical option of home ownership. I pledge my support for the reinstatement of the aforementioned program as part of the State's 2015-2019 Consolidated Plan.

Thank you.

Regards,
Ren Valdez

RENÉ VALDEZ
Program Director
Veterans Upward Bound,
Brownsville, Texas 78520

Sent: Monday, October 13, 2014 3:11 PM
To: 'info@tdhca.state.tx.us'
Subject:

To whom it may concern:

I am writing to make comments on the consolidated plan.

I urge TDHCA to continue HOME funding of the Homebuyer Assistance Program (HBA). Rockwall Housing Development Corporation (RHDC) is administering a reservation agreement which includes

HBA. We have advertised the program and have received approximately 20 inquiries from potential applicants.

We understand that the reservation system, the way TDHCA is operating makes it very difficult for us to reserve funds for this program.

We again understand that TDHCA is working on this problem and is considering establishing a set aside for HBA

This should solve the issue with getting our cases reserved.

This is an excellent program and interest is high.

Please continue HOME funding for the HBA Program.

Thank you for considering my opinion.

Donna Allen
President
Rockwall Housing Development Corporation

Donna Allen, APS

City of Rockwall

Finance

Rockwall, Tx 75087

TEXAS DEPARTMENT OF HOUSING AND COMMUNITY AFFAIRS

DRAFT STATE OF TEXAS
2015-2019 CONSOLIDATED PLAN

PUBLIC HEARING

Grand Ballroom C
Omni San Antonio Hotel
9821 Colonnade Boulevard
San Antonio, Texas

6:00 p.m
Tuesday,
September 30, 2014

PRESIDING: NAOMI TREJO
TDHCA Housing Resource Center

ON THE RECORD REPORTING
(512) 450-0342

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11

I N D E X

SPEAKER

PAGE

Introduction

3

Public Comment:

Mary Dodson

8

Eric Samuels

9

Renee Hopper

12

P R O C E E D I N G S

1
2 MS. TREJO: Let's get started. Good evening.
3 Today is Tuesday, September 30, 2014, and the time is
4 6:17 p.m.

5 My name is Naomi Trejo, and I'm with the Texas
6 Department of Housing and Community Affairs. Welcome to
7 this public hearing in San Antonio on the Draft 2015-2019
8 State of Texas Consolidated Plan, known as the Plan.

9 This hearing is an opportunity to obtain the
10 views of citizens on this plan. For anyone interested in
11 speaking, we need you to fill out a witness affirmation
12 form, located in the back. If you haven't already
13 completed one, Cate is standing by them right in the back
14 there.

15 Also, as you speak, please provide your name
16 and who you represent. And as a reminder, we are here to
17 accept public comment and will not able to respond to any
18 questions.

19 If you would like to submit written comment at
20 a later time, please taken an information sheet, located
21 by the water, with written submission details.

22 Please note that all comments must be received
23 no later than 6:00 p.m., Central time, on Monday, October
24 13, 2014.

1 I'm going to give some background on the plan:
2 The Texas Department of Housing and Community Affairs, or
3 TDHCA, coordinates the preparation of the plan with the
4 Texas Department of Agriculture and the Department of
5 State Health Services.

6 The plan will be submitted to the U.S.
7 Department of Housing and Urban Development, known as
8 HUD.

9 The plan covers the State's administration of four
10 programs: the Community Development Block Grant program,
11 administered by the Texas Department of Agriculture; the
12 Housing Opportunities for Persons with AIDS program,
13 administered by the Department of State Health Services;
14 and the Emergency Solutions Grants program; and the Home
15 Investment Partnerships Program, administered by TDHCA.

16 We'll start with the Community Development
17 Block Grant program, also known as the CDBG program.
18 Under the CDBG program, assistance is available to non-
19 entitlement general purpose units of local government,
20 including cities and counties that are not
21 participating -- or designated as eligible to participate
22 in the entitlement portion of the federal CDBG program.

23 Is there anyone here to comment on the CDBG
24 program?

1 MS. DODSON: I have comments on kind of the
2 whole thing.

3 MS. TREJO: We will take comments on the whole
4 thing at the end, unless you want to come forward now.

5 Okay? So anyone else to comment on the CDBG
6 program?

7 (No response.)

8 MS. TREJO: All right. Hearing none, we'll
9 move on to the HOME program. The Home Investment
10 Partnerships Program, known as HOME, funds various
11 entities for the purpose of providing safe, decent, and
12 affordable housing across the state of Texas.

13 To provide this kind of support communities,
14 HUD awards an annual allocation of approximately
15 \$24 million to TDHCA. Under the HOME program, TDHCA
16 contracts with applicants for the administration of
17 Homebuyer Assistance Program, including a contract for
18 deed set-aside to assist in the conversion of contract-
19 for-deed arrangements into a warranty deed; home owner
20 rehabilitation program, tenant-based rental assistance
21 programs, and rental housing development programs.

22 In accordance with the HOME final rule, 15
23 percent of the total HOME allocation is set aside for
24 activities conducted by community housing development

1 organizations, also known as CHDOs.

2 Is there anyone here to comment on the HOME
3 program?

4 (No response.)

5 MS. TREJO: All right. Hearing none, we'll
6 move on to the Emergency Solutions Grants program, known
7 as ESG.

8 The ESG program is a competitive grant that
9 awards funds to private nonprofit organizations, cities,
10 and counties in the state of Texas to provide the
11 services necessary to help persons that are at risk of
12 homelessness or homeless quickly regain stability and
13 permanent housing.

14 The ESG program provides funding to engage
15 homeless individuals and families living on the street,
16 improve the number and quality of emergency shelters for
17 homeless individuals and families, help operate these
18 shelters, provide essential services to shelter
19 residents, rapidly rehouse homeless individuals and
20 families, and prevent families and individuals from
21 becoming homeless.

22 Is there anyone here to comment on the ESG
23 program?

24 VOICE: We have a comment on all of them. Can

1 we do that at the end?

2 MS. TREJO: You can do that at the end, or you
3 can come forward now. That's fine.

4 All right. Are there any other comments on the
5 ESG program only?

6 (No response.)

7 MS. TREJO: Okay. We'll move on. We're going
8 to -- second from the end, the Housing Opportunities for
9 Persons as AIDS, known as the HOPWA program: The Texas
10 Department of State Health Services administers the HOPWA
11 program, which addresses the housing needs of people with
12 AIDS and HIV.

13 It provides short-term rent, mortgage, and
14 utility payments to prevent homelessness; tenant-based
15 rental assistance, which enables low-income individuals
16 to pay rent and utilities until there is no longer a need
17 or until they are able to secure other housing;
18 supportive services, which provides case management,
19 basic telephone assistance, and smoke detectors; and
20 permanent housing placement, which allows assistance for
21 reasonable security deposits, related housing application
22 fees, and credit checks.

23 Is there anyone here to comment on the HOPWA
24 program?

1 (No response.)

2 MS. TREJO: All right. Moving on, are there
3 any further comments on the Draft State of Texas
4 Consolidated Plan?

5 I see I have a witness affirmation from Mary
6 Dodson. Would you come forward. And would you please
7 state your name and who you're with, for the record.

8 MS. DODSON: I'm Mary Dodson, with Texas
9 Homeless Network. We appreciate the opportunity to
10 comment on the 2015 through '19 State of Texas
11 Consolidated Plan.

12 We have five comments, I think. The first one
13 is housing ends homelessness, and the we support the
14 plan's goals of using ESG for homelessness prevention,
15 shelter, and rapid rehousing; using HOME TBRA for rapid
16 rehousing; constructing and rehabilitating units of
17 multifamily affordable housing; using HOPWA TBRA for
18 rapid rehousing and homelessness prevention; using HOPWA
19 STRMU for homelessness prevention; using HOPWA permanent
20 housing placement assistance for homelessness prevention,
21 and using \$30 million in CDBG funds to create more
22 housing in colonias.

23 We ask that you also prioritize persons who are
24 in homeless situations for TBRA funds from HOME and

1 HOPWA, so prioritizing persons who are already in a
2 homeless situation for those funds; and prioritizing
3 families experiencing homelessness as tenants in
4 multifamily units.

5 Second, we appreciate consulting with TDHCA on
6 COC goals, the allocation of ESG funds, the development
7 of coordinated assessment systems, the establishment of
8 standards for service; and the evaluation of ESG-funded
9 projects.

10 Third, for HOME, CDBG, and HOPWA, we would like
11 you to prioritize projects that use evidence-based
12 practices and promising practices in housing, including
13 permanent supportive housing, rapid rehousing, and using
14 a housing-first approach.

15 Fourth, allow CDBG funds to be used for public
16 services and targeted towards programs that work to end
17 homelessness, including meeting match requirements and
18 funding supportive services.

19 And then I will submit in writing some more
20 information about permanent supportive housing and
21 housing first.

22 MS. TREJO: All right. Thank you very much.

23 MS. DODSON: Thank you.

24 MS. TREJO: And is there another commenter?

1 Please come forward.

2 Just state your name and who you're with, for
3 the record.

4 MR. SAMUELS: My name is Eric Samuels, and I'm
5 with Texas Homeless Network. I just want to reiterate a
6 lot of the things that Mary has said. I'm not going to
7 go through the list the way she did, but I do want to
8 thank TDHCA for consulting with the continuums of care on
9 the Emergency Solutions Grant project, and I hope we can
10 continue to do that and strengthen that collaboration. I
11 think we are headed that way, and we are very
12 appreciative of that.

13 We definitely would ask that TDHCA really look
14 towards these evidence-based practices and really try to
15 target some of the funding for those.

16 One of the areas that I think maybe we could
17 look at changing on the con plan is the allocation of ESG
18 funds. We did notice that in 2013, prior to that, the
19 budget was set up where there was more money for rapid
20 rehousing and a little bit less for prevention.

21 But then when you looked at the expenditures
22 and the expenditure percentages from that year, you
23 planned on, for 2014, to adjust those where prevention is
24 a little higher, rapid rehousing lower.

1 I would hope that we could work as a continuum
2 of care and as Texas Homeless Network with our
3 communities to better educate when prevention may be used
4 so we don't have to use some of our valuable Emergency
5 Solutions Grant funds and get those communities to use
6 rapid rehousing more often.

7 So if we could get that percentages back up a
8 little higher for rapid rehousing, I think that would
9 help, because that would fall along with what Mary said
10 and what I said earlier, about following the evidence-
11 based practices that were seen working across the nation.

12 We need housing -- there's a great need for
13 housing in all of our communities for families and
14 singles, and rapid rehousing is a good source of that.

15 We also would like to continue meeting with
16 TDHCA and providing information. And I noticed some of
17 the statistics that are in the con plan are in need of
18 updating, so we are able to help with that.

19 For example, the point-in-time count that is
20 listed in there is from 2013, and I am happy to report to
21 you that that number has gone down by 5 percent in 2014.
22 so now we're just over 28,000, which is still a huge
23 number, with 28,000 people experiencing homelessness.

24 So I think we want to update that if at all

1 possible, and we certainly would be welcome to working
2 with you on that.

3 But everything that Mary had mentioned earlier
4 we're definitely in support of, as a continuum of care
5 and as Texas Homeless Network.

6 Thank you.

7 MS. TREJO: Thank you for your comments.

8 And is there one more commenter? Renee Hopper,
9 is it?

10 MS. HOPPER: Hi. How do you do?

11 MS. TREJO: Good. How are you?

12 MS. HOPPER: And I have the pleasure of your
13 name, ma'am?

14 MS. TREJO: Naomi Trejo.

15 MS. HOPPER: Naomi.

16 Sir?

17 THE REPORTER: Joe Schafer.

18 MS. HOPPER: Thank you.

19 May I?

20 MS. TREJO: Yes. And please state your name
21 and who you're with.

22 MS. HOPPER. Yes, ma'am. My name is Renee
23 Hopper, and I'm not going to list the positions; I'm just
24 going to do this as an individual for all of us.

1 Recently -- you'll have to forgive me; I just
2 got here from Michigan; my mother's a veteran. And prior
3 to this we contacted your office, Ms. Loretta McCarty,
4 the compliance officer.

5 We were familiar with the board, their deadline
6 on housing in general. Between her and I, as she's a
7 retired school teacher, we covered 367 properties. We
8 covered all of the sectors of seniors, disabled,
9 veterans, your programs, programs that affected the
10 homeless on the highest level, tax credit property,
11 market value, all of the above, including veterans.

12 Unfortunately, Ms. McCarty, after 10 years in
13 her home as a retired teacher, had to leave her home at
14 the age of 62. We wrote a 167-page document that
15 unfortunately you did not receive. I have some of the
16 notes that I've covered.

17 Out of the all the properties, only one covered
18 all of them, in the Houston area; market value, veterans
19 under the VASH program; 30 percent, 50 percent, 60
20 percent; only one as an individual. Unfortunately, they
21 do not have transportation.

22 One of the finest properties that is very proud
23 of that property, but of all the other ones that we
24 called, from San Antonio to Galveston, Texas, in fact we

1 met in Houston with HUD. I also met with the directors
2 of USDA in Huntsville, Texas.

3 And unfortunately we even made a phone call to
4 some of the entities that provide services on the highest
5 level. I don't think there was one area that we didn't
6 use, besides our own funds and transportation, and I'm
7 going to take this time, because it's been 14 years since
8 I've testified in front of y'all, and thank you for being
9 here.

10 And I do thank you, from the State of Texas and
11 from the federal government, that you supply the grants
12 that are provided to the community and to the services.

13 But unfortunately, in your notes that I read on
14 the website, those whose social security benefits that do
15 not meet the federal requirements, because unfortunately
16 they do not make 2-1/2 to three times the amount of
17 money, and you're fully aware of that, or the SSI.

18 But we also have the other issues, those who
19 not make the credit scores; they have to have a 620; or
20 those who do not have the deposits to provide, or the pet
21 deposit. These are extremely serious, and if we're
22 supposed to prevent displacement in the future or
23 displacement now for most of us who are under the
24 criteria of the federal government as homeless as being

1 in cars or hotels or any of the above.

2 But I will say that all the wonderful entities,
3 especially Texas Homeless Network, and the rest of those
4 service providers try to do the best job they can, but
5 it's unfortunately we do not have -- let's put it this
6 way -- a little compassion.

7 I just covered half of this -- the Eastern
8 Seaboard, and I've never seen so many houses, businesses,
9 corporations that are empty. Out of 18 million pieces of
10 property, we all can work on providing our neighbors, our
11 families, and anyone else -- in fact, some of these
12 wonderful people like yourself, to prevent that from ever
13 happening.

14 But some things need to change, and I'm hoping
15 that you'll continue to provide those services for all of
16 the service providers but also to make those serious,
17 awful changes, because I provided the transportation, I
18 provided my own money, and I hit everything.

19 So I want to thank you for your time and want
20 to thank you for your service, and, yes, I have testified
21 many times at the capitol on all levels, but I will say
22 this, with all my heart, I am the first woman in the
23 state of Texas to start spousal maintenance. I never
24 received it.

1 I'm also the first to change state and federal
2 property law that did not benefit any of us women so our
3 names can be removed from the properties without any --
4 without out signature. Point taken by the Third Circuit
5 Court of Appeals and, recently as of last month, the
6 Federal Appeals out of New Orleans.

7 So I want you to take a really serious look at
8 what those laws just did. It's going to put more people
9 displaced, we're going to need more services.

10 So I thank you. My pleasure.

11 MS. TREJO: Thank you for your comments.

12 Are there any further comments on the Draft
13 2015-2019 State of Texas Consolidated Plan?

14 (No response.)

15 MS. TREJO: Since there are none, let me thank
16 you again for your taking your time to attend today's
17 hearing, and with that, this meeting is concluded.

18 (Whereupon, at 6:38 p.m., the public hearing
19 was concluded.)

C E R T I F I C A T E

1
2
3 IN RE: 2015-2019 State of Texas Consolidated
4 Plan public hearing
5 LOCATION: San Antonio, Texas
6 DATE: September 30, 2014

7 I do hereby certify that the foregoing pages,
8 numbers 1 through 17, inclusive, are the true, accurate,
9 and complete transcript prepared from the verbal
10 recording made by electronic recording by Joseph M.
11 Schafer before the Texas Department of Housing and
12 Community Affairs.
13
14
15
16
17

18 _____ 10/8/2014
19 (Transcriber) (Date)
20

21 On the Record Reporting
22 3636 Executive Ctr Dr., G-22
23 Austin, Texas 78731
24
25

TEXAS DEPARTMENT OF HOUSING AND COMMUNITY AFFAIRS

DRAFT STATE OF TEXAS
2015-2019 CONSOLIDATED PLAN

PUBLIC HEARING

Boggus Conference Room
Harlingen Public Library
410 76 Drive
Harlingen, Texas

11:15 a.m.
Thursday,
October 2, 2014

PRESIDING: ELIZABETH YEVICH, Director
TDHCA Housing Resource Center

ON THE RECORD REPORTING
(512) 450-0342

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I N D E X

SPEAKER

PAGE

Introduction

3

Public Comment:

none

P R O C E E D I N G S

1
2 MS. YEVICH: Good morning. My name is
3 Elizabeth Yevich, with the Texas Department of Housing
4 and Community Affairs. Today is Thursday, October 2,
5 2014, and the time is 11:15 a.m.

6 We are here in Harlingen for the hearing for
7 the Draft 2015-2019 State of Texas Consolidated Plan.
8 The hearing was to begin at 11:00. Again, it is 11:15.
9 There is no one here to participate as a witness;
10 therefore, this hearing is now officially closed.

11 (Whereupon, at 11:16 a.m., the public hearing
12 was concluded.)

TEXAS DEPARTMENT OF HOUSING AND COMMUNITY AFFAIRS

DRAFT 2015-2019 STATE OF TEXAS
CONSOLIDATED PLAN

PUBLIC HEARING

Room 170
Stephen F. Austin State Office Building
1700 N. Congress Avenue
Austin, Texas

Monday,
October 6, 2014
5:18 p.m.

BEFORE :

ELIZABETH YEVICH, Director
Housing Resource Center

ON THE RECORD REPORTING
(512) 450-0342

I N D E X

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Speakers:	
Trace Davis	5
Matt Hull	7

P R O C E E D I N G S

1
2 MS. YEVICH: Good afternoon, or good early
3 evening. Today is Monday, October 6, 2014, and the time
4 is 5:18 p.m.

5 My name is Elizabeth Yevich, and I am with the
6 Texas Department of Housing and Community Affairs.
7 Welcome to this public hearing in Austin, and it's on the
8 Draft 2015-2019 State of Texas Consolidated Plan, known
9 as the plan. This hearing is an opportunity to obtain
10 the view of citizens on this plan.

11 If you are interested in speaking, I need to
12 remind you to please fill out a witness affirmation form.
13 Also, as you speak, please provide your name and who you
14 represent. As a reminder, we are here to accept public
15 comment and will not be able to respond to questions.

16 If you would like to submit written comment at
17 a later time, information is located at the sign-in
18 table. Please note all comments must be received no
19 later than 6:00 p.m. Central Time next Monday, October
20 13.

21 A little bit of background. The Texas
22 Department of Housing and Community Affairs, or TDHCA,
23 coordinates the preparation of the plan with the Texas
24 Department of Agriculture and the Texas Department of
25 State Health Services. At this time I'd like to

1 introduce, we do have someone here with the Texas
2 Department of Agriculture, Chad Hinds.

3 The plan will be submitted to the U.S.
4 Department of Housing and Urban Development, also known
5 as HUD. The plan covers the state's administration of
6 four programs: the Community Development Block Grant,
7 administered by the Texas Department of Agriculture; the
8 Housing Opportunities for Person with AIDS, administered
9 by the Department of State Health Services; and the
10 Emergency Solutions Grants Program and Home Investment
11 Partnership Program, administered by TDHCA.

12 Under the Texas Community Development Block
13 Grant Program, or CDBG, assistance is available to non-
14 entitlement general purpose units of local government,
15 including cities and counties that are not participating
16 or designated as eligible to participate in the
17 entitlement portion of the Federal CDBG Program. And
18 we're going to take comments on each of these programs,
19 so the first one is CDBG, and is there anyone here to
20 comment on this program at this time?

21 (No response.)

22 MS. YEVICH: Seeing none, we'll move on to the
23 HOME Program. The HOME Program awards funding to various
24 entities for the purpose of providing safe, decent,
25 affordable housing across the State of Texas. To provide

1 this kind of support to communities, HUD awards an annual
2 allocation of approximately \$24 million to TDHCA.

3 Under the HOME Program, TDHCA contracts with
4 applicants for the administration of the Homebuyer
5 Assistance Program, including a contract for deed set-
6 aside to assist in the conversion of contract for deed
7 arrangements into a warranty deed, Homeowner
8 Rehabilitation Program, Tenant-Based Rental Assistance
9 Program, and rental housing development programs. In
10 accordance with the HOME final rule, 15 percent of the
11 total HOME allocation is set aside for activities
12 conducted by the community housing development
13 organizations, known as CHDOs.

14 Is there anyone here to comment on the HOME
15 Program?

16 Mr. Davis, please come forward, and you can
17 stand right there, I believe there's a mike.

18 MR. DAVIS: Good evening. I'm Trace Davis.
19 I'm with GrantWorks, and I'm just going to summarize my
20 comments. I have them in writing and I'll give them to
21 you when I'm done.

22 I'm commenting in specific in relation to the
23 housing rehab assistance, or the HRA activity with the
24 HOME Program, and the cost of getting a household to the
25 point that it's ready to set up for the HRA program is

1 very high. You've got to take the applications, you have
2 to work with each homeowner individually, you have to do
3 area-wide and site-specific environmental clearances, you
4 have to have an appraisal that's paid for up front, and
5 you have to obtain clear title commitment. This takes a
6 lot of time and it is very, very expensive.

7 Because of this, I strongly encourage TDHCA to
8 go back to a contract system, but to address the
9 Department's concerns about expenditure rates, my
10 recommendation would be to not fund that contract until
11 after a 12-month period, give people three months to set
12 up between months 12 and 15. Anything that's not set up
13 during that time period, you lose those funds.

14 Any administrators that have set up their five
15 in that period of time, if they have more ready to go,
16 they can have a month to set up a couple more to get
17 those funds committed very, very quickly, won't change
18 your expenditure rate, and it guarantees that there's at
19 least some assistance available for the work that you've
20 done up front to get these people ready.

21 In lieu of doing that, I would recommend that
22 you do true first-come, first-served where you let people
23 set up as they have these homeowners ready to go, but in
24 doing that you would need to publish what number they are
25 in line so you can tell these homeowners: Hey, it's

1 going to be looks like two years probably before there's
2 funds available because you're number whatever, 150, on
3 the list.

4 And I would also strongly encourage, if you
5 went that way, to limit the number of administrators that
6 have a registration system participation agreement at any
7 given time. Otherwise, you'll end up with a three-year
8 waiting list and a two-year agreement for the
9 administrators, so it will be unworkable as well.

10 I do want to take this opportunity to commend
11 the HOME Program, the director and staff. There's never
12 been a better group that we've worked with, been doing
13 this since the beginning of HOME, and very, very much
14 appreciate.

15 I know the reservation system has been tough
16 for everybody involved, so really appreciate their
17 willingness to work with us and try and make it better.

18 Thank you very much.

19 MS. YEVICH: Thank you.

20 Do we have someone else to speak on HOME?

21 MR. HULL: Hi. I'm Matt Hull. I'm with the
22 Texas Association of Community Development Corporations.
23 We're a statewide trade association representing
24 nonprofits, CHDOs and community development nonprofits
25 around the state building community housing and doing

1 community economic development.

2 I wanted to speak specifically on two issues.
3 One is the reservation system. I would echo Mr. Davis's
4 comments about the reservation system and the need for
5 change and possibly going back to a contract system.
6 While not a perfect system, it certainly seemed more
7 equitable than the current reservation system which has
8 to do more with the number of staff people you have and
9 how quickly you can press the enter button than it does
10 the actual need in your community.

11 My main comments are related to down payment
12 assistance, and in looking at the Draft Consolidated
13 Plan, it seems as if down payment assistance is being
14 omitted out of the Con Plan and out of the HOME Program
15 for the next five years. I would certainly encourage the
16 state to reconsider that and to put as much money into
17 down payment assistance as it promotes homeownership and
18 asset building in low income communities in Texas. And
19 despite what the market may have told you over the past
20 six years, homeownership is still the most viable way for
21 low income families to enter into the economic mainstream
22 and build assets that they can pass on generation after
23 generation.

24 We understand the need for the other programs,
25 homeowner rehab as well as tenant-based rental

1 assistance, but omitting down payment assistance in parts
2 of the state where there is no other source of down
3 payment assistance is very short-sighted by TDHCA and we
4 would certainly recommend that that program be reinstated
5 and re-funded as part of the Con Plan.

6 And we will be submitting comments in writing
7 but I mainly wanted to be here just in case I got too
8 busy to do that. So thank you so much.

9 MS. YEVICH: Thank you, Mr. Hull. Appreciate
10 it.

11 Is there anyone else here to speak to the HOME
12 Program?

13 (No response.)

14 MS. YEVICH: Seeing none, we're going to move
15 over to the Emergency Solutions Grants Program, known as
16 ESG. The ESG Program is a competitive grant that awards
17 funds to private and nonprofit organizations, cities and
18 counties in the State of Texas to provide the services
19 necessary to help persons that are at risk for
20 homelessness or homeless quickly regain stability and
21 permanent housing.

22 The ESG Program provides funding to engage
23 homeless individuals and families living on the street,
24 improve the number and quality of emergency shelters for
25 homeless individuals and families, help operate these

1 shelters, provide essential services to shelter
2 residents, rapidly rehouse homeless individuals and
3 families, and prevent families and individuals from
4 becoming homeless.

5 Is there anyone here to comment on the ESG
6 portion of the program?

7 (No response.)

8 MS. YEVICH: Hearing and seeing none, we'll
9 move over to the Housing Opportunities for Persons With
10 AIDS, known as the HOPWA Program. The Texas Department
11 of State Health Services addresses the housing needs of
12 people with HIV and AIDS through the HOPWA Program which
13 provides emergency housing assistance in the form of
14 short-term rent, mortgage and utility payments to prevent
15 homelessness, provides tenant-based rental assistance
16 which enables low income individuals to pay rent and
17 utilities until there's no longer a need or until they
18 are able to secure other housing, provides supportive
19 services which provide case management, basic telephone
20 assistance, and smoke detectors, and also provides
21 permanent housing placement which allows assistance for
22 reasonable security deposits, related application fees
23 and credit checks.

24 Is there anyone here to comment on the HOPWA
25 Program?

1 (No response.)

2 MS. YEVICH: Hearing and seeing none, is there
3 anyone here that would like to comment on anything else
4 in the draft plan?

5 (No response.)

6 MS. YEVICH: The final plan will be presented
7 at TDHCA's November 13 Board meeting.

8 With that, let me conclude, and thank you for
9 attending this hearing here in Austin.

10 (Whereupon, at 5:29 p.m., the public hearing
11 was concluded.)

TEXAS DEPARTMENT OF HOUSING AND COMMUNITY AFFAIRS

DRAFT 2015-2019 STATE OF TEXAS
CONSOLIDATED PLAN

PUBLIC HEARING

Chappell Meeting Room
Fort Worth Public Library
500 West 3rd Street
Fort Worth, Texas

Wednesday,
October 8, 2014
12:30 p.m.

BEFORE :

ELIZABETH YEVICH, Director
Housing Resource Center

ON THE RECORD REPORTING
(512) 450-0342

I N D E X

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Speakers:	
James Askey	7

P R O C E E D I N G S

1
2 MS. YEVICH: Good afternoon. Today is
3 Wednesday, October 8, 2014, and the time is 12:40 p.m.

4 My name is Elizabeth Yevich, and I am with the
5 Texas Department of Housing and Community Affairs.
6 Welcome to this public hearing in Fort Worth which is on
7 the Draft 2015-2019 State of Texas Consolidated Plan,
8 known as the plan. This hearing is an opportunity to
9 obtain the view of citizens on this plan.

10 If you are interested in speaking, I need to
11 remind you to please fill out a witness affirmation form.
12 Also, as you speak, please provide your name and who you
13 represent. As a reminder, we are here to accept public
14 comment and will not be able to respond to questions at
15 this time.

16 If you would like to submit written comment at
17 a later time, please take the information sheet located
18 on the desk which has all the details. Please note all
19 comments must be received no later than 6:00 p.m. Central
20 Time, Monday, October 13, 2014.

21 A little bit of background: The Texas
22 Department of Housing and Community Affairs, or TDHCA,
23 coordinates the preparation of the plan with the Texas
24 Department of Agriculture and the Department of State
25 Health Services.

1 The plan will be submitted to the U.S.
2 Department of Housing and Urban Development, known as
3 HUD, in early to mid-December.

4 The plan covers the state's administration of
5 four programs: The first is the Community Development
6 Block Grant, administered by the Texas Department of
7 Agriculture. The second is the Housing Opportunities for
8 Person with AIDS, which is administered by the Department
9 of State Health Services. And the third and fourth,
10 respectively, are the Emergency Solutions Grants Program
11 and the Home Investment Partnership Program, administered
12 by TDHCA.

13 The first one is CDBG, Community Development
14 Block Grant Program, and assistance in this program is
15 available to non-entitlement general purpose units of
16 local government, including cities and counties, that are
17 not participating or designated as eligible to
18 participate in the entitlement portion of the federal
19 CDBG program.

20 Is there anyone here to comment on the CDBG
21 program at this time?

22 (No response.)

23 MS. YEVICH: Hearing none, the second is Home
24 Investment Partnerships Program, known as HOME. The HOME
25 Program awards funding to various entities for the

1 purpose of providing safe, decent, affordable housing
2 across the state of Texas. To provide this kind of
3 support to communities, HUD awards an annual allocation
4 of approximately \$24 million to TDHCA.

5 Under the HOME Program, TDHCA contracts with
6 applicants for the administration of the Homebuyer
7 Assistance Program, which includes a contract-for-deed
8 set-aside to assist in the conversion of contract-for-
9 deed arrangements into a warranty deed; the Homeowner
10 Rehabilitation Program; the Tenant-Based Rental
11 Assistance Program, and rental housing development
12 programs.

13 In accordance with the HOME final rule, 15
14 percent of the total HOME allocation is set aside for
15 activities conducted by the community housing development
16 organizations, known as CHDOs.

17 Is there anyone here at this time to comment
18 on the HOME Program?

19 (No response.)

20 MS. YEVICH: Hearing and seeing none, next is
21 the Housing Opportunities for Persons With AIDS, known as
22 the HOPWA Program.

23 The Texas Department of State Health Services
24 administers and addresses the housing needs of people
25 with HIV and AIDS through the HOPWA Program which

1 provides emergency housing assistance in the form of
2 short-term rent, mortgage and utility payments to prevent
3 homelessness.

4 It also provides tenant-based rental
5 assistance which enables low-income individuals to pay
6 rent and utilities until there is no longer a need or
7 until they are able to secure other housing.

8 It provides supportive services which can be
9 case management, basic telephone assistance, and smoke
10 detectors, and provides permanent housing placement which
11 allows assistance for reasonable security deposits,
12 related application fees and credit checks.

13 Is there anyone speak on the HOPWA portion?

14 (No response.)

15 MS. YEVICH: Hearing and seeing none, we'll
16 move over to the Emergency Solutions Grants Program,
17 known as ESG.

18 The ESG Program is a competitive grant that
19 awards funds to private nonprofit organizations, cities
20 and counties in the state of Texas to provide the
21 services necessary to help persons that are at risk of
22 homelessness or homeless quickly regain stability and
23 permanent housing.

24 The ESG Program provides funding to engage
25 homeless individuals and families living on the street,

1 improve the number and quality of emergency shelters for
2 homeless individuals and families, help operate these
3 shelters, provide essential service to shelter residents,
4 rapidly rehouse homeless individuals and families, and
5 prevent families and individuals from becoming homeless.

6 Is there anyone here to comment on the ESG
7 program?

8 Yes, sir? Mr. Askey, please come up.

9 THE REPORTER: If you'll state your name
10 again.

11 MR. ASKEY: James Askey.

12 My name's James Askey, and I represent Safe
13 Haven of Tarrant County here today. We'd like to thank
14 the Texas Department of Housing and Community Affairs for
15 hosting a local hearing and the opportunity to provide
16 public comment on the Draft 2015-2019 State of Texas
17 Consolidated Plan.

18 There's a strong connection between domestic
19 violence and homelessness. As such, building solutions
20 for survivors of domestic violence and their families
21 requires understanding the connection between
22 homelessness and violence against women.

23 Victims of domestic violence suffer not only
24 the physical violence but also the devastation of
25 placement from their homes. As a result, affordable

1 housing issues become a serious consequence of domestic
2 violence.

3 And unintended consequence of the decision to
4 transfer the funding priority for Emergency Solutions
5 Grant programs to the local continuums of care is that
6 the victims of domestic violence are not included in the
7 scoring goals to maximize the available HUD funding based
8 on the current national priority of serving the
9 chronically homeless.

10 This leads to less availability of HUD funding
11 for family violence shelters and transitional housing
12 funds dedicated to domestic violence.

13 The use of family violence shelters and
14 transitional housing programs has shown to be very
15 successful in providing positive outcomes. In the past
16 year and a half, Safe Haven of Tarrant County has
17 graduated from its transitional housing program 19
18 survivors of domestic violence.

19 During this time they were able to move from
20 dangerous, abusive situations in the stable, supportive
21 transitional housing, ultimately moving into permanent
22 housing.

23 They paid down over \$53,000 in debt and saved
24 an additional \$50,000. Several were able to purchase
25 vehicles, providing additional independence and the

1 ability to resume a life free from violence.

2 Safe Havens recommends including priorities,
3 scoring methods, and outcomes that match the needs of
4 family violence survivors and recognizes unique barriers
5 they face.

6 We recommend maintaining the allowance for
7 family violence programs to utilize the Emergency Shelter
8 Grant funds to support emergency shelters and
9 transitional housing for family violence services
10 specifically. These efforts have proved to be highly
11 successful through the years.

12 Emergency family violence shelters and
13 transitional housing programs must exist to allow victims
14 and survivors to flee the abusive relationships and have
15 appropriate and available domestic violence specific
16 housing options and supportive services.

17 The trend of limiting these long-term
18 successful opportunities for family violence programs
19 represents one of the most significant areas of the plan
20 in need of augmentation and greater attention.

21 Thank you again for the opportunity to provide
22 feedback on the State of Texas Consolidated Plan.

23 MS. YEVICH: Are there any more comments on
24 the ESG program?

25 (No response.)

1 MS. YEVICH: Are there any comments on any
2 other portion of the plan at this time?

3 (No response.)

4 MS. YEVICH: Hearing and seeing none, let me
5 thank you, and with that, the hearing is concluded.

6 (Whereupon, at 12:50 p.m., the public hearing
7 was concluded.)

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C E R T I F I C A T E

IN RE: 2015-2015 State of Texas Consolidated
Plan public hearing
LOCATION: Fort Worth, Texas
DATE: October 8, 2014

I do hereby certify that the foregoing pages,
numbers 1 through 11, inclusive, are the true, accurate,
and complete transcript prepared from the verbal
recording made by electronic recording by Barbara Wall
before the Texas Department of Housing and Community
Affairs.

10/14/2014

(Transcriber) (Date)

On the Record Reporting
3636 Executive Ctr Dr., G-22
Austin, Texas 78731

2015-2019 State of Texas Consolidated Plan Comments

The State of Texas provided a public comment period for the Draft 2015-2019 State of Texas Consolidated Plan (“Plan”) from September 12, 2014, to October 13, 2014. Four public hearings were held across the State at the following dates and times:

- September 30, 2014, San Antonio, 6:00pm
- October 2, 2014, Harlingen, 11:00am
- October 6, 2014, Austin, 5:00pm
- October 8, 2014, Fort Worth, 12:30pm

Two of the hearings were held after business hours. Six people commented at the hearings. Staff members received 28 email comments and 12 letter comments. Some of these commenters submitted oral and written comments and several of the letters represented comments of more than one person. A summary of the 67 total comments, along with staff responses, is below.

1. Two commenters supported the draft Plan’s goals of using Emergency Solutions Grants (“ESG”) funds for homelessness prevention, shelter, and rapid re-housing.

(Mary Dodson and Eric Samuels, Texas Homeless Network)

Staff Response: The Texas Department of Housing and Community Affairs (“TDHCA”) thanks Mary Dodson and Eric Samuels for their comments and appreciates their appraisal of the ESG program as it was presented in the draft Plan. Staff will continue to work to provide funding for programs that help those facing homelessness to enter and maintain permanent housing. As a result of these comments, staff has clarified in the Plan that the amounts targeted for each ESG activity in Action Plan Section 25 will be dependent on the final HUD allocation and the percentages (as limited by federal rules) will depend on local Continua of Care (“CoC”) or subrecipient decisions.

2. One comment was in favor of allocating more ESG funding toward rapid re-housing and less toward prevention; rapid re-housing has been shown in evidence-based practices to better benefit families and singles. The Texas Homeless Network is providing education for local communities on appropriate prevention versus rapid re-housing efforts.

(Eric Samuels, Texas Homeless Network)

Staff Response: TDHCA thanks Eric Samuels for his comments. The most important part of TDHCA’s closer collaboration with CoCs is allowing for more local control in ESG program planning and funding. TDHCA believes that applicant organizations know the needs of their service areas, know the services that are available locally, and are, therefore, better equipped to determine how ESG funds should be used. For this reason,

TDHCA does not set statewide program requirements for ESG funds and only limits use of funds as required by the federal rules for ESG. Currently, those limitations only apply to funds used for Street Outreach, Emergency Shelter, and Administration.

TDHCA appreciates the work that the Texas Homeless Network does to educate providers on best practices and trends. TDHCA staff will monitor the State's actual use of funds, seek ways to communicate those findings to CoCs and their providers, and consider any program changes during preparation of the 2016 One-Year Action Plan. TDHCA does not propose changes to the Consolidated Plan at this time, and will allow local entities to determine whether an increase in funding for homelessness prevention is the appropriate priority for their programs.

3. One comment was in favor of updating some of the statistics in the Consolidated Plan regarding homelessness. The Texas Homelessness Network said it could assist with this effort. For example, the 2014 Point-in-Time counts showed that the number of homeless persons had declined statewide, while the draft Plan currently includes the 2013 Point-in-Time count reduction.

(Eric Samuels, Texas Homeless Network)

Staff response: Staff agrees with the comment and changes have been made to the Plan as a result of the information provided. The 2014 Point-in-Time count 3.8% reduction of persons experiencing homelessness has been included in Needs Assessment Section 40, Homeless Needs Assessment. The Plan's Needs Assessment and Market Analysis were written in March/April 2014 so that the Strategic Plan and One Year Action Plan could develop actions in line with the data analysis in the previous chapters. As a result, some newer datasets, such as Point in Time Counts, became available after the chapters were drafted and before the public comment period in September 2014. Staff is aware that newer datasets are available, and these sets are included in other planning documents, such as the 2015 State Low Income Housing Plan and Annual Report. Because the Needs Assessment and Market Analysis' statistics are used throughout the Plan, these chapters will remain with the datasets available at the time of drafting so that comments relating to the Plan during the public comment period will relate to the actions built upon the analysis. However, updated statistics offered through public comment will be included when possible.

4. Two commenters thanked TDHCA for consulting with the Texas Homelessness Network on CoC goals, the allocation of ESG funds, the development of coordinated assessment systems, the establishment of standards for services, and the evaluation of ESG-funded projects.

(Mary Dodson and Eric Samuels, Texas Homeless Network)

Staff Response: TDHCA thanks Mary Dodson and Eric Samuels for their comments. TDHCA will continue to work with Texas' CoCs to develop a program that best meets the needs of persons who are homeless or at risk of homelessness in Texas.

5. Thirteen commenters were in appreciation of the following items included in the draft Plan:
 - a. Consultation with various Texas family violence programs and stakeholders, several of which established the unique and critical need for shelter for survivors of domestic violence, dating violence, and stalking as well as other extended housing options;
 - b. Inclusion of domestic violence as a major category of the special needs population;
 - c. Acknowledgement of the need for a broad range of housing options for survivors of domestic violence with varying family compositions;
 - d. Acknowledgement of the importance of supportive services that enhance survivor safety and housing stability; and
 - e. Recognition of the federal requirements of the 2013 Reauthorization of the Violence Against Women Act ("VAWA").

(Toni Johnson-Simpson, Denton County Friends of the Family; Connie Sloan, Domestic Violence Prevention, Inc.; William Hall, Families in Crisis, Inc.; Marta Pelaez, Family Violence Prevention Services, Inc.; Rebecca White, Houston Area Women's Center; Mary Lee Hafley, SafeHaven of Tarrant County; Julia Spann, SafePlace; Carol Gresham, Shelter Agencies for Families in East Texas; Gloria Terry, Texas Council of Family Violence; Debbie Moseley, The Bridge Over Troubled Waters; Paige Flink, The Family Place; Sherry Taylor, Women's Protective Services; Frances Wilson, Women's Shelter of South Texas)

Staff Response: TDHCA appreciates the comments provided by the Texas Council of Family Violence and its affiliated agencies and acknowledges the role that domestic violence plays in homelessness and the importance of including this in planning for the use of funding to address homelessness.

6. Thirteen commenters provided additional statistics on domestic violence. For example, the United States Interagency Council on the Homeless found that 80% of families experiencing homelessness previously experienced domestic violence. Also, the National Law Center on Homelessness and Poverty shows that, depending on the region, between 22% and 57% of women experiencing homelessness report that domestic or sexual violence was the immediate cause of their homelessness. Finally, the 2013 National Census of Domestic Violence Services found that in Texas the program served 5,923 victims of domestic violence in one day, but 1,311 Texas survivors' requests for services went unmet, 500 of which were for housing.

(Toni Johnson-Simpson, Denton County Friends of the Family; Connie Sloan, Domestic Violence Prevention, Inc.; William Hall, Families in Crisis, Inc.; Marta Pelaez, Family Violence Prevention Services, Inc.; Rebecca White, Houston Area Women's Center; Mary Lee Hafley, SafeHaven of Tarrant County; Julia Spann, SafePlace; Carol Gresham, Shelter Agencies for Families in East Texas; Gloria Terry, Texas Council of Family Violence; Debbie Moseley, The Bridge Over Troubled Waters; Paige Flink, The Family Place; Sherry Taylor, Women's Protective Services; Frances Wilson, Women's Shelter of South Texas)

Staff response: Staff appreciates the provision of these additional statistics and changes have been made to the Plan as a result of this comment. These statistics have been incorporated into the Needs Assessment, Sections 10 and 40.

7. Three commenters noted that funding for the ESG Program to local CoCs has the unintended consequence of not including victims of domestic violence in the scoring goals. This is because chronically homeless populations are the current national priority, which leads to fewer available funds from the U.S. Department of Housing and Urban Development ("HUD") for family violence shelters and transitional housing for victims of domestic violence. Commenters recommend maintaining the allowance for family violence programs to use ESG funds for emergency shelters and transitional housing, independent of the CoC system.

(James Asky, Mary Lee Hafley, and Stephanie Storey, SafeHaven of Tarrant County)

Staff Response: TDHCA thanks Mary Lee Hafley, James Asky, and Stephanie Storey for their comments. The most important part of TDHCA's closer collaboration with CoCs is allowing for more local control of ESG Program planning and funding. TDHCA believes that applicant organizations know the needs of their service areas, know the services that are available locally, and are therefore better equipped to determine how funds received from TDHCA's ESG Program should be programmed. For this reason, TDHCA is contemplating a shift in funding allocation whereby local planning will determine the use of ESG funds within a CoC region. In planning this change in its funding model, TDHCA has not limited the allowance for family violence programs to use ESG funds only for emergency shelters and transitional housing. TDHCA will investigate amending the planned CoC application for direct funding document to ensure that the CoC has carefully

considered the availability of services for all persons experiencing homelessness or at risk of homelessness in its service area including victims of domestic violence.

TDHCA encourages organizations that provide services to persons fleeing domestic violence to work closely with CoCs throughout the planning process to ensure that appropriate services are available. Staff will monitor the State's actual use of funds, seek ways to communicate those findings to CoCs and their providers, and consider any program changes during preparation of the 2016 One-Year Action Plan. At this time, TDHCA proposes no changes to the Plan and will look to CoCs to determine whether funding for family violence programs is an area of high need as compared to other community needs.

8. Three commenters testified that there is a connection between domestic violence and homelessness, and that, as a result, homeless providers and domestic violence service providers should work together. Commenters offered statistics that, within the past one and a half years, SafeHaven of Tarrant County has moved 19 survivors of domestic violence from dangerous situations into transitional housing and then to permanent housing. Through SafeHaven's program, the survivors paid off debt, created savings, and many purchased vehicles.

(James Asky, Mary Lee Hafley, and Stephanie Storey, SafeHaven of Tarrant County)

Staff Response: TDHCA thanks Mary Lee Hafley, James Asky, and Stephanie Storey for their comments. Staff encourages organizations that provide services to persons fleeing domestic violence to strive for similar successes as that noted by SafeHaven of Tarrant County and work closely with CoCs and their member organizations throughout the CoC planning process to ensure that appropriate services for persons fleeing domestic violence are considered. No changes have been made to the Plan as a result of these comments.

9. Three commenters recommended that the ESG Program include priorities for serving domestic violence survivors, scoring methods that recognize the needs of domestic violence survivors, and outcomes that measure the success of domestic violence survivors. This includes emergency shelters and transitional housing with supportive services that help survivors flee abusive relationships.

(James Asky, Mary Lee Hafley, and Stephanie Storey, SafeHaven of Tarrant County)

Staff Response: TDHCA thanks Mary Lee Hafley, James Asky, and Stephanie Storey for their comments. Staff encourages organizations that provide services to persons fleeing domestic violence to work closely with CoCs to ensure that appropriate services are available. TDHCA will consider changes to the 2015 ESG Notice of Funding Availability ("NOFA") priorities, scoring methods, and outcomes that meet the needs and remove the

barriers for persons experiencing homelessness or are at risk of homelessness due to fleeing domestic violence.

10. Thirteen commenters asked for emphasis of the co-occurrence of domestic violence and homelessness. For example, the Balance of State Point in Time Count could identify domestic violence as a major contributor to homelessness.

(Toni Johnson-Simpson, Denton County Friends of the Family; Connie Sloan, Domestic Violence Prevention, Inc.; William Hall, Families in Crisis, Inc.; Marta Pelaez, Family Violence Prevention Services, Inc.; Rebecca White, Houston Area Women’s Center; Mary Lee Hafley, SafeHaven of Tarrant County; Julia Spann, SafePlace; Carol Gresham, Shelter Agencies for Families in East Texas; Gloria Terry, Texas Council of Family Violence; Debbie Moseley, The Bridge Over Troubled Waters; Paige Flink, The Family Place; Sherry Taylor, Women’s Protective Services; Frances Wilson, Women’s Shelter of South Texas)

Staff Response: TDHCA appreciates the comments provided by the Texas Council on Family Violence and its affiliated agencies. Staff encourages organizations that provide services to persons fleeing domestic violence to work closely with CoCs and their member organizations throughout the CoC planning process to ensure that Point-in-Time counts identify when domestic violence is a factor in persons becoming homeless. Where possible, TDHCA has edited the Plan to include information highlighting the co-occurrence of domestic violence and homelessness. TDHCA is unable to make substantial changes to the Plan because the Plan’s restrictive format, including the section focus and character limits for each answer, is set by HUD. For this reason, descriptions of the populations of persons experiencing homelessness are general in nature and are not descriptive of particular populations, except where directed by the Plan format.

11. Thirteen comments state that victims of domestic violence and their children are insufficiently prioritized in the Plan. They recommend the following revisions to the Plan:
 - a. Greater prioritization for domestic violence including establishing a stand-alone category within the plan specifically addressing Texas’ housing solutions for domestic violence survivors. As one of the largest populations within the homeless community, this is critical.
 - b. Formal recognition of domestic violence as one of the main factors of homelessness or being at-risk for homelessness.
 - c. Amend references indicating that Single Room Occupancy (“SRO”) housing, which is not the best practice approach when working with survivors, would meet the needs of all special populations as is indicated in the draft Plan.

- d. Continue to emphasize the importance of, and encourage all Public Housing Authorities (“PHAs”) to consider, adopting admission preferences for victims of domestic violence.
- e. Create outcomes that match the needs of family violence survivors and recognize the unique barriers they face. Although the commenters recognize and applaud the Housing First model, Texas Council for Family Violence recommends maintaining the allowance for family violence programs to utilize ESG funds to support emergency shelters and transitional housing because, for family violence services specifically, these efforts have produced highly successful outcomes throughout the years. Emergency family violence shelters and transitional housing programs must exist to allow victims and survivors to flee abusive relationships and have appropriate and available domestic violence specific housing options and supportive services. The troubling trend of limiting these long-successful funding opportunities for family violence programs represents one of the most significant areas of the Plan in need of augmentation and greater attention.
- f. Consider alternate solutions for coordinated access, data collection, and housing waiting lists, specifically in regards to Homeless Management Information System (“HMIS”), for organizations that serve survivors of domestic violence in order to comply with the federal legislation confidentiality requirements of the 2013 Reauthorization of VAWA.
- g. Assure that VAWA requirements are followed as well as having an alternate way for survivors and victims to gain access to the same types of services without being put into an identifiable centralized system.

(Toni Johnson-Simpson, Denton County Friends of the Family; Connie Sloan, Domestic Violence Prevention, Inc.; William Hall, Families in Crisis, Inc.; Marta Pelaez, Family Violence Prevention Services, Inc.; Rebecca White, Houston Area Women’s Center; Mary Lee Hafley, SafeHaven of Tarrant County; Julia Spann, SafePlace; Carol Gresham, Shelter Agencies for Families in East Texas; Gloria Terry, Texas Council of Family Violence; Debbie Moseley, The Bridge Over Troubled Waters; Paige Flink, The Family Place; Sherry Taylor, Women’s Protective Services; Frances Wilson, Women’s Shelter of South Texas)

Staff response: TDHCA appreciates the comments provided by the Texas Council of Family Violence and its affiliated agencies and provides the following response to listed items.

Regarding comment (a), where possible, TDHCA has edited the Plan to include information highlighting the co-occurrence of domestic violence and homelessness. TDHCA is unable to make substantial changes to the Plan because the Plan’s restrictive format, including the section focus and character limits for each answer, is set by HUD. For this reason, descriptions of the populations of persons experiencing homelessness are general in nature, with reference primarily to special needs populations, and are not descriptive of particular populations, except where directed by the Plan format.

Regarding comment (b), staff agrees and changes have been made to the Plan as a result of this comment. In Needs Assessment Section 10, domestic violence is now reflected as a main factor of homelessness or risk of homelessness for certain populations.

Regarding comment (c), staff agrees and changes have been made to the Plan as a result of this comment. It was not the intent of the State to imply that SROs are appropriate for all special needs households; the reference to SROs was an example of appropriate housing for one special needs populations. The State has clarified that it recognizes SROs are not appropriate for all special needs populations.

Regarding comment (d), staff agrees with the comment and changes have been made to the Plan as a result of this comment. While TDHCA does not have any direct or indirect jurisdiction over the management or operations of PHAs other than itself, TDHCA has a relationship with the Texas Housing Association and the Texas chapter of the National Association of Housing and Redevelopment Officials. Whenever possible, the State will communicate the importance of serving special needs populations.

Regarding item (e), TDHCA encourages organizations that provide services to persons fleeing domestic violence to work closely with CoCs to ensure that appropriate services are available. TDHCA will consider changes to the 2015 ESG NOFA priorities, scoring methods, and outcomes that meet the needs and remove barriers for persons experiencing homelessness or at risk of homelessness due to fleeing domestic violence

TDHCA will monitor actual use of funds, seek ways to communicate those findings to CoCs and their providers, and consider any program changes during preparation of the 2016 One-Year Action Plan. At this time, TDHCA proposes no changes to the Consolidated Plan and will look to program applicants to determine whether funding for family violence programs is the correct determination for their programs.

Regarding item (f), in accordance with the Interim ESG Rules (24 CFR §576.107), TDHCA allows for the use of ESG funds for victim services providers and legal services providers to establish and operate a comparable database that collects client-level data over time and generates unduplicated aggregate reports based on the data. As directed, this data is not to be entered into or provided to an HMIS.

TDHCA encourages organizations that provide services to persons fleeing domestic violence to work closely with CoCs and their member organizations throughout the CoC planning process to ensure that the specific privacy-related needs of persons fleeing domestic violence are met.

Regarding item (g), in accordance with the Interim ESG Rules(24 CFR §576.107), TDHCA allows for the use of ESG funds for victim services providers and legal services providers

to establish and operate a comparable database that collects client-level data over time and generates unduplicated aggregate reports based on the data. As directed, this data is not to be entered into or provided to an HMIS.

TDHCA will investigate ways to further ensure the confidentiality of persons fleeing domestic violence; in the short term through additional requirements added during preparation of the 2015 ESG NOFA, and in the long term through additions to the Texas Administrative Code.

12. Thirteen commenters asked that references to the Texas Coalition on Family Violence be revised to Texas Council on Family Violence.

(Toni Johnson-Simpson, Denton County Friends of the Family; Connie Sloan, Domestic Violence Prevention, Inc.; William Hall, Families in Crisis, Inc.; Marta Pelaez, Family Violence Prevention Services, Inc.; Rebecca White, Houston Area Women’s Center; Mary Lee Hafley, SafeHaven of Tarrant County; Julia Spann, SafePlace; Carol Gresham, Shelter Agencies for Families in East Texas; Gloria Terry, Texas Council of Family Violence; Debbie Moseley, The Bridge Over Troubled Waters; Paige Flink, The Family Place; Sherry Taylor, Women’s Protective Services; Frances Wilson, Women’s Shelter of South Texas)

Staff response: Staff agrees with this comment and the change has been made.

13. Two commenters supported the draft Plan’s goals of using Housing Opportunities for Persons with AIDS (“HOPWA”) funding tenant-based rental assistance (“TBRA”) to assist with rapid re-housing and homelessness prevention; Short-term Rent Mortgage and Utility (“STRMU”) assistance to assist with homelessness prevention; and Permanent Housing Placement to assist with homeless prevention.

(Mary Dodson and Eric Samuels, Texas Homeless Network)

Staff response: The Texas Department of State Health Services (“DSHS”) acknowledges and appreciates the comments expressed, and clarification was made to the Plan as a result of these comments. Staff has clarified in the Plan that the allocation priorities for each HOPWA activity in Action Plan Section 25 will be dependent on the final HUD allocation.

14. Two commenters asked for HOPWA to prioritize projects that use evidence-based practices and promising practices in housing, such as prioritizing Permanent Supportive Housing and a Housing First Approach, as described by the U.S. Interagency Council on Homelessness. Permanent Supportive Housing includes housing that is decent, safe, affordable, and community-based; offers voluntary and flexible services and supports to help people stay housed; does not limit the length of residency; and emphasizes tenant choice in housing and services. Housing First works to “screen in” people with significant challenges who might be

screened out of other housing options because of poor credit or prior convictions, while maintaining tenant's accountability for their behaviors that violate their lease agreements.

(Mary Dodson and Eric Samuels, Texas Homeless Network)

Staff response: DSHS' Texas HOPWA Program does not fund Permanent Supportive Housing. The HOPWA activities funded under the Texas Program are TBRA; STRMU assistance, Permanent Housing Placement assistance (which consists of assistance for housing placement costs which may include application fees, related credit checks, and reasonable security deposits necessary to move persons into permanent housing); and Supportive Services (housing case management).

The Texas HOPWA Program already assists clients with significant challenges. Many clients are on TBRA long-term because they do not qualify for any other housing assistance programs due to credit and/or rental history, criminal justice history, undocumented immigration status, and/or multiple-diagnosed issues, to name a few. For additional information, please refer to the Texas HOPWA 2014 Consolidated Annual Performance and Evaluation Report ("CAPER") narrative section titled "Barriers and Trends Overview."

15. Two commenters asked for HOPWA to prioritize persons who are in homeless situations for TBRA.

(Eric Samuels and Mary Dodson, Texas Homeless Network)

Staff response: The Texas HOPWA Program helps low-income HIV-positive clients establish or maintain affordable and stable housing; helps reduce the risk of homelessness; and improves access to health care and supportive services through housing subsidy assistance and case management (supportive services). Upon intake, HOPWA clients are screened for Ryan White/State Services program services need, such as medical case management, oral care, medication, mental health, substance abuse, food bank, medical transportation, etc. Conversely, Ryan White clients are screened for housing needs. Case Managers work with clients on an individualized care plan designed to keep them housed and linked to medical care. DSHS utilizes Ryan White-funded Minority AIDS Initiative ("MAI") funds to link incarcerated HIV-infected individuals to medical care and support services and enrollment for the HIV medications program prior to release. The Texas HOPWA Program's priority is to assist low-income, HIV-positive clients establish and/or maintain stable housing, which includes clients entering the program from a homeless or unstably-housed situation. Additional priorities are to reduce the risk of homelessness and to improve access to supportive services and health care for HIV-positive, low-income clients.

16. One comment was that Page 26 of the Market Analysis Table 14 is missing a “P” in HOPWA.

(Jean M. Langendorf, Disability Rights Texas)

Staff response: Staff agrees with the comment and has corrected the typo. Note that the typo is hard-coded into HUD’s Integrated Disbursement and Information System (“IDIS”), which is the online system created by HUD for Participating Jurisdictions to enter the consolidated planning documents. This typo must be manually corrected by TDHCA every time the Plan is downloaded from IDIS.

17. Two commenters were in favor of the draft Plan’s goal of using \$30,000,000 of Community Development Block Grant (“CDBG”) funding for colonia housing.

(Mary Dodson and Eric Samuels, Texas Homeless Network)

Staff response: The Texas Department of Agriculture (“TDA”) recognizes the need for housing improvements in colonia areas, as well as basic infrastructure and other colonia needs, and appreciates the commenters’ support. The \$30,000,000 estimate reflects expected amount of available funds throughout the five year planning period. Staff has clarified in the Plan that the amounts targeted for each CDBG activity in Action Plan Section 25 will be dependent on the final HUD allocation. No changes have been made as a result of this comment.

18. Two commenters asked for CDBG to prioritize projects that use evidence-based practices and promising practices in housing, such as prioritizing Permanent Supportive Housing and a Housing First Approach, as described by the U.S. Interagency Council on Homelessness. Permanent Supportive Housing includes housing that is decent, safe, affordable and community-based; offers voluntary and flexible services and supports to help people stay housed; does not limit the length of residency; and emphasizes tenant choice in housing and services. Housing First works to “screen in” people with significant challenges who might be screened out of other housing options because of poor credit or prior convictions, while maintaining tenant’s accountability for their behaviors that violate their lease agreements.

(Mary Dodson and Eric Samuels, Texas Homeless Network)

Staff response: Housing rehabilitation, which may include accessibility modifications for disabled persons, and public services such as supportive services are eligible uses of CDBG funds under the Community Development Fund. Regional Review Committees (“RRCs”) establish local priorities that are used to score and rank applications, and all regions are encouraged to set aside funds to be dedicated for housing rehabilitation projects. Housing rehabilitation is also eligible under the Colonia Fund Construction Program, which specifically prioritizes housing rehabilitation activities. However,

relatively few applications have been received for this type of project. No changes have been made as a result of this comment.

19. Two commenters asked that CDBG use funds for public services to end homelessness, such as meeting match requirements and supportive services.

(Mary Dodson and Eric Samuels, Texas Homeless Network)

Staff response: Public services are an eligible use of CDBG funds under the Community Development Fund, up to a maximum of 16% of the total grant application. RRCs establish local priorities that are used to score and rank applications; although no regions have specifically prioritized public services in recent years, an application that includes public services may be competitive in certain regions that have chosen to prioritize all types of projects equally. No changes have been made as a result of this comment.

20. Two commenters supported the demand for community infrastructure in South Texas Communities. In a public hearing held the summer of 2014, the Coastal Bend RRC set water, sewer and streets as funding priorities for CDBG. Commenters ask that the State continue allocating the largest percentage of CDBG funds to water facilities, sewer facilities, and street improvements. Commenters ask for the State to consider increasing the percentage for those activities.

(Larry Martinez, Alice City Texas; Ralph Gomez, Alice-Jim Wells County Economic Development Corporation)

Staff response: Staff agrees that the demand for infrastructure is great. This need is demonstrated in the local priorities set by many RRCs. The current balance of statewide priorities between the various funding categories has been consistent for several years and has been successful in allowing many communities to meet their needs. No changes have been made as a result of this comment.

21. One comment was about the difficulty of persons who only have social security benefits to afford reduced-rent apartments, since many apartment buildings require two to three times the rent in income, which social security benefits do not provide.

(Renee S. Hopper, Individual)

Staff response: Any requirement related to the amount of income necessary to be eligible to rent an apartment varies from development to development and is up to the property manager/owner. Section 10.610 of the Department's Uniform Multifamily Rules related to Tenant Selection Criteria prohibits owners from using a minimum income standard for household's with rental assistance; household's with rental assistance, such as TBRA or Section 8 Housing Choice Vouchers, are not required to have a monthly

income of more than 2.5 times the household's share of the total monthly rent. Almost all of TDHCA-monitored units accept Section 8 Housing Choice Vouchers and other types of rental assistance, allowing tenants to receive reduced rent paired with rental assistance.

22. One comment was about the difficulty of persons with credit scores under 620 or persons without a deposit or pet deposit to access reduced-rent apartments. This is in relation to rehabilitated units which may cause displacement of existing residents who may not be able to live in the new units because of credit scores or lack of deposits.

(Renee S. Hopper, Individual)

Staff response: Any requirement related to minimum credit score in order to be eligible to rent an apartment varies from development to development and is determined by the property manager/owner. TDHCA's rules related to Tenant Selection Criteria do not provide for a minimum or maximum credit score that can be used. TDHCA's proposed tenant selection rule proposes changes to protect tenants who already reside in developments from being displaced due to the application of new criteria.

23. One comment was that the discussion of farmworkers was very sparse.

(Kathy Tyler, Motivation, Education and Training, Inc.)

Staff response: Staff disagrees with the comment and no changes have been made as a result of this comment. The Plan has several different questions and sections to answer in order to accurately govern the programs involved and be approved by HUD. The information relating to farmworkers was sufficient to determine needs and also give resources for the reader to find additional information. In addition, IDIS, HUD's electronic system for inputting the Plan, has a character limit of 4,000 characters per answer. The farmworker population discussion was equal in substance to many other special needs populations in the space provided.

24. One comment was that there was no distinction between "migrant farmworkers" and "farmworkers". A recommendation was made to use the more inclusive term "farmworker" or "migrant and seasonal farmworkers" instead of only farmworkers.

(Kathy Tyler, Motivation, Education and Training, Inc.)

Staff response: Staff agrees with comment and changes have been made as a result of this comment. The inclusive terms "farmworker" and "migrant and seasonal farmworkers" are now used throughout the Plan.

25. One comment asked for clarification of farmworkers as a special needs population.

(Kathy Tyler, Motivation, Education and Training, Inc.)

Staff response: Staff made changes to the Plan as a result of this comment. Texas Government Code §2306.0721 requires that the State Low Income Housing Plan and Annual Report include consideration of farmworkers, including an estimate and analysis of their housing needs. While not officially a special needs category, farmworkers are given consideration in plans and programming of funds. Clarification of the special needs population has been made in Needs Assessment Section 45.

26. One comment asked that HOME Investment Partnerships (HOME) Program funding and other TDHCA programs funding cycles match the funding cycles of U.S. Department of Agriculture (“USDA”). This would allow applicants to create a competitive application for farm labor housing (Section 514/516). Commenter suggested the creation of a multifamily program to provide conditional commitments in order to compete for USDA funding. Because HOME funds have to be project-ready, conditional commitments are not available to attract federal dollars.

(Kathy Tyler, Motivation, Education and Training, Inc.)

Staff response: While TDHCA does allow for funding applications to propose transactions that are layered with multiple sources, the timing of application reviews and awards are largely mandated by state statute and the federal government. For instance, state statute dictates when applications for competitive housing tax credits will be accepted and when they will be awarded. In addition, for the last few years TDHCA has released NOFAs within weeks of actually receiving the HOME funds from the federal government so that those funds can be layered with housing tax credits and potentially with USDA funds. The HOME Program also has strict federal deadlines for commitment and expenditure of HOME funds. TDHCA will consider the potential timelines of other federal sources when developing NOFAs for other possible funding sources, such as Tax Credit Assistance Program loan repayments. No changes were made to the Plan as a result of this comment.

27. One comment asked for pre-development funding and early commitments from the HOME Program in order to attract USDA funding for farmworker housing.

(Kathy Tyler, Motivation, Education and Training, Inc.)

Staff response: TDHCA’s HOME funds are in high demand since funding levels were reduced significantly in 2012. Therefore, TDHCA has prioritized development funding over pre-development funding in order to produce more units of affordable housing and be in a position to recycle the funds for future development. In addition, TDHCA needs to manage commitment and expenditure timelines imposed by HUD, making it difficult to

sustain commitments for long periods of time without actually funding the transactions. No changes were made to the Plan as a result of this comment.

28. One commenter noted that only 15 migrant farmworkers were reported to be served through HOME from 2005 through 2013, according to the CAPERs. To serve more farmworkers, the commenter offered four suggestions: (a) create a small program specifically for farmworkers; (b) conduct better outreach for farmworker populations; (c) require reporting of farmworkers assisted; and (d) change the term “migrant farmworker” to the more inclusive “farmworker” to get a better count of those assisted.

(Kathy Tyler, Motivation, Education and Training, Inc.)

Staff response: Staff agrees with some of the comments and changes have been made to the Plan as a result of the comments. Regarding suggestion (a), TDHCA makes available Community Service Block Grant (“CSBG”) discretionary funds for farmworkers as permitted by CSBG statute, 42 U.S.C. §9908, which requires that TDHCA support activities designed to assist migrant or seasonal farmworkers. In addition, as part of the 2010-2011 Housing Trust Fund Plan, TDHCA included several efforts to increase capacity in rural Texas in coordination with the Rural Housing Workgroup, advocates, local rural housing administrators, and USDA. Despite this coordinated effort, most of the funds were not accessed and have been utilized to address other housing needs. Given limited funding resources, TDHCA strives to program its funds in ways that do not preclude farmworkers from accessing affordable housing rather than creating small programs. The high demand for HOME funds makes it difficult to provide even a small set-aside for specific populations.

Regarding suggestion (b) concerning outreach for particular populations, Affirmative Marketing Plans require that property owners reach out to groups that are least likely to apply for program assistance. Although farmworkers are not a population listed on HUD’s Form 935.2A, related to Affirmative Marketing Plans, some of the groups targeted in those plans, such as minority populations, likely include farmworkers.

Regarding suggestion (c), the reporting of an individual’s status is a voluntary process and TDHCA cannot require grantees to solicit an individual’s status as a farmworker or non-farmworker. In addition there is neither a specific incentive for a household to divulge their status in this regard nor a specific incentive for the HOME grantee to request such information. On this basis, staff believes that the figure reflected in the CAPERs is likely to be understated.

Regarding suggestion (d), the term “migrant farmworker” has been changed to “farmworker” throughout the Plan.

29. One commenter requested implementation of recommendations cited in the *Texas Rural Farmworker Housing Analysis* and asked TDHCA leadership to bring recommendations into fruition in the State.

(Kathy Tyler, Motivation, Education and Training, Inc.)

Staff response: Staff disagrees with the comment, and no changes have been made as a result of this comment. Many of the recommendations from the Texas Rural Farmworker Housing Analysis that relate to the HOME, ESG, CDBG or HOPWA programs have been given as individual comments by Motivation Education, and Training, Inc, and are therefore answered in other staff responses related to farmworker housing. Two recommendations that were not given individually as comments and that may relate to the programs governed by the Plan are as follows:

- a. provide incentives to use existing or planned housing stock for farmworkers. The analysis states that government entities should explore ways to assist and/or create incentives for developers of existing or planned non-farmworker housing to market their projects to farmworkers, and*
- b. create a rental or operating subsidy to sustain rural farmworker projects. The analysis states that, because farmworker housing often has fluctuating occupancies due to the nature of agricultural industry (e.g., seasonal work, migrant farmworkers, etc), consideration should be given to establishing rental and operating subsidies to support farmworker housing during periods of low occupancies.*

Concerning recommendation (a), many HOME rental developments are layered with Housing Tax Credits, and, for the last several years the Housing Tax Credit Program has provided a scoring incentive for serving several special needs populations, including farmworkers. Also, in 2015 the HOME Program is offering funds for the rehabilitation of multifamily units. These funds may be paired with USDA funds, such as Section 502 or Section 514/516, which may also focus on farmworker housing. No changes have been made to the Plan as a result of this comment.

Concerning recommendation (b), HOME funds cannot be used as an operating subsidy. No changes have been made to the Plan as a result of this comment.

30. One commenter asked for a TDHCA staff person to provide assistance to organizations seeking to provide farmworker housing or rural housing options.

(Kathy Tyler, Motivation, Education and Training, Inc.)

Staff response: Rural and farmworker housing options vary among different housing activities; staff with expertise in each program's uses and requirements are always available to work with organizations to determine how their program funds may be able to be used to serve farmworker or rural housing. TDHCA is committed to addressing rural housing needs within the confines of existing resources. No changes were made to the Plan as a result of this comment.

31. Two commenters were in favor of the draft Plan's proposed use of HOME funding TBRA for rapid re-housing and construction and rehabilitation of multifamily affordable housing.

(Mary Dodson and Eric Samuels, Texas Homeless Network)

Staff response: Staff agrees with the comment. TDHCA appreciates the commenters' support for the Plan to use HOME for TBRA and construction and rehabilitation of multifamily affordable housing. As a result of these comments, staff has clarified in the Plan that the amounts targeted for each HOME activity in Action Plan Section 25 will be dependent on the final HUD allocation, but the initial percentages allocated per activity will remain approximately the same.

32. Two commenters asked that HOME funds be used to prioritize persons who are in homeless situations for TBRA and families experiencing homelessness for affordable units in HOME multifamily properties.

(Mary Dodson and Eric Samuels, Texas Homeless Network)

Staff response: HOME TBRA Administrators may already design such a priority in their TBRA Program giving preferences to population in the special needs category provided that the limitations or preferences do not violate nondiscrimination requirements in 24 Code of Federal Regulations §92.350. TDHCA's HOME multifamily program funds are primarily layered with Housing Tax Credits and therefore can be used to serve more families at 30% area median income ("AMI"). In addition, the owners of these developments are required to accept tenants participating in rental assistance programs. Developments financed with both HOME and Housing Tax Credits, which constitute the vast majority of the HOME portfolio, are incentivized to set aside units for tenants with special housing needs, including homeless populations. No changes were made to the Plan as a result of this comment.

33. Two commenters asked that HOME funds be used to prioritize projects that use evidence-based practices and promising practices in housing, such as prioritizing Permanent Supportive Housing and a Housing First Approach, as described by the U.S. Interagency Council on Homelessness. Permanent Supportive Housing includes housing that is decent, safe, affordable and community-based; offers voluntary and flexible services and supports to help people stay housed; does not limit the length of residency; and emphasizes tenant choice in housing and services. Housing First works to “screen in” people with significant challenges who might be screened out of other housing options because of poor credit or prior convictions, while maintaining tenant’s accountability for their behaviors that violate their lease agreements.

(Mary Dodson and Eric Samuels, Texas Homeless Network)

Staff response: TDHCA’s HOME multifamily program funds are primarily layered with Housing Tax Credits, and those developments are required to provide a number of services to the tenants. In addition, TDHCA allows managers and owners of these developments to adjust the services provided in order to meet the specific needs of the tenants. No changes were made to the Plan as a result of this comment.

34. One comment recommends that HOME create a set-aside for TBRA under the Persons with Disabilities allocation to assure a quick solution to those confined to institutions waiting to move to the community on the Project Access wait list.

(Jean M. Langendorf, Disability Rights Texas)

Staff response: Five percent of HOME funds are specifically reserved by statute for persons with disabilities per Texas Government Code §2306.111(c)(2), but households with members who are disabled are also served using non-set-aside funding. TDHCA strongly supports initiatives to increase the ability of persons with disabilities to exit institutions and has taken proactive steps to guide administrators on how to “bridge” a client from the Project Access waiting list to the HOME TBRA Program. However, holding funds in a set aside solely for Project Access clients might place TDHCA in a position of having to deny an equally-qualified person with a disability not exiting an institution from access to assistance.

In the draft Plan, TDHCA set a goal for allocating more resources toward TBRA than in past years because of the evidence of high rates of renter cost burden. While the increased funding goal for TBRA does not specifically create a set aside for persons with disabilities or persons confined to institutions, it does increase the availability of funding for all populations. No changes to the Plan were made based on this comment.

35. One comment actively opposed funding HOME TBRA. Commenter believes that the program does not benefit the intended recipients (e.g., the tenants) and primarily benefits the landlords. Commenter suggested that the main use of TBRA is to allow tenants on the Section 8 Housing Choice Voucher waiting list to have housing until he/she receives a Section 8 voucher, thus remaining on assistance and not moving toward self-sufficiency. In addition, since TBRA is only available for two years but waiting lists are usually five years long, it is unclear what happens to the tenant after TBRA is exhausted.

(Michael Hunter, Hunter & Hunter Consultants, Inc.)

Staff response: Staff disagrees with this comment. Proposed funding in the Consolidated Plan reflects that currently the most common housing problem is moderate to severe cost burden, especially for households with incomes between 0-30% AMI, which is the income range of a majority of TBRA recipients. Using funds to help minimize cost burden is consistent with the Needs Assessment results. While TBRA is designed as short-term assistance to promote self sufficiency, TBRA can be available for up to five years for households that are currently on waiting lists for other types of assistance, such as Section 8 Housing Choice Vouchers, which provides them time to receive a voucher if the wait is up to five years. No changes are recommended based on this comment.

36. Twenty-eight commenters were in favor of reinstating the HOME Homebuyer Assistance Program. Commenters communicated that this program has been of tremendous help to thousands of Texans. Several commenters had worked to provide HOME homebuyer assistance to new homebuyers and wrote about the happiness of and life-changing effect it had on the persons and families receiving assistance. One commenter had used the HOME homebuyer assistance program personally and communicated that without the program she and her family would still be renting. She also praised the homebuyer education courses and the tools provided by the Homebuyer Assistance Program. Two commenters used the phrase “American Dream” to describe how homebuyer assistance affects lives.

(Alex Coronado, Alto Vista Realty; Paul K. Stevens, City of Waxahachie; Carlos Buitron, Nadia Erosa, Gina Gonzalez, Nick Mitchell-Bennett, Christina Herrera, Luciana Morales, Maria Pena, and Cynthia Rocha, Community Development Corporation of Brownsville; Maria I. Olivarez, Community Loan Center of Brownsville; Roberto Medrano, Diocese of Brownsville; Donna M. Johnson, Grantworks; Judge Richard Anderson, Harrison County Housing Finance Corporation and East Texas Housing Finance Corporation; Michael Hunter, Hunter & Hunter Consultants, Inc.; Vaughn Cox, La Union del Pueblo Entero; Joy Horak-Brown, New Hope Housing; Judy Martin, Paris Habitat for Humanity; Cynthia Gilcrease, Regency Post Acute Healthcare System; Jesse Miller, individual; Larry Hollmann, individual; Sofia L. Reyes, individual; Alicia Hernandez, Rio Grande Valley Abstract Co., Inc.; Donna Allen, Rockwall Housing Development Corporation; Matt Hull, Texas Association of Community Development Corporations; Reynaldo D. Vasquez, U.S.

Small Business Administration; Traci Wickett, United Way of Southern Cameron County; Ren Valdez, University of Texas at Brownsville)

Staff response: Staff agrees that homebuyer assistance programs serve a need in the community. The draft 2015 One Year Action Plan did not eliminate funding for homebuyer assistance through the HOME Program, and the final Plan allows for homebuyer assistance as an eligible activity. The Plan does not, however, prioritize funding for down payment assistance activities recognizing that there are multiple funding sources available statewide for down payment assistance in addition to the State of Texas' HOME funds, including TDHCA's Homeownership Programs. The One-Year Action Plan section of the Consolidated Plan has been revised to clarify that homebuyer activities are an eligible use of funds and that TDHCA may use more than one method to distribute HOME funds as described in future NOFA releases.

37. Five commenters communicated that there is high demand for homebuyer assistance. Two commenters specifically talked about demand in the Rio Grande Valley, such as Hidalgo and Cameron counties. One commenter talked about the demand in Rockwall and one commenter talked about demand in Paris. One additional commenter said that demand for homeownership is high, but the current HOME reservation system does not allow interest in homebuyer assistance to be adequately captured.

(Nick Mitchell-Bennett, Community Development Corporation of Brownsville; Roberto Medrano, Diocese of Brownsville; Michael Hunter, Hunter & Hunter Consultants, Inc.; Judy Martin, Paris Habitat for Humanity; Donna Allen, Rockwall Housing Development Corporation)

Staff response: Staff agrees with the comment and changes have been made to the Plan as a result of this comment. In Market Analysis Section 10, the State comments that the historically low inventory of for-sale housing indicates a demand by homebuyers and that the income distribution and cost of housing could indicate a need for homebuyer assistance. The Rio Grande Valley is in the South Texas Border Region (Region 11), Rockwall is in the Metroplex Region (Region 3), and Paris is in the Upper East Texas Region (Region 4). More details about each region can be found in the State Low Income Housing Plan and Annual Report, which is updated annually and available online at <http://www.tdhca.state.tx.us/housing-center/pubs-plans.htm>. Staff agrees that the housing market for down payment assistance in some areas of Texas may be on the rise; TDHCA offers several homebuyer programs to help meet this demand, including HOME funds. The One-Year Action Plan in the Consolidated Plan has been revised to clarify that homebuyer activities are an eligible use of funds and that TDHCA may use more than one method to distribute HOME funds as described in future NOFA releases.

38. One commenter noted that the HOME Homebuyer Assistance Program was used by veterans who found homeownership to be a practical option.

(Ren Valdez, University of Texas at Brownsville)

Staff response: Down payment assistance is an eligible activity under the TDHCA's HOME Program and it can be used to assist special needs populations, including veterans. No changes to the Plan are recommended based on this comment.

39. Twenty comments were in support of the commenters' belief that homebuyer assistance is the most or one of the most effective programs in creating lasting equity and assets for low-income Texans and is the most or one of the most effective anti-poverty programs that TDHCA offers.

(Alex Coronado, Alto Vista Realty; Maria Pena, Nick Mitchell-Bennett, Nadia Erosa, Carlos Buitron, Christina Herrera, Luciana Morales, Gina Gonzalez, and Cynthia Rocha, Community Development Corporation of Brownsville; Maria I. Olivarez, Community Loan Center of Brownsville; Michael Hunter, Hunter & Hunter Consultants, Inc.; Jesse Miller, individual; Larry Hollmann, individual; Sofia L. Reyes, individual; Vaughn Cox, La Union del Pueblo Entero; Joy Horak-Brown, New Hope Housing; Judy Martin, Paris Habitat for Humanity; Cynthia Gilcrease, Regency Post Acute Healthcare System; Reynaldo D. Vasquez, U.S. Small Business Administration; Traci Wickett, United Way of Southern Cameron County)

Staff response: Staff agrees that homeownership can be an effective anti-poverty tool while also recognizing that HOME funds are not the only source of funding available for down payment assistance. TDHCA offers homebuyer assistance programs through sources other than HOME, such as TDHCA's Homeownership Programs, and there are other funding sources around the state that can also be used to meet this need. Given limited HOME resources and the results of the needs assessment, TDHCA is focusing HOME funding on activities that address higher priority needs as identified in the consolidated planning process. No changes to the Plan are recommended based on this comment.

40. Two commenters said that using all of the non-Community Housing Development Organization (CHDO) single-family HOME funds for rental assistance will not directly encourage lower-income families to responsibly build assets and enjoy the financial and social benefits of homeownership. One commenter made reference to studies that homeownership can also result in better educational advancement for the children of homeowners, more involvement on the part of homeowners in local government, fewer incidences of teenage pregnancies and less gang involvement for homeowners' children, and that homeowners' children tend to become homeowners when they reach adulthood.

(Michael Hunter, Hunter & Hunter Consultants, Inc.; Matt Hull, Texas Association of Community Development Corporations)

Staff response: The allocation priorities identified in the 2015 One-Year Action Plan section of the Consolidated Plan reflect the conclusions of the market analysis and needs sections in terms of highest needs of the State. Changes have been made to the Plan clarifying that homebuyer assistance remains an eligible activity for HOME funds.

41. Seventeen commenters believe that the HOME Homebuyer Assistance Program moves persons from being renters to being homeowners who pay property taxes.

(Alex Coronado, Alto Vista Realty; Maria Pena, Nadia Erosa, Carlos Buitron, Christina Herrera, Luciana Morales, Gina Gonzalez, and Cynthia Rocha, Community Development Corporation of Brownsville; Maria I. Olivarez, Community Loan Center of Brownsville; Jesse Miller, individual; Larry Hollmann, individual; Sofia L. Reyes, individual; Vaughn Cox, La Union del Pueblo Entero; Judy Martin, Paris Habitat for Humanity; Cynthia Gilcrease, Regency Post Acute Healthcare System; Reynaldo D. Vasquez, U.S. Small Business Administration; Traci Wickett, United Way of Southern Cameron County)

Staff response: The needs assessment section of the Consolidated Plan identifies a great need for rental assistance for low-income Texans who may not be prepared for homeownership responsibilities. No changes are recommended to the Plan based on this comment.

42. Five commenters described the benefit of new construction of homes to be purchased with HOME homebuyer assistance. The new homes create additional tax revenue and create or sustain jobs, such as construction workers, insurance and title company staff, and Realtors. One commenter from Habitat for Humanity noted that HOME's homebuyer assistance helps her organization build more homes every year after the Habitat for Humanity receives the down payments from the prospective buyers. One commenter noted that the City of Waxahachie waived water/waste water impact fees for the new homes creating almost \$21,000 in match.

(Paul K. Stevens, City of Waxahachie; Nick Mitchell-Bennett, Community Development Corporation of Brownsville; Michael Hunter, Hunter & Hunter Consultants, Inc.; Judy Martin, Paris Habitat for Humanity; Alicia Hernandez, Rio Grande Valley Abstract Co., Inc.)

Staff response: Staff concurs on the positive economic impact that HOME construction-related activities may have and was not and is not proposing to eliminate the use of single-family HOME funds for down payment assistance. The 2015 One-Year Action Plan section of the Consolidated Plan has been revised to clarify that homebuyer activities are an eligible use of funds.

43. One comment was about the difficulty of using the reservation system to reserve funds for HOME homebuyer assistance.

(Donna Allen, Rockwall Housing Development Corporation)

Staff response: The 2015 One-Year Action Plan in the Consolidated Plan has been revised to state that TDHCA may utilize distribution methods other than the Reservation System in fiscal year 2015 and as allowed by the State's current HOME rules. The exact method(s) for distributing funds will be described in future NOFA releases.

44. One commenter disagreed that there are other sources for homebuyer assistance in the Rio Grande Valley outside of Participating Jurisdictions.

(Nick Mitchell-Bennett, Community Development Corporation of Brownsville)

Staff response: Staff disagrees with this comment. TDHCA offers homebuyer programs statewide through the HOME Program and is not proposing to eliminate homebuyer assistance as an eligible activity type at this time. In addition TDHCA's My First Texas Home Program and the Mortgage Credit Certificates Program are offered in Brownsville, Harlingen, and several other areas in the Rio Grande Valley. Lenders in other communities may also offer these programs if they wish. No changes to the Plan are recommended based on this comment.

45. One commenter disagreed that there was down payment assistance available through other sources than HOME homebuyer assistance. The down payment assistance referenced in the Plan was tied to mortgage bond programs. However, buyers with a third-party financing or local lender would not have access to down payment assistance.

(Matt Hull, Texas Association of Community Development Corporations)

Staff response: Homebuyer assistance is available statewide through various organizations, including TDHCA's HOME Program and other down payment assistance programs. While the use of a participating lender is necessary with the My First Texas Home Program offered by TDHCA, there are many other homebuyer assistance providers including Texas General Land Office's Veteran Housing Assistance Program; Texas State Affordable Housing Corporation's Homes for Texas Heroes Program, Home Sweet Texas Loan Program; the Federal Home Loan Bank which offers an Affordable Housing Program and Homebuyer Equity Leverage Partnerships; Veterans Affairs ("VA") Direct Home Loan Program for Native American veterans and VA-Guaranteed Loan Program; HUD's Good Neighbor Next Door program, Section 8 Housing Choice Homeownership Vouchers, and Section 184 Indian Home Loan Guarantee Program; and USDA's Section 502 Loan Guarantee Program. No changes are recommended to the Plan based on this comment.

46. One commenter disagreed that having other sources of funds for down payment assistance is a reason to reduce HOME homebuyer assistance. Commenter goes on to state that if other sources of assistance were counted as reasons for not providing assistance, homeowner rehabilitation would not need to be funded because of TDHCA's Housing Trust Fund's Bootstrap Loan Program, Texas Veteran's Fund, Federal Home Loan Bank programs, or Neighborhood Stabilization Program. Also, using the same logic, TBRA would not need to be funded because of Section 8 Housing Choice Voucher funding, Health and Human Services rental assistance, or the Veterans Assistance Fund.

(Matt Hull, Texas Association of Community Development Corporations)

Staff response: The 2014 State Low Income Housing Plan reports for state fiscal year 2013 that 55.62 percent of the total program funds were committed to single family homeownership, which indicates the availability of other TDHCA resources for homebuyers and helps in addressing the homeownership demand statewide. The sources of funding for homeowner rehabilitation or TBRA that come from TDHCA are much more limited than the funding for homeownership programs. TDHCA does not have control over the amount available for similar activities performed by other agencies like the Texas Veterans Commission and the Health and Human Services Commission. With limited HOME resources, TDHCA is focusing HOME funding on activities that address a higher priority need as identified in the Consolidated Planning process. No changes are recommended to the Plan based on this comment.

47. Two commenters suggested that homebuyer assistance and homeowner rehabilitation provide the longest-term assistance offered by the HOME Program, since TBRA lasts only up to 24 months while the other programs may allow the recipient of assistance to make permanent roots in the community.

(Donna M. Johnson, Grantworks; Michael Hunter, Hunter & Hunter Consultants, Inc.)

Staff response: Staff partially agrees with these comments. The Homeowner Rehabilitation Assistance Program and Homebuyer Assistance Programs are designed to be long-term assistance to a household, and TBRA is designed as short-term assistance to promote self sufficiency. It is correct that these activities target different housing needs, which is supported by the Needs Assessment. No changes are recommended based on this comment.

48. One comment was in support of the HOME Homeowner Rehabilitation Program. Commenter noted that this program has a long-term benefit for participants and has a spill-over effect so that neighbors also begin improving and maintaining their homes. Property taxes may also rise as a result of homeowner rehabilitation assistance.

(Michael Hunter, Hunter & Hunter Consultants, Inc.)

Staff response: Staff appreciates commenter's support of the Homeowner Rehabilitation Assistance Program.

49. Four comments were about the difficulty of the HOME Program's reservation system for homeowner rehabilitation. Administrators of the Homeowner Rehabilitation Program take applications from homeowners and then may not receive funding from the HOME Program because of technical difficulties with the reservation system or because the funding was taken too quickly by other administrators.

(Donald Warschak, City of Columbus; Tres Davis, Grantworks, Inc.; Teresa Offutt, Hill Country Home Opportunity Council, Inc.; Judge Rene Mascorro, Refugio County)

Staff response: The One-Year Action Plan in the Consolidated Plan has been revised to clarify that homebuyer activities are an eligible use of funds and that TDHCA may use more than one method to distribute HOME funds as described in future NOFA releases. However, the rapid reservation of funds by other administrators is not a flaw of the reservation program, but is an indicator of how significant the need for housing assistance is relative to the availability of resources.

50. One comment was about the difficulty of the reservation system for the HOME Homeowner Rehabilitation Program on builders. Because it is costly to submit a bid, builders prefer to bid on several houses at once. If multiple houses are awarded, instead of having to submit each house through a contract system, builders will be more encouraged to bid, which will bring quality builders to the program.

(Randy Malouf, Builder in Conroe, Texas)

Staff response: The Reservation System is designed to allow new entities to participate on a small scale basis while at the same time providing funding for ready-to-go activities. This model has been proven successful since its introduction; however, TDHCA also recognizes that it has some limitations. The One-Year Action Plan in the Consolidated Plan has been revised to clarify that TDHCA may use more than one method to distribute HOME funds, and that the exact method will be detailed in future NOFA releases. One possibility is the creation of a funding method that reflects some of the positive attributes of the contract system and the reservation system.

51. Four comments were about the expenses incurred to prepare an application for the HOME Homeowner Rehabilitation Program without reassurance of reimbursement, since not all applications will be funded through the Reservation System. These expenses include application intake, environmental clearance, appraisals, and ensuring clear title commitments. In addition, it is not known during time of application whether funds will be available to rebuild a site-built home or manufactured housing unit home.

(Donald Warschak, City of Columbus; Tres Davis, Grantworks, Inc.; Teresa Offutt, Hill County Home Opportunity Council, Inc.; Judge Rene Mascorro, Refugio County)

Staff response: Staff acknowledges that there are costs associated with program participation and additionally, under the reservation system, that some costs are incurred in preparation to submit the required documentation for a reservation without assurance that funds will be available when the project is ready for funding. Staff will consider possible changes to address these challenges; however, the majority of requirements are designed to limit liability and risk and to ensure readiness to proceed. No changes to the Plan are warranted based on this comment.

52. Three commenters asked that HOME's Homeowner Rehabilitation Program move back to awards through contracts which guarantee funding for a certain number of homes. Contracts would create an economy of scale for rural communities, consultants, and nonprofits. Contracts with a system of benchmarks to meet for the Administrator, such as a time limit of 12 to 15 months for set ups in the TDHCA contract system of five homes to be assisted, would also allow the current expenditure rate for homeowner rehabilitation to remain high. Finally, contracts would allow administrators and consultants to budget and plan ahead, also ensuring that a certain number of applications will be funded.

(Donald Warschak, City of Columbus; Tres Davis, Grantworks, Inc; Judge Rene Mascorro, Refugio County)

Staff response: The One-Year Action Plan in the Consolidated Plan has been revised to clarify that TDHCA may use more than one method to distribute HOME funds, and that the method will be detailed in future NOFA releases. However, one noted drawback of returning to contracts is that geographical dispersion and access to multiple funds by a broader array of housing providers, is significantly reduced as multiple units are committed to contracts with fewer providers.

53. Two commenters asked that HOME's Homeowner Rehabilitation Program move to a first-set-up, first-served system. The Reservation System currently works on the premise that all the applications are set-up, and then whichever Administrators press the reserve button first when the funds are released get the funds. If the Reservation System was changed so there is no release-date for the funding, Administrators could submit homeowners once the homeowners' application is complete.

(Randy Malouf, Builder in Conroe, Texas; Teresa Offutt, Hill County Home Opportunity Council, Inc.)

Staff response: The Consolidated Plan does not include these commenters' level of specificity with regard to how the Reservation System should be administered, and therefore no changes are recommended to the Plan based on this comment. To the extent this model is utilized it will be clarified in NOFAs.

54. One comment was about the need for HOME homeowner rehabilitation projects in Kerr, Kendall, Bandera, and Gillespie counties. Many of the residents are extremely low- to low-income homeowners living in substandard housing.

(Teresa Offutt, Hill Country Home Opportunity Council, Inc.)

Staff response: Staff agrees with the comment and the need in those areas has been noted in the Plan. TDHCA conducts an annual analysis of each region's need in the State Low Income Housing Plan and Annual Report, which can be found online at <http://www.tdhca.state.tx.us/housing-center/pubs-plans.htm>. The counties in the comment are in the Alamo Region (Region 9).

55. Four comments noted that the current HOME Program Director, Jennifer Molinari, and her team have a high degree of professionalism and willingness to work with Administrators. There have been improvements in efficiencies and attitudes since Ms. Molinari entered that position.

(Randy Malouf, Builder in Conroe, Texas; Donald Warschak, City of Columbus; Tres Davis, Grantworks, Inc; Judge Rene Mascorro, Refugio County)

Staff response: Staff appreciates the comments. TDHCA management also highly values Ms. Molinari and her team.

56. One comment noted that on Page 36 of the Needs Assessment Table 18 and page 21 of the Market Analysis Table 12, it would be important to include the breakout of the Project Access vouchers which would fit into the "Special Purpose Voucher - Disabled" category.

(Jean M. Langendorf, Disability Rights Texas)

Staff response: Staff agrees with this comment and changes have been made to the Plan as a result of this comment. The chart itself was created by HUD's IDIS and could not be edited, but a footnote has been added with the information.

57. One comment was regarding Page 37 of the Needs Assessment in which Table 19 showed that 833 voucher holders had requested accessibility features. It has not been Disability Rights Texas' experience that all voucher holders request accessibility features.

(Jean M. Langendorf, Disability Rights Texas)

Staff response: Staff agrees with this comment and changes have been made to the Plan as a result of this comment. The chart itself was created by HUD's IDIS, and is incorrect, as acknowledged by the AskOneCPD helpdesk. A footnote has been created to explain this HUD error. For TDHCA, staff agrees that 833 is too high; typical requests for accessibility features are less than 10 per year.

58. One comment was that Page 39 of the Needs Assessment would be an appropriate place to include the Project Access wait list information. Commenter states that this wait list is important to include because of the incredible need demonstrated by its length. Based on the response to the question it would appear that no applications are submitted to TDHCA for the Project Access vouchers but it is Disability Rights Texas' understanding that to be put on the wait list one must complete an application.

(Jean M. Langendorf, Disability Rights Texas)

Staff response: Staff agrees with this comment and changes have been made to the Plan as a result of this comment. The waiting lists for TDHCA's Section 8 Program and Project Access Program have been added.

59. One comment was regarding the integration of housing with other components of a successful community, such as health care, location of jobs with sufficient income, and education.

(Cynthia Rocha, Community Development Corporation of Brownsville)

Staff response: Staff agrees with this comment and the support of the housing providers working with service providers has been noted in the Plan. The integration of housing and services was noted in Action Plan Section 65.

60. Two commenters declare that the State has a dual responsibility to affirmatively further fair housing for CDBG: the State must engage in its own activities that affirmatively further fair housing; and must also ensure that any subrecipient jurisdictions to which it is providing funds comply with their individual certifications in order to affirmatively further fair housing. The commenters cite HUD Office Of Fair Housing And Equal Opportunity ("FHEO"), Fair Housing Planning Guide: Volume 1 at 3.3-3.49, Chapter 3: Fair Housing Planning Guidelines for States and State-Funded Jurisdictions, (#HUD-1582B-FHEO) as a basis for this comment.

(Madison Sloan, Texas Appleseed; John Henneberger, Texas Low Income Housing Information Service)

Staff response: Staff acknowledges the dual responsibility of the State CDBG program, and reports on both State-level activities and enforcement of subrecipient fair housing requirements annually. Staff also notes that the Consolidated Plan and the intended use of CDBG funds is not limited to describing how the funds will address impediments to fair housing choice, but addresses the many requirements and goals of the CDBG program. No changes have been made as a result of this comment.

61. Two commenters request that the “Anti-Poverty Strategy” in the Plan acknowledge that the location of housing investment and infrastructure is a major determinant of current and future poverty. They write that increasing access to affordable housing for low-income Texans must include consideration of the location of that housing in order to both comply with the State’s certification that it is affirmatively furthering fair housing and to ensure that the State’s investment of public funds is efficient and effective.

(Madison Sloan, Texas Appleseed; John Henneberger, Texas Low Income Housing Information Service)

Staff response: TDA staff agrees that the location of infrastructure has a significant impact on current and future poverty. It is for this reason that the vast majority of CDBG funds are awarded for projects that provide or improve basic infrastructure for primarily low- to moderate-income populations. Access to safe drinking water and appropriate wastewater services improves residents’ health and quality of life, and avoids the expense of obtaining bottled or bulk transport water for drinking and cooking. Installation of fire hydrants not only enhances fire safety, but can lower home insurance premiums in some areas. Reliable streets enable residents to access the area on a daily basis and provide access for emergency vehicles and school buses. Each of these improvements affirmatively furthers fair housing by improving living conditions in existing low- to moderate-income communities. In addition, TDA provides funding for infrastructure for projects that commit to creating and retaining jobs for primarily low- to moderate-income persons, a powerful tool in both the anti-poverty strategy and in affirmatively furthering fair housing by securing local job opportunities. Language will be adjusted in the Anti-Poverty strategy to address this comment.

TDHCA staff agrees with part of the comment and changes have been made to the Plan as a result of the comment. While locating reduced-rent housing or encouraging housing subsidy recipients to move into areas with good schools, low unemployment, and low crime along with other positive factors may help break the cycle of poverty, it is also important to provide diversity in housing options and to allow tenants to remain in communities in which they have strong ties. Changes have been made to Strategic Plan Section 70, Anti-Poverty Strategy.

62. Two commenters support HOME Multifamily funds to be paired with Housing Tax Credits, which not only leverages those funds to produce a more efficient use of resources, but means that those funds are expended on projects that are specifically scored on the basis of access to opportunity or, alternatively, on the presence of real and meaningful community revitalization. This is not presented as an action that affirmatively furthers fair housing, but it is a significant and meaningful one.

(Madison Sloan, Texas Appleseed; John Henneberger, Texas Low Income Housing Information Service)

Staff response: Staff agrees with comment and no changes to the Plan have been made as a result of the comment.

63. Two commenters support the decision of TDA to delay the new scoring criteria for further review and stakeholder input. The issues of (a) whether certain scoring criteria are a barrier to entry for small communities; (b) what is the most appropriate data to use to get an accurate picture of smaller and/or rural communities; and (c) the importance of level of need and project impact as criteria are all meaningful and important.

(Madison Sloan, Texas Appleseed; John Henneberger, Texas Low Income Housing Information Service)

Staff response: Staff agrees that stakeholder input is critical to developing a successful CDBG program. Staff also notes the following:

- (a) The comment inaccurately presents the previously proposed scoring criteria as “requiring an expenditure of resources”. The proposed scoring criteria was never a requirement to participate in the program, but rather a way to identify local initiative in communities with pressing needs that move forward with certain grant-related tasks, and allow related costs to be credited toward any matching fund requirements of the grant contract. The impact of the very small number of points proposed for completing these tasks prior to submitting the application is unlikely to exclude communities from participating in the program unless the regional scoring established by the RRCs results in very small point differentials between applicants.*
- (b) TDA must rely on consistent methods of data collection to effectively and fairly administer the statewide program. While Census data may not present an ideal “picture of smaller and/or rural communities” due to the limited data available, it is a data source that is readily available to small communities at little to no cost. The alternative of door-to-door surveys is not necessarily a more appropriate source; in addition to the expense and administrative burden on these small communities to conduct such surveys, any increase in accuracy of the data is dependent on individual residents’ willingness to respond to potentially sensitive questions on demographics and income levels, which is often a challenge for rural communities.*

(c) Staff agrees that need and project impact are important considerations. Community need indicators, using the best data that is consistently available for rural cities and counties, have been a significant factor for most RRCs in setting local priorities. TDA has allowed regions and communities to determine for themselves what type of projects will have the most impact at the local level, as the specific need varies across a large state such as Texas. TDA remains willing to consider proposals for scoring criteria that better assess project impact using consistent data sources.

64. Two commenters recommend that TDA evaluate how its' CDBG scoring criteria and priority-setting process incentivize decisions which may disadvantage groups of persons protected under the Fair Housing Act. Commenters state that this evaluation should include the use of RRCs that determine priorities for awarding most of the funds, which promotes local control but can result in certain types of communities being less competitive in the application process. The commenters go on to say that awarding CDBG funds to principally benefit low- and moderate-income persons is not sufficient to reduce poverty or affirmatively further fair housing.

(Madison Sloan, Texas Appleseed; John Henneberger, Texas Low Income Housing Information Service)

Staff response: The CDBG Program is intended to be a flexible program to accommodate local needs and priorities. The scoring criteria and priority setting process must reflect multiple goals of the program including meeting local needs, affirmatively furthering fair housing, benefiting primarily low- and moderate-income people who may or may not also be included in a protected class, addressing urgent need and blighted conditions, and ensuring applicant financial and administrative capacity.

The comment incorrectly states that "rural communities often choose to use CDBG funds for public facilities like community centers or senior centers over their public infrastructure needs." The Consolidated Plan (Needs Assessment 50) states that "In line with CDBG priorities, the majority of RRCs prioritize public improvement projects. CDBG recognizes the importance for public facility projects; however, it does not represent a large percentage of the applications received or the funds dispersed." Language will be adjusted in the Priority Needs section of the Strategic Plan to address this comment. TDA understands that there are strengths and challenges of regional scoring and priorities. Competitively scoring criteria will inevitably affect communities in different ways; variations in impact exist based on community size, most immediate community needs, tax rate decisions, or other community characteristics. The RRCs are aware of the eligible applicants in their region and in a public hearing carefully consider how each criteria may impact those communities. Staff has no record of any proposed RRC criteria that intend to exclude communities based on protected status of residents, and if submitted TDA would not approve such criteria. Language will be adjusted in the Institutional Delivery Structure section of the Strategic Plan to address this comment.

65. Two commenters recognize that TDA and TDHCA's CDBG Colonias Set-Aside program, which (1) prioritizes basic human needs, particularly water and sewer infrastructure; (2) seeks to coordinate housing and infrastructure spending; and (3) targets funding to a specific protected class that has been historically segregated; this provides another example of how the State is taking meaningful action to address an impediment to fair housing choice identified by the Draft AI.

(Madison Sloan, Texas Appleseed; John Henneberger, Texas Low Income Housing Information Service)

Staff response: Staff agrees with the comment and no changes to the Plan have been made as a result of the comment.

66. Two commenters support the importance of location in the Annual Plan, which includes in its description of CDBG goals a description of how proposed projects should be evaluated, in Action Plan Section 20, Annual Goals and Objective.

(Madison Sloan, Texas Appleseed; John Henneberger, Texas Low Income Housing Information Service)

Staff response: Staff agrees with the comment and no changes to the Plan have been made as a result of the comment.

67. Two commenters recommend that the action steps connected to identifying impediments to fair housing choice in Section 75 of its Annual Plan be incorporated into the planning process of the Plan as a whole. Commenters state that affirmatively furthering fair housing is not a silo-ed category of analysis and action, but an integral part of determining how public resources are allocated and spent.

(Madison Sloan, Texas Appleseed; John Henneberger, Texas Low Income Housing Information Service)

Staff response: Staff agrees that fair housing is integral to many levels of planning, program design, and program delivery and is reflected throughout the Plan directly and indirectly. HUD's online system for submission of the Plan, known as IDIS, has limitations on the number of characters that can be entered for many of the questions. Additionally, each question is specific to requirements in Title 24, Code of Federal Regulations Part 91, which relate to Consolidated Submissions for Community Planning and Development Programs. Options to add additional text that would allow for inclusion of fair housing considerations in other answers is not consistently provided in HUD's online system. No changes have been made as a result of this comment.