

**SUPPLEMENTAL BOARD BOOK
OF
May 21, 2020**



**Leslie Bingham, Vice-Chair
Paul Braden, Member
Sharon Thomason, Member
Leo Vasquez III, Member**

Texas Department of Housing and Community Affairs

PROGRAMMATIC IMPACT

Fiscal Year 2019 (September 1, 2018, through August 31, 2019)

Owner Financing and Down Payment	
<ul style="list-style-type: none"> 30-year, fixed interest rate mortgage loans Mortgage credit certificates Down payment, closing cost assistance Homebuyer education 	
Programs:	
<ul style="list-style-type: none"> Homebuyer Assistance Program (HBA)* Single Family Homeownership 	
Expended Funds:	\$1,693,834,604
Total Households Served:	9,605

Energy Related Assistance	
<ul style="list-style-type: none"> Utility bill payment assistance Energy consumption education Weatherization for energy efficiency 	
Programs:	
<ul style="list-style-type: none"> Comprehensive Energy Assistance Program (CEAP) Weatherization Assistance Program (WAP) 	
Expended Funds:	\$147,270,662
Total Households Served:	162,668

Multifamily New Construction	
<ul style="list-style-type: none"> Affordable rental units financed and developed 	
Programs:	
<ul style="list-style-type: none"> 9% Housing Tax Credits (HTC) 4% Housing Tax Credits (HTC) Multifamily Bonds Multifamily Direct Loan Program* 	
Expended Funds:	\$108,945,178
Total Households Served:	7,062

Homelessness Services	
<ul style="list-style-type: none"> Shelter building rehabilitation, conversion, operations Essential services e.g., health services, transportation, job training, employment services 	
Programs:	
<ul style="list-style-type: none"> Emergency Solutions Grant Program (ESG) Homeless Housing and Services Program (HHSP) 	
Expended Funds:	\$12,162,959
Total Individuals Served:	71,350

Multifamily Rehab Construction	
<ul style="list-style-type: none"> Affordable rental units financed and rehabilitated 	
Programs:	
<ul style="list-style-type: none"> 9% Housing Tax Credits (HTC) 4% Housing Tax Credits (HTC) Multifamily Bonds 	
Expended Funds:	\$56,792,063
Total Households Served:	2,503

Supportive Services	
Provides administrative support for essential services for low income individuals through Community Action Agencies	
Program:	
<ul style="list-style-type: none"> Community Services Block Grant Program (CSBG) 	
Expended Funds:	\$31,103,729
Total Individuals Served:	561,906

Owner Rehabilitation Assistance	
<ul style="list-style-type: none"> Home rehabilitation, reconstruction Manufactured housing unit replacement Accessibility modifications e.g., ramp, grab bar installation 	
Programs:	
<ul style="list-style-type: none"> Homeowner Rehabilitation Assistance Program (HRA)* Amy Young Barrier Removal Program 	
Expended Funds:	\$11,384,025
Total Households Served:	251

Rental Assistance	
<ul style="list-style-type: none"> Short, long term rent payment help Assistance linked with services Transitional assistance Security, utility deposits 	
Programs:	
<ul style="list-style-type: none"> Tenant-Based Rental Assistance (TBRA)* Section 8 Housing Choice Vouchers Section 811 	
Expended Funds:	\$11,021,909
Total Households Served:	1,932

Single Family Development	
<ul style="list-style-type: none"> Single family development, reconstruction, rehabilitation Do-it-yourself, "sweat equity" construction, rehabilitation Contract for Deed refinance 	
Programs:	
<ul style="list-style-type: none"> Single Family Development Program (SFD)* Contract for Deed (CFD) 	
Expended Funds:	\$3,769,888
Total Households Served:	85

Total Expended Funds:	\$2,076,285,016
Total Households Served:	817,362
All FY2019 data as reported in TDHCA's 2020 State Low Income Housing Plan and Annual Report (SLIHP).	
Note: Some households may have been served by more than one TDHCA program.	

* Administered through the federally funded HOME Investment Partnerships Program

TEXAS DEPARTMENT OF HOUSING AND COMMUNITY AFFAIRS
GOVERNING BOARD MEETING

A G E N D A
9:00 AM
May 21, 2020

Meeting Location: In light of the March 13, 2020, disaster declaration by the Office of the Governor, and the subsequent waivers of portions of Tex. Gov't Code, Ch. 551*, this meeting of the TDHCA Governing Board will be accessible to the public via the telephone and web link information, below. In order to engage in two-way communication during the meeting, persons must first register (at no cost) to attend the webinar via the link provided. Anyone who calls into the meeting without registering online will not be able to ask questions or provide comments, but the meeting will still be audible. A recording of the meeting will be made available to the public as soon as possible following the meeting.

Governing Board Webinar registration:

<https://attendee.gotowebinar.com/register/3008196050400077325> Dial-in number: +1 (562) 247-8422, access code 197-388-021 (persons who use the dial-in number and access code without registering online will only be able to hear the Board meeting and will not be able to ask questions or provide comments). Note, this meeting will be proceeding as a videoconference under Tex. Gov't Code §551.127, as modified by waiver.

If the GoToWebinar terminates prior to adjournment of the meeting (i.e. if the webinar session "crashes") the meeting will be recessed. A new link to the meeting will be posted immediately on the TDHCA Board meetings web page (<https://www.tdhca.state.tx.us/board/meetings.htm>) along with the time the meeting will resume. The time indicated to resume the meeting will be within six hours of the interruption of the webinar. Please note that in this contingency, the original meeting link will no longer function, and only the new link (posted on the TDHCA Board meetings web page) will work to return to the meeting.

CALL TO ORDER

ROLL CALL

Leslie Bingham, Vice Chair

CERTIFICATION OF QUORUM

Pledge of Allegiance - I pledge allegiance to the flag of the United States of America, and to the republic for which it stands, one nation under God, indivisible, with liberty and justice for all.

Texas Allegiance - Honor the Texas flag; I pledge allegiance to thee, Texas, one state under God, one and indivisible.

Resolution recognizing June as *Homeownership Month*

CONSENT AGENDA

Items on the Consent Agenda may be removed at the request of any Board member and considered at another appropriate time on this agenda. Placement on the Consent Agenda does not limit the possibility of any presentation, discussion or approval at this meeting. Under no circumstances does the Consent

* The list of Open Meeting laws subject to temporary suspension effective March 16, 2020, is available at: <https://www.texasattorneygeneral.gov/sites/default/files/images/admin/2020/Press/Open%20Meeting%20Laws%20Subject%20to%20Temporary%20Suspension.pdf>

Agenda alter any requirements under Chapter 551 of the Tex. Gov't Code, Texas Open Meetings Act. Action may be taken on any item on this agenda, regardless of how designated.

ITEM 1: APPROVAL OF THE FOLLOWING ITEMS PRESENTED IN THE BOARD MATERIALS:

EXECUTIVE

- a) Presentation, discussion, and possible action on Board meeting minutes summary for February 27, 2020, and March 26, 2020

J. Beau Eccles
General Counsel

ASSET MANAGEMENT

- b) Presentation, discussion, and possible action regarding a Material Amendment to the Housing Tax Credit Application

Rosalio Banuelos
Director of Asset Management

16170	Whitehouse Senior Village	Whitehouse
17004	Old Dowlen Cottages	Beaumont
19235	The Reserves at Saddleback Ranch	Wolfforth

- c) Presentation, discussion, and possible action regarding a Material Amendment to the Housing Tax Credit Application and Land Use Restriction Agreement

99011	Plum Creek Townhomes	Houston
02151	Windsor Gardens Apartments	Houston
04420	Tranquility Bay Apartments	Pearland
060035	Quail Ridge Apartments	Hempstead

- d) Presentation, discussion, and possible action regarding an increase to the Housing Tax Credit amount

17449	Quail Chase Apartments	Houston
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LEGAL

- e) Presentation, discussion, and possible action regarding the adoption of an Agreed Final Order concerning Coppertree Village (HTC 70131/CMTS 931)

Jeff Pender
Deputy General Counsel

MULTIFAMILY FINANCE

- f) Presentation, discussion, and possible action regarding the issuance of Determination Notices for 4% Housing Tax Credit Applications

Teresa Morales
Director of Multifamily Bonds

20410	Trader Flats	San Antonio
20412	1604 Lofts	San Antonio
20405	Gala at Fate	Fate
20413	Residences at Merritt Hill	Rowlett
20447	Franklin Park	Austin
20450	Mira Vista	San Antonio

- g) Presentation, discussion and possible action on a waiver related to §11.101(a)(1) regarding Site Requirements and Restrictions for Palladium Port Aransas (#20401) in Port Aransas

- h) Presentation, discussion, and possible action on a waiver of certain amenity requirements in 10 TAC §11.101(b)(4) (NSP1 PI Contract #77090000603 Grim Hotel, Texarkana)

Andrew Sinnott
Multifamily Loan Programs Administrator

- i) Presentation, discussion, and possible action on a waiver of certain reserve requirements in 10 TAC §10.404(a)(3)(B)

j) Presentation, discussion, and possible action on the Third Amendment to the 2020-1 Multifamily Direct Loan Notice of Funding Availability

BOND FINANCE

k) Presentation, discussion, and possible action on Inducement Resolution No. 20-018 for Multifamily Housing Revenue Bonds Regarding Authorization for Filing Applications for Private Activity Bond Authority

Teresa Morales
Director of
Multifamily Bonds

20610 Terrace at Southern Oaks Dallas
20613 Riverside Senior Living Fort Worth

HOUSING RESOURCE CENTER

l) Presentation, discussion, and possible action on the draft 2021 Regional Allocation Formula Methodology

Elizabeth Yevich
Director of
Housing Resource Center

m) Presentation, discussion, and possible action on the ratification of a substantial amendment of the 2019 State of Texas Consolidated Plan: One-Year Action Plan

SINGLE FAMILY AND HOMELESS PROGRAMS

n) Presentation, discussion, and possible action on an order adopting the repeal and new 10 TAC Chapter 7, Subchapter A, General Policies and Procedures, and Subchapter B, Homeless Housing and Services Program; 10 TAC §7.31, §7.34, §7.36, §§7.41-44, Emergency Solutions Grants; and 10 TAC §7.62 and §7.65, Ending Homelessness Fund, and directing their submission to the Texas Register for adoption

Abigail Versyp
Director of Single Family
and Homeless Programs

o) Presentation, discussion, and possible action to authorize the issuance of the 2020 Emergency Solutions Grants Program Notice of Funding Availability and publication in the Texas Register

CONSENT AGENDA REPORT ITEMS

ITEM 2: THE BOARD ACCEPTS THE FOLLOWING REPORTS:

- a) Outreach and Activities Report (April-May)
- b) Report on Extension Authority Granted by the Board to the Executive Director in Response to COVID-19
- c) Housing Finance Activity Report
- d) Report on Activities Related to the Department's Response to COVID-19 Pandemic
- e) Report on the 2021 and 2022 QAP Planning Process

Michael Lyttle
Director of
External Affairs

Teresa Morales
Director of
Multifamily Bonds

Cathy Gutierrez
Director of
Texas Homeownership

Brooke Boston
Director of Programs

Marni Holloway
Director of
Multifamily Finance

ACTION ITEMS

ITEM 3: DEPARTMENT OF POLICY & PUBLIC AFFAIRS

a) Presentation, discussion, and possible action on the agency strategic plan for fiscal years 2021-2025

Michael Lyttle
Director of
External Affairs

ITEM 4: COMPLIANCE

a) Presentation, discussion, and possible action on a Dispute of the Compliance Division's assessment of the Applicant's compliance history to be reported to the Executive Award Review Advisory Committee regarding

Patricia Murphy
Director of Compliance

20604 The Walzem San Antonio
20611 333 Holly The Woodlands

ITEM 5: BOND FINANCE

- a) Presentation, discussion, and possible action regarding the Issuance of Multifamily Housing Revenue Notes (Scott Street Lofts Apartments) Resolution No. 20-019 and a Determination Notice of Housing Tax Credits
- b) Presentation, discussion, and possible action regarding the Issuance of Multifamily Green Tax-Exempt Bonds (Green M-TEBS – 333 Holly) Resolution No. 20-020 and a Determination Notice of Housing Tax Credits
- c) Presentation, discussion, and possible action regarding the Issuance of Multifamily Green Tax-Exempt Bonds (Green M-TEBS – The Pines) Resolution No. 20-021 and a Determination Notice of Housing Tax Credits
- d) Presentation, discussion, and possible action regarding the Issuance of Multifamily Housing Revenue Bonds (The Walzem) Resolution No. 20-022 and a Determination Notice of Housing Tax Credits

Teresa Morales
Director of
Multifamily Bonds

ITEM 6: AGENCY RESPONSE TO COVID-19 PANDEMIC AND ACTIVITY UNDER HR 748, CORONAVIRUS AID, RELIEF, AND ECONOMIC SECURITY ACT (CARES ACT)

- a) Presentation, discussion, and possible action on waivers to certain provisions of Texas Administrative Code for Emergency Solutions Grants Program funds allocated to the State of Texas through the Coronavirus Aid, Relief, and Economic Security Act
- b) Presentation, discussion and possible action authorizing the Executive Director to waive or extend certain construction inspection requirements under 10 TAC Chapter 10, the Uniform Multifamily Rules, 10 TAC Chapter 11, the Qualified Allocation Plan (QAP), 10 TAC Chapter 12, the Multifamily Housing Revenue Bond Rules (Bond Rule), 10 TAC Chapter 13, and the Multifamily Direct Loan (MFDL) Rule
- c) Presentation, discussion and possible action on the programming of Housing Choice Voucher Program Administrative funds available to Texas through the Coronavirus Aid, Relief, and Economic Security Act and authorization to proceed with said programmed activities

Abigail Versyp
Director of Single Family
and Homeless Programs

Marni Holloway
Director of
Multifamily Finance

Michael De Young
Director of
Community Affairs

ITEM 7: MULTIFAMILY FINANCE

- a) Presentation, discussion, and possible action on a Determination Notice for Housing Tax Credits and an Award of Direct Loan Funds (#20416, Heritage Estates at Owen Tech, Austin extraterritorial jurisdiction)
- b) Presentation, discussion, and possible action on a Determination Notice for Housing Tax Credits and an Award of Direct Loan Funds (#20400, Palladium at West Francis, Midland)
- c) Presentation, discussion and possible action regarding eligibility under 10 TAC §11.101(b)(1)(C) related to Ineligibility of Developments within Certain School Attendance Zones and 10 TAC §11.101(a)(3)(B)(iv) related to Neighborhood Risk Factors for Preserve at the Port (#20468) in San Antonio
- d) Presentation, discussion, and possible action regarding requests for waiver of the Department’s Multifamily Program Rules for 20128 OST Lofts
- e) Presentation, discussion, and possible action on timely filed appeals under the Department’s Multifamily Program Rules

Teresa Morales
Director of
Multifamily Bonds

Marni Holloway
Director of
Multifamily Finance

20040	Espero Austin at Rutland	Austin
20041	Espero Austin at W. 24 th	Austin
20114	3300 Caroline Street	Houston
20148	High View Place	Killeen
20318	Cypress Creek at Spencer Landing	La Porte
20342	The Cottages at Cedar Ridge	Elgin

PUBLIC COMMENT ON MATTERS OTHER THAN ITEMS FOR WHICH THERE WERE POSTED AGENDA ITEMS

EXECUTIVE SESSION

The Board may go into Executive Session (close its meeting to the public):

Leslie Bingham
Vice Chair

The Board may go into Executive Session Pursuant to Tex. Gov't Code §551.074 for the purposes of discussing personnel matters including to deliberate the appointment, employment, evaluation, reassignment, duties, discipline, or dismissal of a public officer or employee;

Pursuant to Tex. Gov't Code §551.071(1) to seek the advice of its attorney about pending or contemplated litigation or a settlement offer;

Pursuant to Tex. Gov't Code §551.071(2) for the purpose of seeking the advice of its attorney about a matter in which the duty of the attorney to the governmental body under the Texas Disciplinary Rules of Professional Conduct of the State Bar of Texas clearly conflicts with Tex. Gov't Code Chapter 551; including seeking legal advice in connection with a posted agenda item;

Pursuant to Tex. Gov't Code §551.072 to deliberate the possible purchase, sale, exchange, or lease of real estate because it would have a material detrimental effect on the Department's ability to negotiate with a third person; and/or

Pursuant to Tex. Gov't Code §2306.039(c) the Department's internal auditor, fraud prevention coordinator or ethics advisor may meet in an executive session of the Board to discuss issues related to fraud, waste or abuse.

OPEN SESSION

If there is an Executive Session, the Board will reconvene in Open Session. Except as specifically authorized by applicable law, the Board may not take any actions in Executive Session.

ADJOURN

To access this agenda and details on each agenda item in the board book, please visit our website at www.tdhca.state.tx.us or contact Michael Lyttle, 512-475-4542, TDHCA, 221 East 11th Street, Austin, Texas 78701, and request the information. If you would like to follow actions taken by the Governing Board during this meeting, please follow TDHCA account (@tdhca) on Twitter.

Individuals who require auxiliary aids, services or sign language interpreters for this meeting should contact Elizabeth Yevich, at 512-463-7961 or Relay Texas at 1-800-735-2989, at least five days before the meeting so that appropriate arrangements can be made. Non-English speaking individuals who require interpreters for this meeting should contact Elena Peinado, 512-475-3814, at least five days before the meeting so that appropriate arrangements can be made.

Personas que hablan español y requieren un intérprete, favor de llamar a Elena Peinado, al siguiente número 512-475-3814 por lo menos cinco días antes de la junta para hacer los preparativos apropiados.

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BOARD ACTION REQUEST

LEGAL DIVISION

MAY 21, 2020

Presentation, discussion, and possible action regarding the adoption of an Agreed Final Order concerning Coppertree Village (HTC 70131 / CMTS 931)

RECOMMENDED ACTION

WHEREAS, Coppertree Village (Property), owned by Coppertree Village Holdings, LLC and Coppertree Apartments LLC (Owner), has demonstrated a pattern of repeated and substantive noncompliance under the land use restriction agreement and the associated statutory and rule requirements, and has been the subject of numerous tenant complaints;

WHEREAS, TDHCA accelerated its regular inspection schedule and is currently performing Uniform Physical Condition Standards (UPCS) inspections twice annually for the Property;

WHEREAS, the Property was referred for an administrative penalty for failure to timely and fully correct findings of noncompliance from a UPCS inspection conducted on June 20, 2019;

WHEREAS, representatives of Property have attended multiple informal conferences and signed a prior Agreed Final Order on February 8, 2019, for UPCS violations identified during prior inspections;

WHEREAS, the terms of the prior Agreed Final Order were violated when corrective documentation was not submitted by April 17, 2019;

WHEREAS, the full administrative penalty of \$10,000 under the prior Agreed Final Order came due as a result of that violation, and was paid May 9, 2019;

WHEREAS, the findings from the prior Agreed Final Order were fully resolved on October 4, 2019;

WHEREAS, all UPCS violations under the June 20, 2019, inspection are considered resolved, but were not resolved timely;

WHEREAS, on April 28, 2020, Owner's representatives participated in an informal conference with the Enforcement Committee and agreed, subject to Board approval, to enter into an Agreed Final Order assessing an administrative penalty of \$7,000, to be paid by June 22, 2020; and

WHEREAS, staff has based its recommendations for an Agreed Final Order on the Department's rules for administrative penalties and an assessment of each and

all of the statutory factors to be considered in assessing such penalties, applied specifically to the facts and circumstances present in this case.

NOW, therefore, it is hereby

RESOLVED, that an Agreed Final Order assessing an administrative penalty of \$7,000, subject to partial forgiveness as outlined herein, for noncompliance at Coppertree Village, substantially in the form presented at this meeting, and authorizing any non-substantive technical corrections, is hereby adopted as the order of this Board.

BACKGROUND

Coppertree Village Holdings, LLC d/b/a Coppertree Investments I LLC (67% ownership interest) and Coppertree Apartments LLC (33% ownership interest) (collectively referenced as Owner) are tenants in common for Coppertree Village (Property), a low income apartment complex composed of 322 units, located in Harris County. Records of the Texas Secretary of State indicate that Viking Management LLC d/b/a Coppertree Management LLC, is the governing person for both tenants in common, with Charles David Taylor as its sole owner. The property is managed by Preservation Management Inc. (Preservation), with Bridget York listed as the primary contact in CMTS. CMTS lists Alice Morris, as the primary contact for Owner. The primary contacts for the Enforcement Committee have been Bridget York, Director of Compliance and Transitions for Preservation, and Michele Folino, Regional Vice President for Preservation.

The Property is subject to a Land Use Restriction Agreement (LURA) signed by a prior owner in 1992 in consideration for a housing tax credit allocation in the annual amount of \$230,891 to rehabilitate and operate the Property. The Owner acquired the property in 2015, and the LURA remains in effect per Section 2 of the LURA, which stipulates that its restrictions run with the land.

Owner was first referred for an administrative penalty in 2018 for Uniform Physical Condition Standards (UPCS) findings identified during a 2017 inspection. The majority of the referred findings were resolved in response to an informal conference notice, with the only unresolved finding relating to extreme deterioration of the exterior of the community center. A plan and contract for a full rehabilitation of that building was received by the Enforcement Committee. The Committee considered the submitted plan and voted to table a decision since the Owner had not previously been referred for an administrative penalty, and work was already under contract to address the one remaining finding. Multiple delays were reported, including weather delays, unexpected discovery of a termite infestation, a gas leak, plumbing leaks, and a partial roof collapse. The repairs remained incomplete as of September 25, 2018, and the Committee requested that staff set an informal conference. Meanwhile, the Compliance Division had performed a new UPCS inspection on August 16, 2018, in response to multiple complaints and outside reports about the poor condition of the property. The corrective action deadline for that new inspection was December 4, 2018, so the informal conference was scheduled for December 18, 2018, in order to incorporate both inspections. During the informal conference, property management representatives stated that the Owner had personally funded significant repair contracts during that year, including new roofs, exterior paint, new flooring, new appliances, corrections for a HUD REAC¹ inspection, corrections for TDHCA UPCS findings, and repairs to water and fire damaged units. They also addressed issues relating to faulty electrical transformers that are directly owned by the Property, which contributed to many complaints regarding electrical outages. They had also implemented security measures to

¹ The Real Estate Assessment Center (REAC) is the inspection performed by HUD as part of the Section 8 program.

improve safety and decrease vandalism, and the property management company's regional manager is now based out of the Property.

An Agreed Final Order was approved by the Board on January 17, 2019, calling for an administrative penalty in the amount of \$10,000, with \$5,000 payable at signing and the remaining \$5,000 to be deferred and forgiven provided that Owner met the requirements of the Agreed Final Order, correcting all violations by April 17, 2019. Owner signed the Order and submitted the initial penalty payment, but changed management companies shortly before the deadline, and did not submit full corrections until October 4, 2019. The remaining penalty came due when the Order was violated; the remainder of the penalty was paid 5/9/2019.

The Compliance Division is currently performing inspections of this property twice a year due to a pattern of repeated and substantive noncompliance under the land use restriction agreement and the associated statutory and rule requirements, along with numerous complaints received regarding the property condition.

New compliance violations were identified during a UPCS inspection conducted on June 20, 2019. The Compliance Division set a corrective action deadline of October 13, 2020, and corrections were submitted on October 4, 2019, October 17, 2019, and December 2, 2019. Uncorrected violations were referred for an administrative penalty on December 4, 2019, and additional corrective documentation was submitted December 6, 2019, and February 13, 2010. A copy of the inspection report is attached to the enclosed Agreed Final Order for reference.

Property management representatives participated in an informal teleconference with the Enforcement Committee on April 28, 2020, on behalf of the owner. Committee members voted to recommend a \$7,000 administrative penalty, out of a potential maximum administrative penalty of \$11,000. All violations for the June 2019 inspection had been corrected and all but one of the referred violations had been corrected within days of referral for a penalty, but the failure to timely correct violations until referral provided further evidence of a pattern of noncompliance and failure to take sufficient care to submit complete corrections. Owner has a history of violations, previously signing an Agreed Final Order and violating its terms, however, Preservation had made improvements to overall property condition since being hired in April 2019. Preservation submitted multiple responses before the corrective action deadline for the June 2019 inspection and indicated during the informal conference that they thought their submission had been complete, with the exception of one unit where the resident would not allow access to the unit. However, numerous violations were missed, possibly because of poor organization of the submission and failure to perform a supervisory review of submissions. Preservation did not take adequate care to organize and ensure a complete response, despite knowing the penalty history and accelerated inspection schedule. A penalty was recommended because of the property's history and as a deterrent for future violations, but the Committee recommended a penalty of \$7,000 because management did make an effort to comply, is responsive to Compliance, and resolved most findings within days of the penalty referral. The only violations that were delayed until February 2020 related to a tenant who would not allow access. Additionally, members voted not to consider unresolved violations from an October

2019 inspection with a corrective action period that had just expired on April 25, 2020. Most violations for the October 2019 UPCS inspection had been timely resolved, with the exception of 18 findings relating to missing and/or damaged window screens. The October 2019 inspection has not yet been referred for a penalty, but members discussed the matter and agreed to set a future informal conference to consider the window screen violations if they are referred for a penalty and are not resolved by the end of May 2020, as a further incentive to comply.

Owner, C. David Taylor, responded to the settlement offer, apologizing for the noncompliance and agreeing to take any steps necessary to improve the relationship with TDHCA. He has agreed to the settlement offer for a \$7,000 administrative penalty relating to the June 2019 violations, and has agreed to resolve the window screen violations from the October 2019 inspection outside of that Agreed Final Order as proposed, with a completion date of May 31, 2020. He understands that a further penalty relating to the window screens is possible if those findings are not resolved. A Casualty Loss from December 2017 has since been identified and was referred for an administrative penalty on May 5, 2020, but will be considered separately.

Consistent with direction from the Department's Enforcement Committee, an administrative penalty in the amount of \$7,000 is recommended for the June 20, 2019, UPCS inspection. This will be a reportable item of consideration under previous participation for any new award to the principals of the Owner.

ENFORCEMENT ACTION AGAINST	§	BEFORE THE
COPPERTREE VILLAGE HOLDINGS, LLC	§	TEXAS DEPARTMENT OF
WITH RESPECT TO COPPERTREE VILLAGE	§	HOUSING AND COMMUNITY
(HTC FILE # 70131 / CMTS # 931)	§	AFFAIRS
	§	
	§	

AGREED FINAL ORDER

General Remarks and official action taken:

On this 21st day of May, 2020, the Governing Board (Board) of the Texas Department of Housing and Community Affairs (TDHCA or Department) considered the matter of whether enforcement action should be taken against **COPPERTREE VILLAGE HOLDINGS, LLC**, a Delaware limited liability company (Respondent).

This Agreed Order is executed pursuant to the authority of the Administrative Procedure Act (APA), Tex. Gov't Code §2001.056, which authorizes the informal disposition of contested cases. In a desire to conclude this matter without further delay and expense, the Board and Respondent agree to resolve this matter by this Agreed Final Order. The Respondent agrees to this Order for the purpose of resolving this proceeding only and without admitting or denying the findings of fact and conclusions of law set out in this Order.

Upon recommendation of the Enforcement Committee, the Board makes the following findings of fact and conclusions of law and enters this Order:

WAIVER

Respondent acknowledges the existence of their right to request a hearing as provided by Tex. Gov't Code §2306.044, and to seek judicial review, in the District Court of Travis County, Texas, of any order as provided by Tex. Gov't Code §2306.047. Pursuant to this compromise and settlement, the Respondent waives those rights and acknowledges the jurisdiction of the Board over Respondent.

FINDINGS OF FACT (FOF)

Jurisdiction:

1. During 1990, Texas-Coppertree Village Limited Partnership ("Prior Owner") was awarded an allocation of Low Income Housing Tax Credits by the Board, in an annual

amount of \$230,891 to rehabilitate and operate Coppertree Village (“Property”) (HTC file No. 70131 / CMTS No. 931 / LDLD No. 238).

2. Prior Owner signed a land use restriction agreement (“LURA”) regarding the Property. The LURA was effective December 8, 1992, and filed of record at Document Number N992894 of the Official Public Records of Real Property of Harris County, Texas (“Records”). In accordance with Section 2 of the LURA, the LURA is a restrictive covenant/deed restriction encumbering the Property and binding on all successors and assigns for the full term of the LURA.
3. Respondent took ownership of the Property on August 7, 2015, and is bound to the terms of the LURA in accordance with Section 2 thereof.
4. Respondent is subject to the regulatory authority of TDHCA.

Compliance Violations²:

5. Property has a history of violations and previously signed an Agreed Final Order on February 8, 2020, agreeing to a \$10,000 Administrative Penalty which was to be partially fully forgivable provided that Respondent submitted complete corrections by April 17, 2019. The Order was violated and the full administrative penalty was paid. Final corrective documentation was received on October 4, 2019.
6. In response to complaints received about the property and an established pattern of noncompliance, a UPCS inspection was conducted on June 20, 2019. Inspection reports showed numerous serious property condition violations, a violation of 10 TAC §10.621 (Property Condition Standards). Notifications of noncompliance were sent and an October 13, 2019 corrective action deadline was set. Corrective documentation was submitted on October 4, 2019, October 17, 2019, and December 2, 2019. Violations listed at *Exhibit 1* were referred for an administrative penalty on December 4, 2019, and final corrective documentation was received by the Enforcement Committee on December 6, 2019 and February 13, 2020, correcting all remaining findings.
7. All violations under the June 20, 2019, inspection are considered resolved.

CONCLUSIONS OF LAW

1. The Department has jurisdiction over this matter pursuant to Tex. Gov’t Code §§2306.041-.0503, and 10 TAC §2.

² Within this Agreed Final Order, all references to violations of TDHCA Compliance Monitoring rules at 10 TAC Chapter 10 refers to the versions of the code in effect at the time of the compliance monitoring reviews and/or inspections that resulted in recording each violation. All past violations remain violations under the current code and all interim amendments.

2. Respondent is a “housing sponsor” as that term is defined in Tex. Gov’t Code §2306.004(14).
3. Pursuant to IRC §42(m)(1)(B)(iii), housing credit agencies are required to monitor for noncompliance with all provisions of the IRC and to notify the Internal Revenue Service of such noncompliance.
4. Respondent violated 10 TAC §10.621 in 2019, and I.R.C. §42, as amended, by failing to comply with HUD’s Uniform Physical Condition Standards when major violations were discovered and not timely corrected.³
5. Because Respondent is a housing sponsor with respect to the Property, and has violated TDHCA rules, the Board has personal and subject matter jurisdiction over Respondent pursuant to Tex. Gov’t Code §2306.041 and §2306.267.
6. Because Respondent is a housing sponsor, TDHCA may order Respondent to perform or refrain from performing certain acts in order to comply with the law, TDHCA rules, or the terms of a contract or agreement to which Respondent and TDHCA are parties, pursuant to Tex. Gov’t Code §2306.267.
7. Because Respondent has violated rules promulgated pursuant to Tex. Gov’t Code §2306.053 and has violated agreements with the Agency to which Respondent is a party, the Agency may impose an administrative penalty pursuant to Tex. Gov’t Code §2306.041.
8. An administrative penalty of \$7,000 is an appropriate penalty in accordance with 10 TAC Chapter 2.

Based upon the foregoing findings of fact and conclusions of law, and an assessment of the factors set forth in Tex. Gov’t Code §2306.042 to be considered in assessing such penalties as applied specifically to the facts and circumstances present in this case, the Governing Board of the Texas Department of Housing and Community Affairs orders the following:

IT IS HEREBY ORDERED that Respondent is assessed an administrative penalty in the amount of \$7,000.

IT IS FURTHER ORDERED that Respondent shall pay and is hereby directed to pay the \$7,000 administrative penalty by cashier’s check payable to the “Texas Department of Housing and Community Affairs” on or before June 22, 2020, to the following address:

If via overnight mail (FedEx, UPS):	If via USPS:
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³ HUD’s Uniform Physical Condition Standards are the standards adopted by TDHCA pursuant to 10 TAC 10.621(a)

TDHCA Attn: Ysella Kaseman 221 E 11 th St Austin, Texas 78701	TDHCA Attn: Ysella Kaseman P.O. Box 13941 Austin, Texas 78711
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IT IS FURTHER ORDERED that Respondent shall follow the requirements of 10 TAC §10.406, a copy of which is included at *Exhibit 2*, and obtain approval from the Department prior to consummating a sale of the property, if contemplated.

IT IS FURTHER ORDERED that the terms of this Agreed Final Order shall be published on the TDHCA website.

[Remainder of page intentionally blank]

Approved by the Governing Board of TDHCA on May 21, 2020.

By: _____
Name: Leslie Bingham
Title: Vice Chair of the Board of TDHCA

By: _____
Name: James "Beau" Eccles
Title: Secretary of the Board of TDHCA

THE STATE OF TEXAS §
§
COUNTY OF TRAVIS §

Before me, the undersigned notary public, on this 21st day of May, 2020, personally appeared Leslie Bingham, proved to me to be the person whose name is subscribed to the foregoing instrument and acknowledged to me that he executed the same for the purposes and consideration therein expressed.

(Seal)

Notary Public, State of Texas

THE STATE OF TEXAS §
§
COUNTY OF TRAVIS §

Before me, the undersigned notary public, on this 21st day of May, 2020, personally appeared James "Beau" Eccles, proved to me to be the person whose name is subscribed to the foregoing instrument and acknowledged to me that he executed the same for the purposes and consideration therein expressed.

(Seal)

Notary Public, State of Texas

STATE OF _____ §
COUNTY OF _____ §

BEFORE ME, _____, a notary public in and for the State of _____, on this day personally appeared Charles David Taylor, known to me or proven to me through _____ to be the person whose name is subscribed to the foregoing instrument, and acknowledged to me that (he/she) executed the same for the purposes and consideration therein expressed, who being by me duly sworn, deposed as follows:

1. "My name Charles David Taylor, I am of sound mind, capable of making this statement, and personally acquainted with the facts herein stated.
2. I hold the office of Owner for Viking Management LLC, d/b/a Coppertree Management LLC, the governing person for Respondent. I am the authorized representative of Respondent, owner of the Property, which is subject to a Land Use Restriction Agreement monitored by the TDHCA in the State of Texas, and I am duly authorized by Respondent to execute this document.
3. Respondent knowingly and voluntarily enters into this Agreed Final Order, and agrees with and consents to the issuance and service of the foregoing Agreed Order by the Governing Board of the Texas Department of Housing and Community Affairs."

RESPONDENT:

COPPERTREE VILLAGE HOLDINGS, LLC, d/b/a COPPERTREE INVESTMENTS I LLC, a Delaware limited liability company,

VIKING MANAGEMENT LLC, d/b/a COPPERTREE MANAGEMENT LLC, a Washington limited liability company, its governing person

By: _____

Name: Charles David Taylor

Title: Owner

Given under my hand and seal of office this _____ day of _____, 2020.

Signature of Notary Public

Printed Name of Notary Public

NOTARY PUBLIC IN AND FOR THE STATE OF _____

My Commission Expires: _____

STATE OF _____ §
COUNTY OF _____ §

BEFORE ME, _____, a notary public in and for the State of _____, on this day personally appeared Charles David Taylor, known to me or proven to me through _____ to be the person whose name is subscribed to the foregoing instrument, and acknowledged to me that (he/she) executed the same for the purposes and consideration therein expressed, who being by me duly sworn, deposed as follows:

1. "My name Charles David Taylor, I am of sound mind, capable of making this statement, and personally acquainted with the facts herein stated.
2. I hold the office of Owner for Viking Management LLC, d/b/a Coppertree Management LLC, the governing person for Respondent. I am the authorized representative of Respondent, owner of the Property, which is subject to a Land Use Restriction Agreement monitored by the TDHCA in the State of Texas, and I am duly authorized by Respondent to execute this document.
3. Respondent knowingly and voluntarily enters into this Agreed Final Order, and agrees with and consents to the issuance and service of the foregoing Agreed Order by the Governing Board of the Texas Department of Housing and Community Affairs."

RESPONDENT:

COPPERTREE APARTMENTS LLC, a Texas limited liability company

VIKING MANAGEMENT LLC, d/b/a **COPPERTREE MANAGEMENT LLC**, a Washington limited liability company, its governing person

By: _____

Name: Charles David Taylor

Title: Owner

Given under my hand and seal of office this _____ day of _____, 2020.

Signature of Notary Public

Printed Name of Notary Public

NOTARY PUBLIC IN AND FOR THE STATE OF _____

My Commission Expires: _____

Exhibit 1

UPCS Violations

Highlighted violations were referred for an administrative penalty. All other violations were timely corrected.

Inspectable Area	Inspectable Item	Deficiency	1	2	3	Comments
Coppertree Village 1415 W Gulf Bank Rd Houston, TX 77088						
Building:						
Unit:						
	Mailbox/Signs	Mailbox Missing/Damaged	7/18/2019		L3	doors for 1917, 1913, 1806 and 1107 missing or broken.
	Parking/Drives	Ponding	7/21/2019		L2	By building 8 and unit 807
Building: Bldg 1						
Unit:						
Building Exterior						
	Windows	Cracked/Broken/Missing/Cracked Panes	7/18/2019	L1		window broken at apartment 135
Unit: 102						
	Bathroom	Lavatory Sink - Damaged/Missing	7/16/2019	L1		Sink stopper missing in the master bathroom.
	Floors	Hard Floor Covering Missing/Damaged	10/3/2019	L2		Flooring damaged at kitchen & dining room and bathroom.
	Kitchen	Dishwasher/Garbage Disposal - Inoperable	7/31/2019	L2		Dishwasher has loud noise.
	Smoke Detector	Missing/Inoperable	7/16/2019	L3		Smoke detectors missing at dining room, hallway and bedrooms 1&2
	Walls	Damaged	10/9/2019	L2		Multiple holes by entry door.
Unit: 112 vacant						
	Kitchen	Dishwasher/Garbage Disposal - Inoperable		L2		Not working.
	Outlets/Switches	Missing/Broken Cover Plates	7/12/2019	L3		Outlet covers missing. Exposed wires.
Unit: 120 vacant						
	Floors	Soft Floor Covering Missing/Damaged		L1		Damaged carpet at living room.
	Kitchen	Range Hoods/Exhaust Fans -Excessive Grease/Inoperable		L3		Range hood not working.
	Kitchen	Dishwasher/Garbage Disposal - Inoperable		L2		Garbage disposal inoperable.
	Outlets/Switches	Missing/Broken Cover Plates	7/16/2019	L3		Outlet covers missing/exposed wires.
Unit: 125						
	Doors	Deteriorated/Missing Seals (Entry Only)	7/19/2019	L3		Front door weatherstrip damaged.
	Floors	Hard Floor Covering Missing/Damaged	10/4/2019	L1		Kitchen flooring damaged.
	Floors	Soft Floor Covering Missing/Damaged	10/4/2019	L1		Carpet damaged in hallway.
	Kitchen	Range/Stove - Missing/Damaged/Inoperable	7/19/2019	L1		Stove door damaged.
	Kitchen	Dishwasher/Garbage Disposal - Inoperable	7/19/2019	L2		Dishwasher not working.
Unit: 133 vacant						
	Bathroom	Lavatory Sink - Damaged/Missing		L1		Sink stopper missing.
	Doors	Missing Door		L1		Closet door off hinges Hallway door missing.
	Doors	Damaged Surface (Holes/Paint/Rusting)		L1		Front door damaged.
	Doors	Damaged Hardware/Locks		L3		Doorknob missing at bathroom and bedroom doors.
	Doors	Damaged Frames/Threshold/Lintels/Trim		L2		Front door frame damaged.
	Kitchen	Refrigerator-Missing/Damaged/Inoperable		L1		Seal damaged. Door handle missing.
	Kitchen	Cabinets - Missing/Damaged		L2		Cabinet door and drawer missing.
	Smoke Detector	Missing/Inoperable	7/14/2019	L3		Smoke detector missing.
	Windows	Inoperable/Not Lockable		L1		Window not working in bedroom.
Building: Bldg 10						
Unit:						
Building Exterior						
	Roofs	Missing/Damaged Components from Downspout/Gutter	7/17/2019		L3	NIS repair downspout.
Unit: 1004 vacant						
	Ceiling	Bulging/Buckling		L3		Ceiling sagging.
	Doors	Damaged Surface (Holes/Paint/Rusting)		L3		Patio door damaged. Door to bedroom 2 by bathroom deteriorated.
	Doors	Deteriorated/Missing Seals (Entry Only)		L3		Back door has light.
	Walls	Damaged		L3		NIS repair by tub.
Unit: 1012						
	Bathroom	Shower/Tub - Damaged/Missing	7/19/2019	L1		Tub needs resurfacing.
	Floors	Soft Floor Covering Missing/Damaged	9/18/2019	L1		Trip hazard at entrance by carpet.
	Health & Safety	Air Quality - Mold and/or Mildew Observed	7/18/2019	L3		Mildew at window in bedroom.
	Kitchen	Refrigerator-Missing/Damaged/Inoperable		L1		Door brackets missing.

Inspectable Area	Deficiency				Comments
Inspectable Item					
Kitchen	Cabinets - Missing/Damaged			L2	Drawers nailed shut.
Kitchen	Sink - Damaged/Missing	9/18/2019	L1		Sink rusted.
Kitchen	Dishwasher/Garbage Disposal - Inoperable	9/18/2019	L2		Dishwasher not working.
Building: Bldg 11					
Unit:					
Building Systems					
Fire Protection	Missing/Damaged/Expired Extinguishers	7/17/2019	L1		Fire extinguisher used.
Unit: 1102 vacant					
Doors	Missing Door	8/28/2019	L1		Bedroom 1 closet doors missing.
Doors	Damaged Surface (Holes/Paint/Rusting)	8/28/2019	L3		Bedroom 2 Door NIS repair.
Health & Safety	Emergency Fire Exits - Emergency/Fire Exits Blocked/Unusable	7/12/2019	L3		Blocked egress.
HVAC System	Not Operable	7/2/2019	L3		Inoperable.
Kitchen	Dishwasher/Garbage Disposal - Inoperable	8/28/2019	L2		Disposal not working.
Kitchen	Sink - Damaged/Missing	8/28/2019	L1		Kitchen sink leaking.
Windows	Cracked/Broken/Missing Panes	7/3/2019	L1		Bedroom 2 cracked window.
Building: Bldg 14					
Unit:					
Building Exterior					
Walls	Stained/Peeling/Needs Paint	9/26/2019	L1		Paint peeling on exterior by 1402
Windows	Damaged/Missing Screens	9/26/2019	L1		All buildings have 3 or more screens missing.
Unit: 1402					
Bathroom	Ventilation/Exhaust System - Inoperable	7/19/2019	L2		Master bathroom fan has loud noise.
Bathroom	Shower/Tub - Damaged/Missing	7/19/2019	L1		Tub stopper missing.
Doors	Missing Door		L1		Bedroom 3 closet doors missing.
Floors	Soft Floor Covering Missing/Damaged	9/2/2019	L2		Carpet stains and damaged by kitchen. Carpet damaged at bedroom 1.
Health & Safety	Emergency Fire Exits - Emergency/Fire Exits Blocked/Unusable	7/12/2019	L3		Blocked egress.
Walls	Peeling/Needs Paint	7/19/2019	L1		Paint peeling by entrance door.
Walls	Damaged	7/19/2019	L1		Hole in wall by dining area. Wall damaged by window.
Unit: 1409 vacant					
Bathroom	Plumbing - Leaking Faucet/Pipes	7/21/2019	L1		Tub faucet handle missing. Master bathroom faucet knob missing.
Bathroom	Lavatory Sink - Damaged/Missing	7/21/2019	L1		Sink in bathroom cracked.
Health & Safety	Infestation - Insects	7/12/2019	L3		Roaches.
Kitchen	Plumbing - Leaking Faucet/Pipes	7/21/2019	L1		Leak under the kitchen sink.
Walls	Damaged	7/21/2019	L3		NIS Repair wall by stove. NIS repair wall by dishwasher. NIS repair by bedroom 2 by closet door.
Building: Bldg 15					
Unit:					
Building Systems					
Domestic Water	Water Supply Inoperable	1/26/2019	L3		Water pressure low.
Unit: 1504					
Health & Safety	Emergency Fire Exits - Emergency/Fire Exits Blocked/Unusable	7/12/2019	L3		Blocked egress.
HVAC System	Not Operable	7/11/2019	L3		A/C not working.
Kitchen	Dishwasher/Garbage Disposal - Inoperable		L2		Disposal not working.
Building: Bldg 16					
Unit: 1605 vacant					
Bathroom	Ventilation/Exhaust System - Inoperable	7/21/2019	L2		Master bathroom fan has loud noise.
Doors	Damaged Surface (Holes/Paint/Rusting)	7/21/2019	L3		NIS Repair back door.
Kitchen	Dishwasher/Garbage Disposal - Inoperable	7/21/2019	L2		Disposal not working.
Lighting	Missing/Inoperable Fixture	7/21/2019	L3		Kitchen light not working.
Building: Bldg 17					
Unit: 1704					
Floors	Soft Floor Covering Missing/Damaged	10/3/2019	L1		Damaged carpet.
Health & Safety	Hazards - Sharp Edges	10/3/2019	L3		Hazard sharp edges floor.
Kitchen	Refrigerator-Missing/Damaged/Inoperable	7/21/2019	L1		Seal damaged. door brackets missing.
Smoke Detector	Missing/Inoperable	7/11/2019	L3		Smoke detector damaged. Smoke detector not working in hallway.
Walls	Damaged		L3		NIS Repair in hallway

Inspectable Area	Inspectable Item	Deficiency		1	2	3	Comments
Building: Bldg 18	Unit: 1803	Windows	Inoperable/Not Lockable	7/11/2019	L1		Bedroom window not working properly.
		Bathroom	Shower/Tub - Damaged/Missing	10/15/2019	L1		Tub needs resurfacing.
		Kitchen	Cabinets - Missing/Damaged	7/11/2019		L2	Caulking missing around cabinet backing.
		Kitchen	Dishwasher/Garbage Disposal - Inoperable			L2	NIS repair dishwasher.
		Walls	Damaged	7/12/2019		L3	Wall damaged between closet and cabinet. NIS repair behind toilet. NIS repair by mirror.
Building: Bldg 19	Unit:	Building Exterior					
		Roofs	Missing/Damaged Components from	7/17/2019	L1		Splashblock missing by laundry room.
		Downspout/Gutter					
Unit: 1902 sub w/1904		Bathroom	Ventilation/Exhaust System - Inoperable	7/12/2019		L2	Exhaust fan not working in the bathroom.
		Bathroom	Shower/Tub - Damaged/Missing	7/21/2019	L1		Tub needs resurfacing.
		Doors	Missing Door	7/12/2019	L1		Closet doors missing.
		Doors	Damaged Surface (Holes/Paint/Rusting)	7/12/2019		L3	NIS repair bedroom door.
		Health & Safety	Emergency Fire Exits - Emergency/Fire Exits			L3	Blocked egress.
			Blocked/Unusable	7/12/2019			
		Kitchen	Range/Stove - Missing/Damaged/Inoperable			L3	3 out of 4 burners not working.
		Kitchen	Refrigerator-Missing/Damaged/Inoperable		L1		Seal damaged.
Unit: 1908 vacant		Doors	Missing Door	7/21/2019	L1		Closet doors missing.
		Kitchen	Refrigerator-Missing/Damaged/Inoperable	7/12/2019		L3	Refrigerator missing.
		Kitchen	Range/Stove - Missing/Damaged/Inoperable	7/12/2019		L3	Stove not working.
Building: Bldg 2	Unit:	Building Systems					
		Fire Protection	Missing/Damaged/Expired Extinguishers	7/17/2019	L1		Fire extinguisher missing.
Unit: 201 vacant		Health & Safety	Infestation - Insects	7/29/2019		L3	Roaches
Unit: 210 sub w/211		Ceiling	Bulging/Buckling			L3	NIS Repair
		Electrical	GFI Inoperable	7/12/2019		L3	Kitchen GFI not working.
		Health & Safety	Infestation - Insects	7/29/2019		L3	Roaches
		Kitchen	Refrigerator-Missing/Damaged/Inoperable	7/12/2019	L1		Seal damaged.
		Kitchen	Range/Stove - Missing/Damaged/Inoperable	7/12/2019		L2	Right front burner not working.
Building: Bldg 3	Unit: 302	Ceiling	Bulging/Buckling	7/22/2019		L3	Damaged ceiling at entry door.
		Doors	Damaged Hardware/Locks	7/23/2019	L1		Bedroom 2 closet doorknob missing.
		Floors	Soft Floor Covering Missing/Damaged	10/3/2019		L3	Carpet stains 70%.
		Health & Safety	Emergency Fire Exits - Emergency/Fire Exits	7/18/2019		L3	Blocked egress/bedroom 2 caulked window inoperable.
			Blocked/Unusable				
		Kitchen	Dishwasher/Garbage Disposal - Inoperable	7/18/2019		L2	Dishwasher missing.
		Kitchen	Refrigerator-Missing/Damaged/Inoperable	7/18/2019	L1		Seal damaged. Door bracket missing.
		Windows	Cracked/Broken/Missing Panes	7/10/2019	L1		Bedroom 2 bedroom window cracked.
		Windows	Inoperable/Not Lockable	7/18/2019	L1		Bedroom 1 window not locking.
Building: Bldg 4	Unit: 404 vacant	Bathroom	Lavatory Sink - Damaged/Missing	7/26/2019	L1		Bathroom sink damaged.
		Doors	Damaged Hardware/Locks			L3	Top deadbolt at entry door missing. All doorknobs missing.
		Floors	Hard Floor Covering Missing/Damaged	7/26/2019		L2	Bathroom flooring damaged.
			Flooring/Tiles				
		Health & Safety	Infestation - Insects	7/26/2019		L3	Roaches.
		HVAC System	Not Operable	7/18/2019		L3	Not working.
		Kitchen	Refrigerator-Missing/Damaged/Inoperable	7/26/2019		L3	Not working.
		Kitchen	Range/Stove - Missing/Damaged/Inoperable	7/26/2019		L2	Rear left burner inoperable.
		Outlets/Switches	Missing/Broken Cover Plates	7/26/2019		L3	Outlet and switch covers missing/exposed wires.

Inspectable Area	Deficiency				Comments
Inspectable Item					
Building: Bldg 5	Walls	Bulging/Buckling	7/26/2019		L3 NIS by closet on wall.
Unit:					
Building Systems	Fire Protection	Missing/Damaged/Expired Extinguishers	7/17/2019	L1	Fire extinguisher missing.
Building Exterior	Roofs	Missing/Damaged Components from Downspout/Gutter	7/17/2019	L1	Elbow missing by building 4.
Unit: 512 vacant	Windows	Cracked/Broken/Missing/Cracked Panes	7/19/2019	L1	Broken window facing boiler room.
	Ceiling	Bulging/Buckling			L3 Damaged in bedrooms.
	Health & Safety	Infestation - Insects	7/29/2019		L3 Roaches.
Unit: 523	Windows	Missing/Deteriorated Caulking/Seals/Glazing Compound	7/18/2019		L3 Water seeps in when raining.
Unit: 534	Bathroom	Cabinets - Damaged/Missing		L1	Cabinet flooring damaged.
	Bathroom	Shower/Tub - Damaged/Missing			L3 NIS at tub.
	Bathroom	Plumbing - Leaking Faucet/Pipes	7/22/2019	L1	Faucet damaged.
	Ceiling	Mold/Mildew/Water Stains/Water Damage	7/23/2019	L1	Hallway ceiling damaged.
	Floors	Hard Floor Covering Missing/Damaged Flooring/Tiles	10/3/2019	L2	Kitchen floor damaged.
	Health & Safety	Infestation - Insects	7/29/2019		L3 Roaches.
	HVAC System	Noisy/Vibrating/Leaking	7/25/2019	L1	A/C leaking.
	Kitchen	Plumbing - Leaking Faucet/Pipes	7/23/2019	L1	Faucet leaking.
	Kitchen	Refrigerator-Missing/Damaged/Inoperable	7/23/2019	L1	Seal damaged.
	Kitchen	Range Hoods/Exhaust Fans -Excessive Grease/Inoperable	7/23/2019	L1	Exhaust fan has loud noise.
Unit: 540	Bathroom	Shower/Tub - Damaged/Missing	7/12/2019	L1	Tub stopper missing.
	Bathroom	Lavatory Sink - Damaged/Missing	7/12/2019	L1	Sink stopper missing.
	Floors	Soft Floor Covering Missing/Damaged		L1	Damaged carpet at entrance.
	Health & Safety	Infestation - Insects	7/29/2019		L3 Roaches.
	HVAC System	Not Operable	7/11/2019		L3 Not cooling.
	Kitchen	Refrigerator-Missing/Damaged/Inoperable	7/12/2019		L3 Inoperable.
	Smoke Detector	Missing/Inoperable	7/12/2019		L3 Smoke detector missing in bedroom.
Building: Bldg 6					
Unit: 603	Bathroom	Lavatory Sink - Damaged/Missing	7/15/2019	L1	Sink stopper damaged.
	Health & Safety	Infestation - Insects	7/15/2019		L3 Roaches.
	Kitchen	Range/Stove - Missing/Damaged/Inoperable	7/15/2019	L1	Stove oven door handle missing.
	Kitchen	Refrigerator-Missing/Damaged/Inoperable	7/15/2019	L1	Seal damaged.
Unit: 613	Bathroom	Shower/Tub - Damaged/Missing		L1	Tub resurfacing needed.
	Doors	Missing Door	7/15/2019	L1	Closet door missing.
	Doors	Damaged Frames/Threshold/Lintels/Trim	7/15/2019	L2	Back door threshold.
	Health & Safety	Infestation - Insects	7/15/2019		L3 Roaches.
	Kitchen	Countertops - Missing/Damaged	7/15/2019	L2	Damaged backboard behind kitchen sink.
	Kitchen	Range/Stove - Missing/Damaged/Inoperable	7/15/2019	L3	Stove inoperable.
	Lighting	Missing/Inoperable Fixture	7/15/2019		L3 Kitchen light not working.
	Walls	Damaged	7/15/2019	L1	Holes in wall in living room by kitchen. Wall damaged behind toilet. Hole in wall by window in bedroom.
Building: Bldg 7					
Unit: 711 sub w/707	Ceiling	Mold/Mildew/Water Stains/Water Damage	7/26/2019	L1	Ceiling damaged above tub.
	Floors	Hard Floor Covering Missing/Damaged Flooring/Tiles	9/24/2019	L2	Kitchen floor damaged.
	Health & Safety	Infestation - Insects	7/26/2019		L3 Roaches.
	HVAC System	Not Operable	7/24/2019		L3 A/C not cooling.
Unit: 719	Bathroom	Shower/Tub - Damaged/Missing	10/15/2019	L1	Need caulking at tub. Need tub resurfacing.

Inspectable Area	Deficiency			Comments
Inspectable Item				
Bathroom	Lavatory Sink - Damaged/Missing 7/23/2019		L3	Sink cracked.
Floors	Soft Floor Covering Missing/Damaged	L1		Carpet damaged by kitchen.
Health & Safety	Infestation - Insects 7/12/2019		L3	Roaches.
Health & Safety	Emergency Fire Exits - Emergency/Fire Exits 7/26/2019 Blocked/Unusable		L3	Blocked egress in bedroom.
Kitchen	Cabinets - Missing/Damaged		L2	Kitchen cabinet drawer facing broken.
Kitchen	Dishwasher/Garbage Disposal - Inoperable 7/23/2019		L2	Disposal not working.
Kitchen	Range/Stove - Missing/Damaged/Inoperable		L3	Front and rear burners on left side not working.
Kitchen	Plumbing - Leaking Faucet/Pipes	L1		Faucet corroded.
Walls	Damaged 10/15/2019	L1		tiles missing at tub by faucet.
Building: Bldg 9				
Unit: 913				
Bathroom	Lavatory Sink - Damaged/Missing 7/23/2019	L1		Sink stopper missing.
Doors	Damaged Hardware/Locks		L3	Bathroom door not locking.
HVAC System	Not Operable 7/16/2019		L3	Not working.
Kitchen	Range Hoods/Exhaust Fans -Excessive Grease/Inoperable		L3	Exhaust fan filter missing.
Kitchen	Countertops - Missing/Damaged		L2	Need caulking behind kitchen sink.
Walls	Damaged		L3	NIS repair by dining table.

Exhibit 2:

Texas Administrative Code

TITLE 10 COMMUNITY DEVELOPMENT
PART 1 TEXAS DEPARTMENT OF HOUSING AND COMMUNITY AFFAIRS
CHAPTER 10 UNIFORM MULTIFAMILY RULES
SUBCHAPTER E POST AWARD AND ASSET MANAGEMENT REQUIREMENTS
RULE §10.406 Ownership Transfers (§2306.6713)

(a) Ownership Transfer Notification. All multifamily Development Owners must provide written notice and a completed Ownership Transfer packet, if applicable, to the Department at least 45 calendar days prior to any sale, transfer, or exchange of the Development or any portion of or Controlling interest in the Development. Except as otherwise provided herein, the Executive Director's prior written approval of any such transfer is required. The Executive Director may not unreasonably withhold approval of the transfer requested in compliance with this section.

(b) Exceptions. The following exceptions to the ownership transfer process outlined herein apply:

(1) A Development Owner shall be required to notify the Department but shall not be required to obtain Executive Director approval when the transferee is an Affiliate of the Development Owner with no new Principals or the transferee is a Related Party who does not Control the Development and the transfer is being made for estate planning purposes.

(2) Transfers that are the result of an involuntary removal of the general partner by the investment limited partner do not require advance approval but must be reported to the Department as soon as possible due to the sensitive timing and nature of this decision. In the event the investment limited partner has proposed a new general partner or will permanently replace the general partner, a full Ownership Transfer packet must be submitted.

(3) Changes to the investment limited partner, non-Controlling limited partner, or other non-Controlling partners affiliated with the investment limited partner do not require Executive Director approval. A General Partner's acquisition of the interest of the investment limited partner does not require Executive Director approval, unless some other change in ownership is occurring as part of the same overall transaction.

(4) Changes resulting from foreclosure do not require advance approval but acquiring parties must notify the Department as soon as possible of the revised ownership structure and ownership contact information.

(c) General Requirements.

(1) Any new Principal in the ownership of a Development must be eligible under §11.202 of Subchapter C (relating to Ineligible Applicants and Applications). In addition, Principals will be reviewed in accordance with Chapter 1, Subchapter C of this title (relating to Previous Participation and Executive Award Review and Advisory Committee).

(2) Changes in Developers or Guarantors must be addressed as non-material amendments to the application under §10.405 of this subchapter.

(3) To the extent an investment limited partner or its Affiliate assumes a Controlling interest in a Development Owner, such acquisition shall be subject to the Ownership Transfer requirements set forth herein. Principals of the investment limited partner or Affiliate will be considered new Principals and will be reviewed as stated under paragraph (1) of this subsection.

(4) Simultaneous transfer or concurrent offering for sale of the General Partner's and Limited Partner's control and interest will be subject to the Ownership Transfer requirements set forth herein and will trigger a Right of First Refusal, if applicable.

(d) Transfer Actions Warranting Debarment. If the Department determines that the transfer, involuntary removal, or replacement was due to a default by the General Partner under the Limited Partnership Agreement, or other detrimental action that put the Development at risk of failure or the Department at risk for financial exposure as a result of non-compliance, staff may make a recommendation to the Board for the

debarment of the entity and/or its Principals and Affiliates pursuant to the Department's debarment rule. In addition, a record of transfer involving Principals in new proposed awards will be reported and may be taken into consideration by the Executive Award and Review Committee, in accordance with Chapter 1, Subchapter C of this title (relating to Previous Participation and Executive Award Review and Advisory Committee), prior to recommending any new financing or allocation of credits.

(e) Transfers Prior to 8609 Issuance or Construction Completion. Prior to the issuance of IRS Form(s) 8609 (for Housing Tax Credits) or the completion of construction (for all Developments funded through other Department programs) an Applicant may request an amendment to its ownership structure to add Principals. The party(ies) reflected in the Application as having Control must remain in the ownership structure and retain Control, unless approved otherwise by the Executive Director. A development sponsor, General Partner or Development Owner may not sell the Development in whole or voluntarily end their Control prior to the issuance of 8609s.

(f) Nonprofit Organizations. If the ownership transfer request is to replace a nonprofit organization within the Development ownership entity, the replacement nonprofit entity must adhere to the requirements in paragraph (1) or (2) of this subsection.

(1) If the LURA requires ownership or material participation in ownership by a Qualified Nonprofit Organization, and the Development received Tax Credits pursuant to §42(h)(5) of the Code, the transferee must be a Qualified Nonprofit Organization that meets the requirements of §42(h)(5) of the Code and Tex. Gov't Code §2306.6706, if applicable, and can demonstrate planned participation in the operation of the Development on a regular, continuous, and substantial basis.

(2) If the LURA requires ownership or material participation in ownership by a nonprofit organization or CHDO, the Development Owner must show that the transferee is a nonprofit organization or CHDO, as applicable, that complies with the LURA.

(3) Exceptions to the above may be made on a case by case basis if the Development is past its Compliance Period/Federal Affordability Period, was not reported to the IRS as part of the Department's Nonprofit Set Aside in any HTC Award year, and follows the procedures outlined in §10.405(b)(1) - (5) of this chapter (relating to LURA Amendments that require Board Approval). The Board must find that:

(A) The selling nonprofit is acting of its own volition or is being removed as the result of a default under the organizational documents of the Development Owner;

(B) The participation by the nonprofit was substantive and meaningful during the full term of the Compliance Period but is no longer substantive or meaningful to the operations of the Development; and

(C) The proposed purchaser is an affiliate of the current Owner or otherwise meets the Department's standards for ownership transfers.

(g) Historically Underutilized Business (HUB) Organizations. If a HUB is the general partner or special limited partner of a Development Owner and it determines to sell its ownership interest, after the issuance of 8609's, the purchaser of that partnership interest or the general or special limited partner is not required to be a HUB as long as the procedure described in §10.405(b)(1) of this chapter (relating to Non-Material LURA Amendments) has been followed and approved.

(h) Documentation Required. A Development Owner must submit documentation requested by the Department to enable the Department to understand fully the facts and circumstances pertaining to the transfer and the effects of approval or denial. Documentation must be submitted as directed in the Post Award Activities Manual, which includes but is not limited to:

(1) A written explanation outlining the reason for the request;

(2) Ownership transfer information, including but not limited to the type of sale, amount of Development reserves to transfer in the event of a property sale, and the prospective closing date;

(3) Pre and post transfer organizational charts with TINs of each organization down to the level of natural persons in the ownership structure as described in §11.204(13)(A) of Subchapter C;

(4) A list of the names and contact information for transferees and Related Parties;

(5) Previous Participation information for any new Principal as described in §11.204(13)(B) of Subchapter C;

(6) Agreements among parties associated with the transfer;

(7) Owners Certifications with regard to materials submitted further described in the Post Award Activities Manual;

(8) Detailed information describing the organizational structure, experience, and financial capacity of any party holding a controlling interest in any Principal or Controlling entity of the prospective Development Owner;

(9) Evidence and certification that the tenants in the Development have been notified in writing of the proposed transfer at least 30 calendar days prior to the date the transfer is approved by the Department. The ownership transfer approval letter will not be issued until this 30 day period has expired;

(10) Any required exhibits and the list of exhibits related to specific circumstances of transfer or Ownership as detailed in the Post Award Activities Manual.

(i) Once the Department receives all necessary information under this section and as required under the Post Award Activities Manual, staff shall initiate a qualifications review of a transferee, in accordance with Chapter 1, Subchapter C of this title (relating to Previous Participation and Executive Award Review and Advisory Committee), to determine the transferee's past compliance with all aspects of the Department's programs, LURAs and eligibility under this chapter and §11.202 of Subchapter C (relating to Ineligible Applicants and Applications).

(j) Credit Limitation. As it relates to the Housing Tax Credit amount further described in §11.4(a) of this title (relating to Tax Credit Request and Award Limits), the credit amount will not be applied in circumstances described in paragraphs (1) and (2) of this subsection:

(1) In cases of transfers in which the syndicator, investor or limited partner is taking over ownership of the Development and not merely replacing the general partner; or

(2) In cases where the general partner is being replaced if the award of credits was made at least five years prior to the transfer request date.

(k) Penalties, Past Due Fees and Underfunded Reserves. The Development Owner must comply with any additional documentation requirements as stated in Subchapter F of this chapter (relating to Compliance Monitoring). The Development Owner, as on record with the Department, will be liable for any penalties or fees imposed by the Department even if such penalty can be attributable to the new Development Owner unless such ownership transfer is approved by the Department. In the event a transferring Development has a history of uncorrected UPCS violations, ongoing issues related to keeping housing sanitary, safe, and decent, an account balance below the annual reserve deposit amount as specified in §10.404(a) (relating to Replacement Reserve Accounts), or that appears insufficient to meet capital expenditure needs as indicated by the number or cost of repairs included in a PCA, the prospective Development Owner may be required to establish and maintain a replacement reserve account or increase the amount of regular deposits to the replacement reserve account by entering into a Reserve Agreement with the Department. The Department may also request a plan and timeline relating to needed repairs or renovations that will be completed by the departing and/or incoming Owner as a condition to approving the Transfer.

(l) Ownership Transfer Processing Fee. The ownership transfer request must be accompanied by the corresponding ownership transfer fee as outlined in §11.901 of this chapter (relating to Fee Schedule, Appeals, and other Provisions).

Source Note: The provisions of this §10.406 adopted to be effective January 5, 2017, 41 TexReg 10569; amended to be effective January 4, 2018, 42 TexReg 7610; amended to be effective December 30, 2018, 43 TexReg 8297

1f

BOARD ACTION REQUEST
MULTIFAMILY FINANCE DIVISION
MAY 21, 2020

Presentation, discussion, and possible action regarding the issuance of Determination Notices for 4% Housing Tax Credit Applications

RECOMMENDED ACTION

WHEREAS, six applications, as further detailed below, were submitted to the Department for consideration of a Determination Notice of 4% Housing Tax Credits;

WHEREAS, the Executive Award and Review Advisory Committee (EARAC) considered the program requirements, underwriting requirements and compliance history associated with each application listed herein; and

WHEREAS, EARAC recommends each of the six applications for an award of 4% Housing Tax Credits, in the specific amounts noted herein, and subject to any underwriting conditions as noted in the Real Estate Analysis Report and any compliance conditions as reflected in Exhibit A, as applicable;

NOW, therefore, it is hereby

RESOLVED, that the issuance of Determination Notices in the respective amounts for each of the applications listed herein, subject to underwriting conditions as found in the Real Estate Analysis report posted to the Department's website, and subject to any EARAC conditions as reflected in Exhibit A, is hereby approved in the form presented at this meeting; and

FURTHER RESOLVED, that provided the Applicant has not closed on the bond financing for Mira Vista Apartments on or before September 18, 2020, the Board authorizes the Executive Director, with a positive EARAC recommendation or an EARAC recommendation with conditions, to approve or with a negative EARAC recommendation to deny an extension of the Determination Notice.

BACKGROUND

The 4% Housing Tax Credit (HTC) program is considered a non-competitive program in that there is not a specific ceiling amount of HTCs that can be issued each year. Rather, the ceiling amount of HTCs to be issued is limited by the amount of Private Activity Bond volume cap available. The Texas Bond Review Board (BRB) administers the Private Activity Bond program for the State of Texas, and for the 2020 calendar year, the state received approximately \$3 billion in Private Activity Bond authority, of which

approximately \$800 million is reserved for multifamily housing until August 15th of each year. After such date, there may be more Private Activity Bond volume cap that goes towards multifamily housing.

Individual projects receive a Certification of Reservation (Reservation) from the BRB that allows for a statutory 180-day closing timeline. For those projects seeking 4% HTCs (as the majority of them do), they must complete the Department's review process, the bond issuer's process, and the Attorney General's process in order to close within the prescribed timeframe. The Department accepts applications on a monthly basis throughout the year. The year from which the Reservation is issued is what determines the QAP to which the application must adhere. Included in this Board presentation as Exhibit B is a list of the 4% HTC applications staff has processed thus far for 2020. The list reflects all applications received and includes a column that denotes the applications' status, specifically, those that have already closed, have been approved by the Board, are active and currently under review and those that are pre-applications that will utilize the Department as the bond issuer and an HTC application will be forthcoming. Worth noting is that the majority of the applications noted as active, including many that have already been approved, are those applications that participated in the 2020 Private Activity Bond Lottery which illustrates the demand for Private Activity Bond volume cap so early in the program year.

The Reservations from the BRB for the developments described herein were issued under the Priority 3 designation unless noted otherwise, which does not have a prescribed restriction on the percentage of Area Median Family Income (AMFI) that must be served (beyond the federal requirement). The AMFI levels proposed to be served for each of the projects are indicated in their respective summaries, below.

20405 Gala at Fate

Gala at Fate is a proposed new construction development to serve the elderly population (elderly limitation) with 185 units to be located at the east end of Black Oak Lane in Fate, Rockwall County. The development originally received its Reservation as part of the BRB Private Activity Bond 2020 Lottery; however, the applicant applied for a new Reservation, issued March 3, 2020, to ensure additional time for the bond financing to close before the deadline. The application reflected an intent to elect the income averaging set-aside. The Development will include 12 units to be rent and income restricted at 30% of AMFI, 137 units to be rent and income restricted at 60% of AMFI, and the remaining 36 units to be rent and income restricted at 70% of AMFI. The North Central Texas Housing Finance Corporation is serving as the bond issuer.

Recommended HTC Amount: \$1,166,285

20410 Trader Flats

Trader Flats proposes the new construction of 324 units for the general population, to be located at 8671 Southwest Loop 410 in San Antonio, Bexar County. The development received the Reservation as part of the BRB Private Activity Bond 2020 Lottery. The application reflected an intent to elect the income averaging set-aside and proposes 33 units that will be rent and income restricted at 30% of AMFI, 224

units will be rent and income restricted at 60% of AMFI, and 67 units will be rent and income restricted at 70% of AMFI. The Las Varas Public Facility Corporation is serving as the bond issuer.

Recommended HTC Amount: \$1,863,629

20412 1604 Lofts

1604 Lofts proposes the new construction of 324 units for the general population, to be located at the northwest corner of 1604 Loop East and Weichold Road, in San Antonio, Bexar County. The development received the Reservation as part of the BRB Private Activity Bond 2020 Lottery. The application reflected an intent to elect the income averaging set-aside and proposes 33 units that will be rent and income restricted at 30% of AMFI, 224 units will be rent and income restricted at 60% of AMFI, and 67 units will be rent and income restricted at 70% of AMFI. The Las Varas Public Facility Corporation is serving as the bond issuer.

Recommended HTC Amount: \$1,895,702

20413 Residences at Merritt Hill

The Residences at Merritt Hill is a new construction development proposed to be located southeast of the intersection of Merritt Road and the President George Bush Turnpike in Rowlett, Dallas County. All of the 260 units in the development will be rent and income restricted at 60% of AMFI and the general population will be served. The Rowlett Housing Finance Corporation is serving as the bond issuer.

Recommended HTC Amount: \$1,888,671

20447 Franklin Park

Franklin Park Apartments proposes the acquisition and rehabilitation of 163 units to be located at 4509 East St. Elmo Road in Austin, Travis County. Rehabilitation costs are approximately \$32k per unit for the development. The apartments were built in 2003 - 2004 and received an award of competitive Housing Tax Credits on December 31, 2002. The project is proposed to continue to serve the general population; however, the proposed AMFI households served differs from the LURA currently in place, as noted in the table below, and the application reflected an intent to elect income averaging associated with the new award. Staff notes that, while this is acceptable, the applicant must also continue to follow the current low-income unit restrictions until the term of the original LURA ends on December 31, 2059.

	Current Unit Restrictions	Proposed Unit Restrictions
30% AMI	26 units	26 units
40% AMI	52 units	53 units
50% AMI	52 units	52 units

80% AMI	0 units	32 units
Market Rate	33 units	0 units

Austin Affordable PFC, Inc. is serving as the bond issuer. There is a Neighborhood Risk Factor, relating to the middle school in the attendance zone, associated with the Franklin Park development and is further discussed below.

School: Consuelo Mendez Middle School (Mendez) is the middle school in the attendance zone of the development and was rated Improvement Required for 2018. Mendez has had an Improvement Required rating by TEA from 2014 – 2018, and most recently received a 2019 Accountability Rating of F. Pursuant to 10 TAC §11.101(a)(3), a school that has been Improvement Required for three consecutive years shall be unable to mitigate unless there is a clear trend indicating imminent compliance, due to the potential for school closure as an administrative remedy pursuant to Chapter 39 of the Texas Education Code.

At the Board meeting of November 7, 2019, the 2020 QAP was adopted that reflected a change in Department policy as it relates to existing properties in the Department’s portfolio. Specifically, the 2020 QAP provides that such properties are exempt from the ineligibility requirement relating to school quality. As previously noted, Franklin Park is a restricted property in the Department’s portfolio.

Recommended HTC Amount: \$737,361

20450 Mira Vista Apartments

Mira Vista Apartments proposes the new construction of 312 units to be located at 1226 Mira Vista Road in San Antonio, Bexar County. All of the units will be rent and income restricted at 60% of AMFI and will serve the general population. Las Varas Public Facility Corporation will serve as the bond issuer. In lieu of a Reservation, a Carryforward Designation Certificate BRB January 3, 2020, and will expire on December 31, 2022. Given the length of time to close under this type of reservation, EARAC recommends a condition be placed on the award that closing take place no later than September 18, 2020 which is a more typical closing timeline under which traditional Reservations would have to close. If closing has not occurred by this date, the Executive Director, with a positive EARAC recommendation or an EARAC recommendation with conditions, to approve or with a negative EARAC recommendation to deny an extension of the Determination Notice.

Recommended HTC Amount: \$1,783,385

EXHIBIT A
Previous Participation Results

Application Number	Development Name	Category	PPR Conditions
20405	Gala at Fate	1	N/A
20410	Trader Flats	2	N/A
20412	1604 Lofts	2	N/A
20413	Residences at Merritt Hill	2	N/A
20447	Franklin Park	2	N/A
20450	Mira Vista	2	N/A



4% (Non-Competitive) Housing Tax Credit Program 2020 Application Status Log

TDHCA #	Previous TDHCA #	Development Name	Development City	Board Meeting Date (MM/DD/YYYY)	Application Status	Total Units	Total Low-Income Units	Bond Reservation Amount	Requested HTC Amount	Recommend HTC Amount
20451	19440	Ventura at Parmer Lane	Austin ETJ	10/10/2019	Closed	216	216	\$ 34,000,000	\$ 2,189,841	\$ 2,189,841
20460	18423; 19400	Villas del San Xavier	San Marcos	12/12/2019	Approved	156	156	\$ 25,000,000	\$ 1,059,750	\$ 1,059,750
TBD	19428	Riverstone	San Marcos	11/7/2019	Approved	336	336	\$ 50,000,000	\$ 2,349,942	\$ 2,349,942
TBD	19438	Legacy Senior	Round Rock	11/7/2019	Approved	157	157	\$ 20,000,000	\$ 732,029	\$ 732,029
TBD	18456; 19470	Jackie Robinson Apartments	El Paso	12/12/2019	Approved	186	186	\$ 30,000,000	\$ 1,290,195	\$ 1,290,195
20429	19452	Las Palmas	La Feria	1/16/2020	Approved	36	35	\$39,120,000 (portfolio)	\$ 87,983	\$ 87,983
20422	19445	Brush Country Cottages	Dilley	1/16/2020	Approved	28	28	-	\$ 89,069	\$ 89,069
20423	19446	Chula Vista	San Diego	1/16/2020	Approved	44	44	-	\$ 149,982	\$ 149,982
20424	19447	Cielo Lindo	Edcouch	1/16/2020	Approved	34	34	-	\$ 101,022	\$ 101,022
20425	19448	La Estancia	Sebastian	1/16/2020	Approved	32	32	-	\$ 101,210	\$ 101,210
20426	19449	La Posada I & II	Ela	1/16/2020	Approved	74	74	-	\$ 208,076	\$ 208,076
20427	19450	La Reina	La Villa	1/16/2020	Approved	30	30	-	\$ 65,586	\$ 65,586
20428	19451	La Sombra	Donna	1/16/2020	Approved	50	50	-	\$ 118,354	\$ 118,354
20430	19453	Leuty Avenue	Justin	1/16/2020	Approved	24	24	-	\$ 80,261	\$ 80,261
20431	19454	Los Laureles	Edcouch	1/16/2020	Approved	23	23	-	\$ 88,153	\$ 88,153
20432	19455	Los Naranjos	Alton	1/16/2020	Approved	30	30	-	\$ 67,810	\$ 67,810
20433	19456	Oak Haven	Donna	1/16/2020	Approved	24	24	-	\$ 63,090	\$ 63,090
20434	19457	Raintree	Alamo	1/16/2020	Approved	32	32	-	\$ 82,925	\$ 82,925
20435	19458	Seagraves Gardens	Seagraves	1/16/2020	Approved	32	32	-	\$ 91,709	\$ 91,709
20436	19459	Silver Trail	Menard	1/16/2020	Approved	24	24	-	\$ 67,091	\$ 67,091
20437	19460	The Village	Tomball	1/16/2020	Approved	64	64	-	\$ 172,768	\$ 172,768
20438	19461	Valley View	Valley View	1/16/2020	Approved	24	24	-	\$ 78,834	\$ 78,834
20439	19462	Villa Vallarta	Rio Grande City	1/16/2020	Approved	40	40	-	\$ 122,529	\$ 122,529
20440	19463	Vista Verde	Cotulla	1/16/2020	Approved	24	24	-	\$ 82,514	\$ 82,514
20441	19464	Willowick	Gainesville	1/16/2020	Approved	60	60	-	\$ 171,018	\$ 171,018
20442	19465	Windmill	Giddings	1/16/2020	Approved	28	28	-	\$ 77,926	\$ 77,926
20443	19466	Windwood I & II	Kingsland	1/16/2020	Approved	68	68	-	\$ 151,618	\$ 151,618
20407		New Hope Housing Avenue J	Houston	2/20/2020	Approved	100	100	\$ 23,000,000	\$ 1,290,647	\$ 1,290,467
20448	18458; 19431	Scharbauer Flats	Midland	2/20/2020	Approved	300	300	\$ 40,000,000	\$ 2,895,615	\$ 2,895,615
20421	19442	Richcrest Apartments	Houston	3/26/2020	Approved	288	286	\$ 30,000,000	\$ 1,974,441	\$ 1,974,441
20414		The Arbor at Wayforest	Houston	3/26/2020	Approved	192	192	\$ 20,000,000	\$ 1,262,807	\$ 1,262,807
20404		Tampico Apartments	San Antonio	3/26/2020	Approved	200	136	\$ 23,000,000	\$ 739,670	\$ 739,670
20409		Mckinney Flats	McKinney	3/26/2020	Approved	205	205	\$ 32,000,000	\$ 1,393,849	\$ 1,393,849
20418		Park at 38 Thirty	San Antonio	3/26/2020	Approved	196	196	\$ 25,000,000	\$ 1,027,837	\$ 1,027,837
20605	19608	Reserve at San Marcos	San Marcos	3/26/2020	Approved	376	320	\$ 41,000,000	\$ 1,857,733	\$ 1,857,733
20446	19432	St. Johns Square	San Antonio	3/26/2020	Approved	252	54	\$ 50,000,000	\$ 473,449	\$ 449,524
20401		Palladium Port Aransas	Port Aransas	4/23/2020	Approved	183	165	\$ 19,000,000	\$ 1,155,074	\$ 1,155,074
20600		Oaks on Clark	San Antonio	4/23/2020	Approved	80	80	\$ 12,000,000	\$ 607,290	\$ 597,284
20601	19611	Granada Terrace Apartments	Houston	4/23/2020	Approved	156	156	\$ 12,000,000	\$ 882,061	\$ 882,061
20449	19469	EMLI at Pecan Creek	Aubrey	4/23/2020	Approved	254	254	\$ 20,000,000	\$ 1,484,333	\$ 1,484,333
20408		Vi Collina	Austin	4/23/2020	Approved	170	170	\$ 24,000,000	\$ 1,340,220	\$ 1,340,220
20420		Pan American	San Antonio	4/23/2020	Approved	100	100	\$ 15,000,000	\$ 674,355	\$ 674,355
20447	19472	Franklin Park	Austin	5/21/2020	Active	163	163	\$ 15,000,000	\$ 737,361	\$ 737,361
20611	20402	333 Holly	The Woodlands	5/21/2020	Active	332	332	\$ 36,800,000	\$ 2,484,301	\$ 2,484,301
20612	20403	The Pines	The Woodlands	5/21/2020	Active	152	152	\$ 22,000,000	\$ 1,469,273	\$ 1,469,273
20413		Residences at Merritt Hill	Rowlett	5/21/2020	Active	260	260	\$ 33,000,000	\$ 1,888,671	\$ 1,888,671
20603	19612	Scott Street Lofts	Houston	5/21/2020	Active	123	98	\$ 18,000,000	\$ 741,693	\$ 711,964
20410		Traders Flats	San Antonio	5/21/2020	Active	324	324	\$ 38,000,000	\$ 1,863,629	\$ 1,863,629
20400		Palladium West Francis	Midland	5/21/2020	Active	240	188	\$ 25,000,000	\$ 1,596,885	\$ 1,596,885
20412		1604 Lofts Apartments	San Antonio	5/21/2020	Active	324	324	\$ 38,000,000	\$ 1,895,702	\$ 1,895,702
20416		The Estates at Owen Tech	Austin	5/21/2020	Active	174	174	\$ 20,000,000	\$ 1,213,610	\$ 1,213,610
20405		Gala at Fate	Fate	5/21/2020	Active	185	185	\$ 25,000,000	\$ 1,166,285	\$ 1,166,285
20604	19468	The Walzem	San Antonio	5/21/2020	Active	200	200	\$ 20,000,000	\$ 1,326,147	\$ 1,280,892
20450		Mira Vista	San Antonio	5/21/2020	Active	312	312	\$ 28,000,000	\$ 1,783,385	\$ 1,783,385
						7,717	7,301	\$ 863,800,000	\$ 47,167,608	\$ 47,058,513
20415		Avenue on 34th Apartments	Houston	6/25/2020	Active	70	56	\$ 8,000,000	\$ 324,609	\$ -
20406		Gala at Central Park Apartments	Hurst	6/25/2020	Active	94	94	\$ 15,000,000	\$ 486,783	\$ -
20606	19610	Fish Pond at Corpus Christi	Corpus Christi	6/25/2020	Active	112	111	\$ 10,000,000	\$ 675,744	\$ -
20444		Plano Kathryn Senior Living	Plano	6/25/2020	Active	252	252	\$ 30,000,000	\$ 1,835,157	\$ -
20452		Enclave at Lake Pointe	Houston	6/25/2020	Active	132	132	\$ 14,200,000	\$ 723,460	\$ -
20419		Woodway Village	Austin	6/25/2020	Active	160	160	\$ 30,000,000	\$ 1,196,513	\$ -
20454		South Terrace	Waco	6/25/2020	Active	250	250	\$ 25,000,000	\$ 1,452,219	\$ -
20455		Redwood	San Marcos	6/25/2020	Active	296	296	\$ 50,000,000	\$ 2,107,712	\$ -
20457		Pinewood Apartments	Houston	6/25/2020	Active	240	240	\$ 30,000,000	\$ 1,174,359	\$ -
20458		Kinwood Apartments	McKinney	6/25/2020	Active	200	200	\$ 30,000,000	\$ 1,245,289	\$ -
20459		Spring Villas	Austin	6/25/2020	Active	304	302	\$ 45,000,000	\$ 2,295,642	\$ -
20461		Cascade at Onion Creek	Austin	6/25/2020	Active	264	264	\$ 35,000,000	\$ 1,427,509	\$ -
20602	03438	The Vermillion	Houston	7/23/2020	Active	260	260	\$ 29,000,000	\$ 1,372,549	\$ -
20463		Trinity Oaks	Sulphur Springs	7/23/2020	Active	48	48	\$ 2,129,000	\$ 497,000	\$ -
20464		Pine Terrace	Mount Pleasant	7/23/2020	Active	76	76	\$ 3,371,000	\$ 210,127	\$ -
20609		Pecan Grove	Seguin	7/23/2020	Active	198	198	\$ 26,000,000	\$ 1,353,160	\$ -

20466	Blue Water Gardens	Hereford	7/23/2020	Active	132	132	\$	16,750,000	\$	730,914	\$	-
20467	Greenline North	San Antonio	7/23/2020	Active	292	292	\$	50,000,000	\$	1,946,883	\$	-
20456	The Hollows	Channelview CDP	7/23/2020	Active	192	192	\$	20,000,000	\$	1,043,287	\$	-
20468	Preserve at the Port	San Antonio	7/23/2020	Active	384	384	\$	37,000,000	\$	1,654,968	\$	-
20471	Northwood	Houston ETJ	7/23/2020	Active	288	288	\$	30,000,000	\$	2,378,498	\$	-
20613	Riverside Senior	Fort Worth	5/21/2020	Pre-Application	264	264		TBD	\$	1,818,482	\$	-
20610	Terrace at Southern Oaks	Dallas	5/21/2020	Pre-Application	300	300		TBD	\$	2,000,114	\$	-
20473	Agave East	Austin ETJ	9/3/2020	Active	240	240	\$	35,000,000	\$	1,355,697	\$	-
20615	The Montage	San Antonio ETJ	6/25/2020	Pre-Application	216	216		TBD	\$	1,454,238	\$	-
					5,264	5,247	\$	571,450,000	\$	32,760,913	\$	-
20417	St. Joe Apartments	Houston	3/19/2020	Withdrawn	307	307	\$	51,757,648	\$	4,596,000	\$	-
20411	Kitty Hawk Flats Apartments	San Antonio	5/21/2020	Withdrawn	239	239	\$	28,000,000	\$	1,482,838	\$	-
					546	546	\$	79,757,648	\$	6,078,838	\$	-
				TOTAL*	12,981	12,548	\$	1,435,250,000	\$	79,928,521	\$	47,058,513

*Totals include Approved, Active and Pre-Application Status

20405 Gala at Fate - Application Summary

PROPERTY IDENTIFICATION	
Application #	20405
Development	Gala at Fate
City / County	Fate / Rockwall
Region/Area	3 / Urban
Population	Elderly Limitation
Set-Aside	General
Activity	New Construction

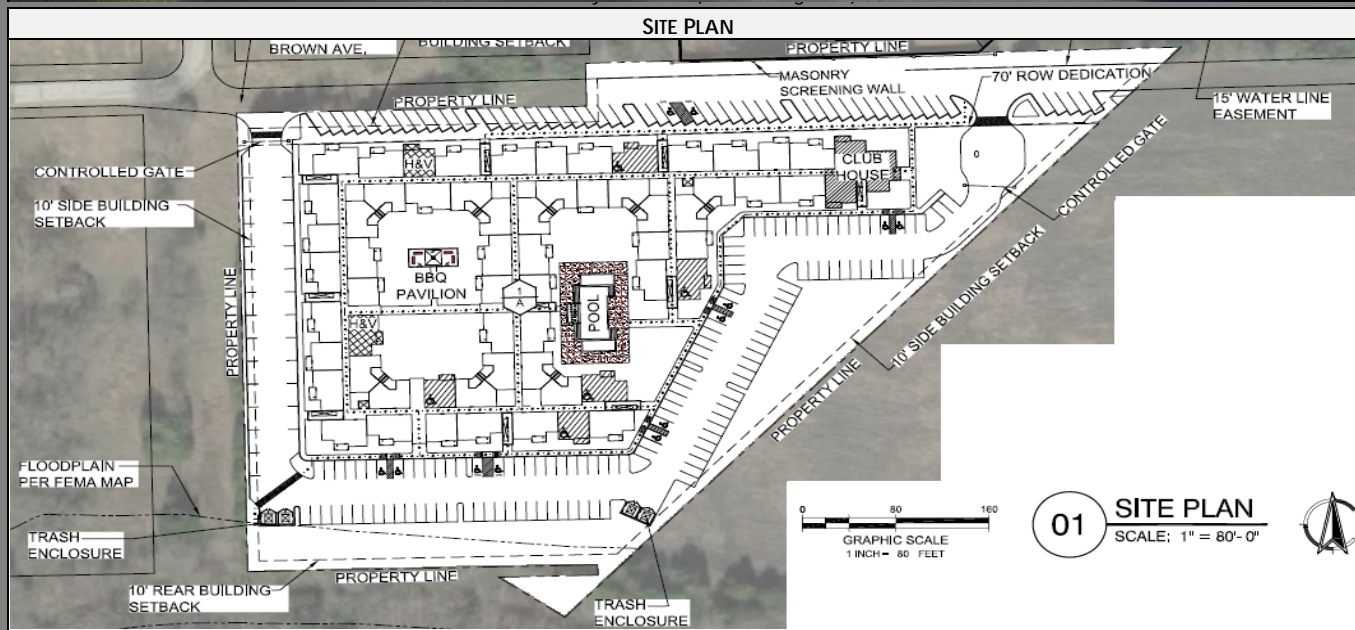
RECOMMENDATION					
TDHCA Program	Request	Recommended			
LIHTC (4% Credit)	\$1,166,285	\$1,166,285	\$6,304/Unit	\$0.91	

KEY PRINCIPAL / SPONSOR		
Michael Gardner / Gardner Capital & Michael Kovacs / Fate Public Facilities Corporation		
Related Parties	Contractor - Yes	Seller - 0



UNIT DISTRIBUTION			INCOME DISTRIBUTION		
# Beds	# Units	% Total	Income	# Units	% Total
Eff	-	0%	30%	12	6%
1	94	51%	40%	-	0%
2	91	49%	60%	137	74%
3	-	0%	70%	36	19%
4	-	0%	MR	-	
TOTAL	185	100%	TOTAL	185	100%

PRO FORMA FEASIBILITY INDICATORS			
Pro Forma Underwritten		Applicant's Pro Forma	
Debt Coverage	1.17	Expense Ratio	35.7%
Breakeven Occ.	83.9%	Breakeven Rent	\$882
Average Rent	\$974	B/E Rent Margin	\$92
Property Taxes	Exempt	Exemption/PILOT	100%
Total Expense	\$3,945/unit	Controllable	\$2,800/unit



MARKET FEASIBILITY INDICATORS			
Gross Capture Rate (10% Maximum)	3.5%		
Highest Unit Capture Rate	13%	2 BR/60%	67
Dominant Unit Cap. Rate	7%	1 BR/60%	70
Premiums (↑60% Rents)	N/A	N/A	
Rent Assisted Units	N/A		

DEVELOPMENT COST SUMMARY			
Costs Underwritten		Applicant's Costs	
Avg. Unit Size	798 SF	Density	33.9/acre
Acquisition		\$06K/unit	\$1,105K
Building Cost	\$98.40/SF	\$79K/unit	\$14,534K
Hard Cost		\$107K/unit	\$19,728K
Total Cost		\$185K/unit	\$34,138K
Developer Fee	\$3,869K	(27% Deferred)	Paid Year: 5
Contractor Fee	\$2,762K	30% Boost	Yes

DEBT (Must Pay)					CASH FLOW DEBT / GRANT FUNDS					EQUITY / DEFERRED FEES		
Source	Term	Rate	Amount	DCR	Source	Term	Rate	Amount	DCR	Source	Amount	
Citi Bank	15/35	3.55%	\$22,490,000	1.17						CREA	\$10,612,132	
										Dallas Region Developer, LLC	\$1,036,315	
TOTAL DEBT (Must Pay)			\$22,490,000		CASH FLOW DEBT / GRANTS				\$0		TOTAL EQUITY SOURCES	\$11,648,447
											TOTAL DEBT SOURCES	\$22,490,000
											TOTAL CAPITALIZATION	\$34,138,447

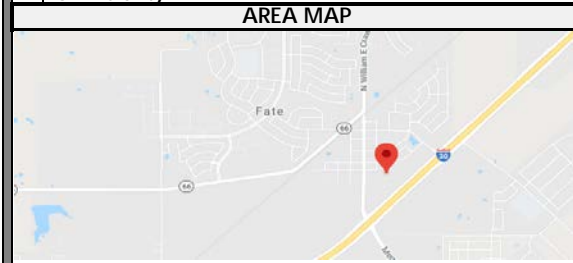
CONDITIONS

- 1 Receipt and acceptance by Cost Certification:
- a: Executed ground lease with Fate Public Facilities Corporation clearly specifying all terms and conditions, including who will retain ownership of land and improvements at the end of the lease.
 - b: Architect certification that all noise assessment recommendations were implemented and the Development is compliant with HUD noise guidelines.
 - c: Architect or engineer certification that the finished ground floor elevation for each building is at least one foot above the floodplain and that all drives, parking and amenities are not more than 6 inches below the floodplain; or certification (including a Letter of Map Amendment or Revision ("LOMA / LOMR-F") if applicable, documenting that the development is not within the 100 year floodplain.
 - d: For any buildings remaining in the floodplain, documentation that flood insurance is in place at the property owner's expense covering both the buildings and the residents' personal property; and certification from the owner that flood insurance for the buildings and for the residents' personal property will remain in force as long as the site remains a designated floodplain.

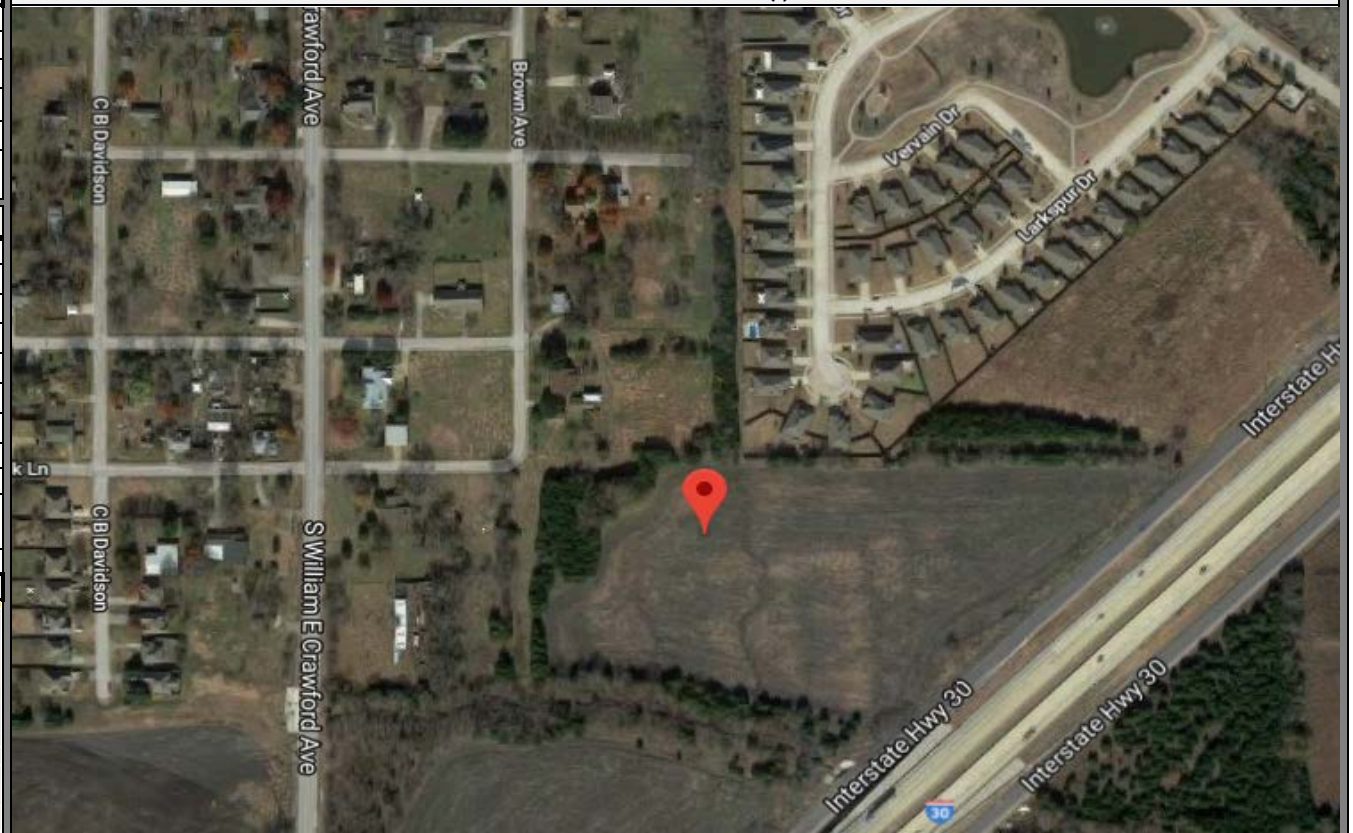
Should any terms of the proposed capital structure change or if there are material changes to the overall development plan or costs, the analysis must be re-evaluated and adjustment to the credit allocation and/or terms of other TDHCA funds may be warranted.

BOND RESERVATION / ISSUER	
Issuer	North Central Texas HFC
Expiration Date	8/30/2020
Bond Amount	\$25,000,000
BRB Priority	Priority 3
Bond Structure	Citi Bank Tax Exempt Loan
% Financed with Tax-Exempt Bonds	92.3%

RISK PROFILE	
STRENGTHS/MITIGATING FACTORS	
▫	Recent comparable developments to support costs
▫	Frontage near major interstate highway
▫	Zoned for Age Restricted Multifamily
▫	City Support
▫	Experienced developer
▫	Flexible leasing with Income Averaging
WEAKNESSES/RISKS	
▫	Higher than average Building Costs
▫	Limited access requires applicant to develop an access road.
▫	Low visibility



AERIAL PHOTOGRAPH(S)

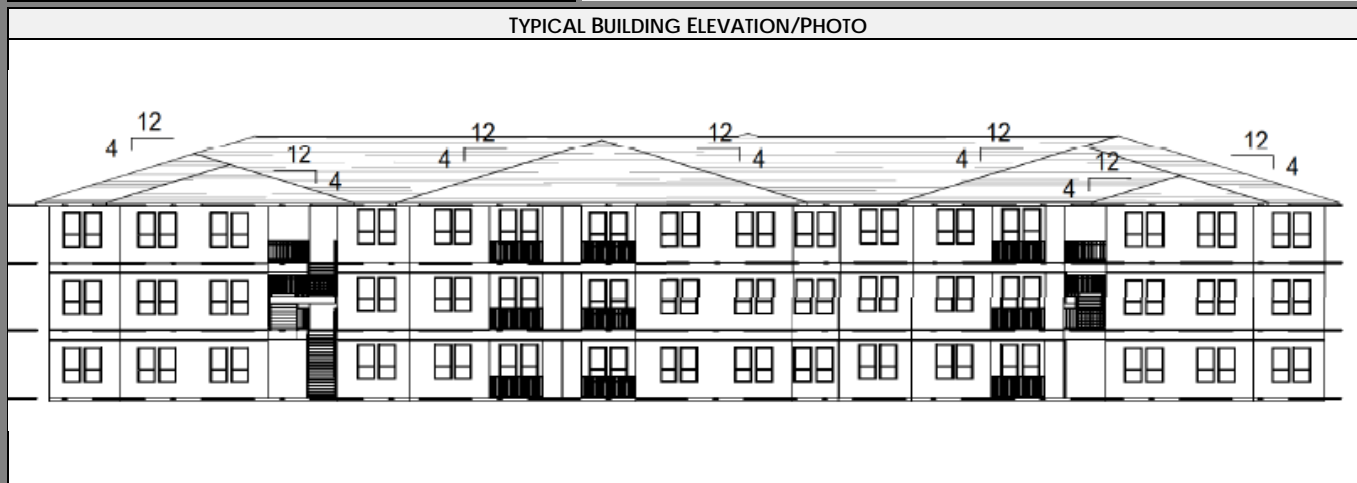


20410 Trader Flats - Application Summary

PROPERTY IDENTIFICATION	
Application #	20410
Development	Trader Flats
City / County	San Antonio / Bexar
Region/Area	9 / Urban
Population	General
Set-Aside	General
Activity	New Construction

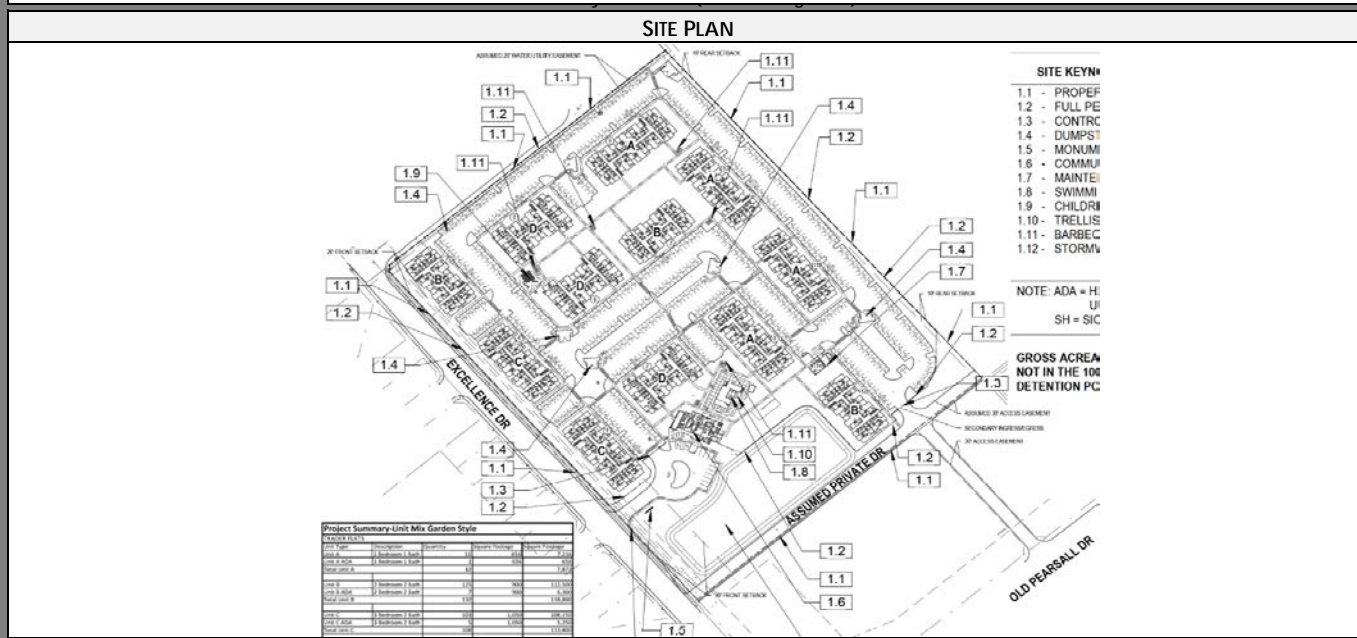
RECOMMENDATION					
TDHCA Program	Request	Recommended			
LIHTC (4% Credit)	\$1,863,629	\$1,863,629	\$5,752/Unit	\$0.95	

KEY PRINCIPAL / SPONSOR		
San Antonio Housing Facility Corporation David Nisivoccia		
The NRP Group Anne Tyler - Project Manager		
Related Parties	Contractor - Yes	Seller - 0



UNIT DISTRIBUTION			INCOME DISTRIBUTION		
# Beds	# Units	% Total	Income	# Units	% Total
Eff	-	0%	30%	33	10%
1	12	4%	40%	-	0%
2	132	41%	50%	-	0%
3	144	44%	60%	224	69%
4	36	11%	MR	-	
TOTAL	324	100%	TOTAL	257	100%

PRO FORMA FEASIBILITY INDICATORS			
Pro Forma Underwritten		Applicant's Pro Forma	
Debt Coverage	1.15	Expense Ratio	40.0%
Breakeven Occ.	85.2%	Breakeven Rent	\$852
Average Rent	\$927	B/E Rent Margin	\$74
Property Taxes	Exempt	Exemption/PILOT	100%
Total Expense	\$4,176/unit	Controllable	\$3,000/unit



MARKET FEASIBILITY INDICATORS			
Gross Capture Rate (10% Maximum)	4.1%		
Highest Unit Capture Rate	23%	2 BR/60%	92
Dominant Unit Cap. Rate	23%	3 BR/60%	99
Premiums (↑60% Rents)	N/A	N/A	
Rent Assisted Units	N/A		

DEVELOPMENT COST SUMMARY			
Costs Underwritten		Applicant's Costs	
Avg. Unit Size	1,011 SF	Density	20.3/acre
Acquisition		\$09K/unit	\$3,000K
Building Cost	\$69.75/SF	\$71K/unit	\$22,857K
Hard Cost		\$94K/unit	\$30,472K
Total Cost		\$168K/unit	\$54,444K
Developer Fee	\$5,861K	(28% Deferred)	Paid Year: 6
Contractor Fee	\$4,015K	30% Boost	Yes

DEBT (Must Pay)					CASH FLOW DEBT / GRANT FUNDS					EQUITY / DEFERRED FEES	
Source	Term	Rate	Amount	DCR	Source	Term	Rate	Amount	DCR	Source	Amount
Key Bank	15/35	3.71%	\$34,590,000	1.15	Interest Income on Bonds	0/0	0.00%	\$345,900	1.15	Boston Financial	\$17,702,701
					Cash Flow during lease up	0/0	0.00%	\$172,950	1.15	Developer Fee	\$1,632,796
TOTAL DEBT (Must Pay)			\$34,590,000		CASH FLOW DEBT / GRANTS			\$518,850		TOTAL EQUITY SOURCES	\$19,335,497
										TOTAL DEBT SOURCES	\$35,108,850
										TOTAL CAPITALIZATION	\$54,444,347

CONDITIONS

1 Receipt and acceptance by Cost Certification:

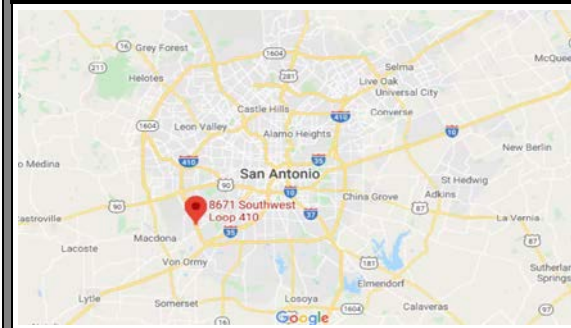
- a: Architect certification that all noise assessment recommendations were implemented and the Development is compliant with HUD noise guidelines.

Should any terms of the proposed capital structure change or if there are material changes to the overall development plan or costs, the analysis must be re-evaluated and adjustment to the credit allocation and/or terms of other TDHCA funds may be warranted.

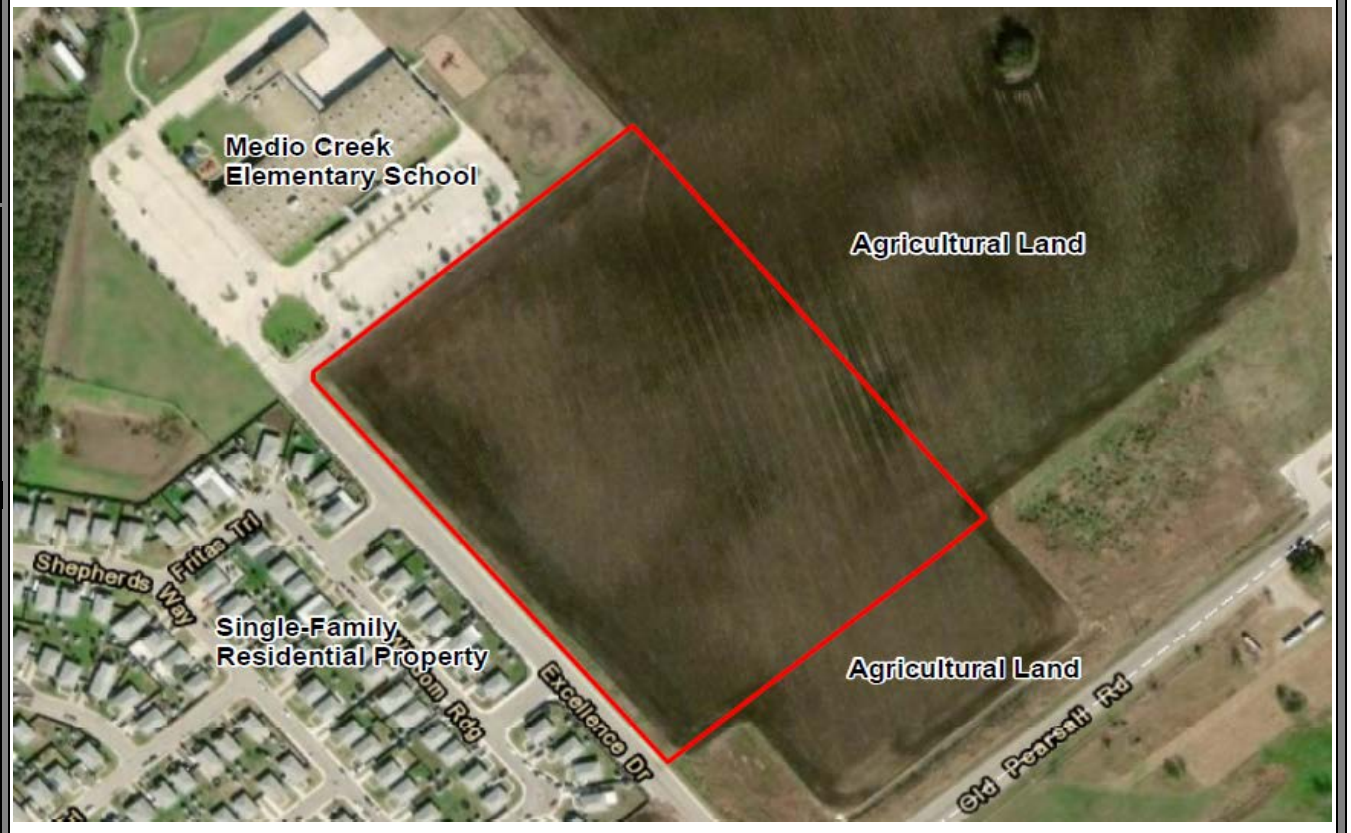
BOND RESERVATION / ISSUER	
Issuer	Las Varas Public Facility Corporation
Expiration Date	7/1/2020
Bond Amount	\$38,000,000
BRB Priority	Priority 3
Bond Structure	
Freddie Mac Tax-Exempt Loan (TEL)	
% Financed with Tax-Exempt Bonds	78.7%

RISK PROFILE	
STRENGTHS/MITIGATING FACTORS	
▫ Experienced Developers	
▫ Market Occupancy	
▫ Feasibility Indicators	
WEAKNESSES/RISKS	
▫ Feasibility reliant on property tax exemption	
▫ 55% of units are 3 and 4 Bedroom	

AREA MAP



AERIAL PHOTOGRAPH(S)

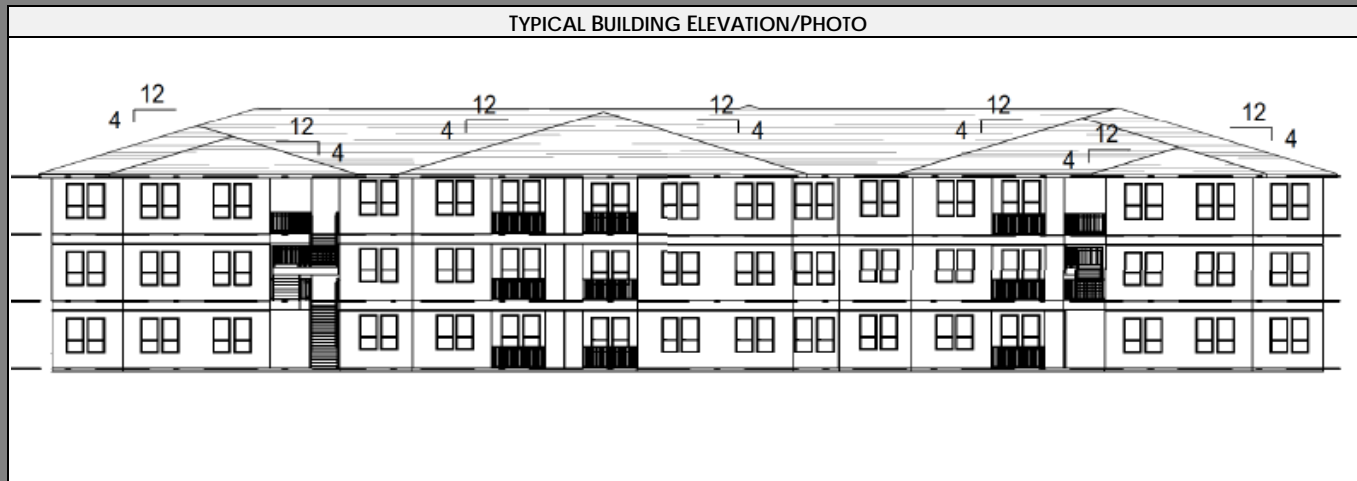


20412 1604 Lofts - Application Summary

REAL ESTATE ANALYSIS DIVISION
May 14, 2020

PROPERTY IDENTIFICATION		RECOMMENDATION			
Application #	20412	TDHCA Program LIHTC (4% Credit)	Request	Recommended	
Development	1604 Lofts		\$1,895,702	\$1,895,702	\$5,851/Unit
City / County	San Antonio / Bexar				
Region/Area	9 / Urban				
Population	General				
Set-Aside	General				
Activity	New Construction				

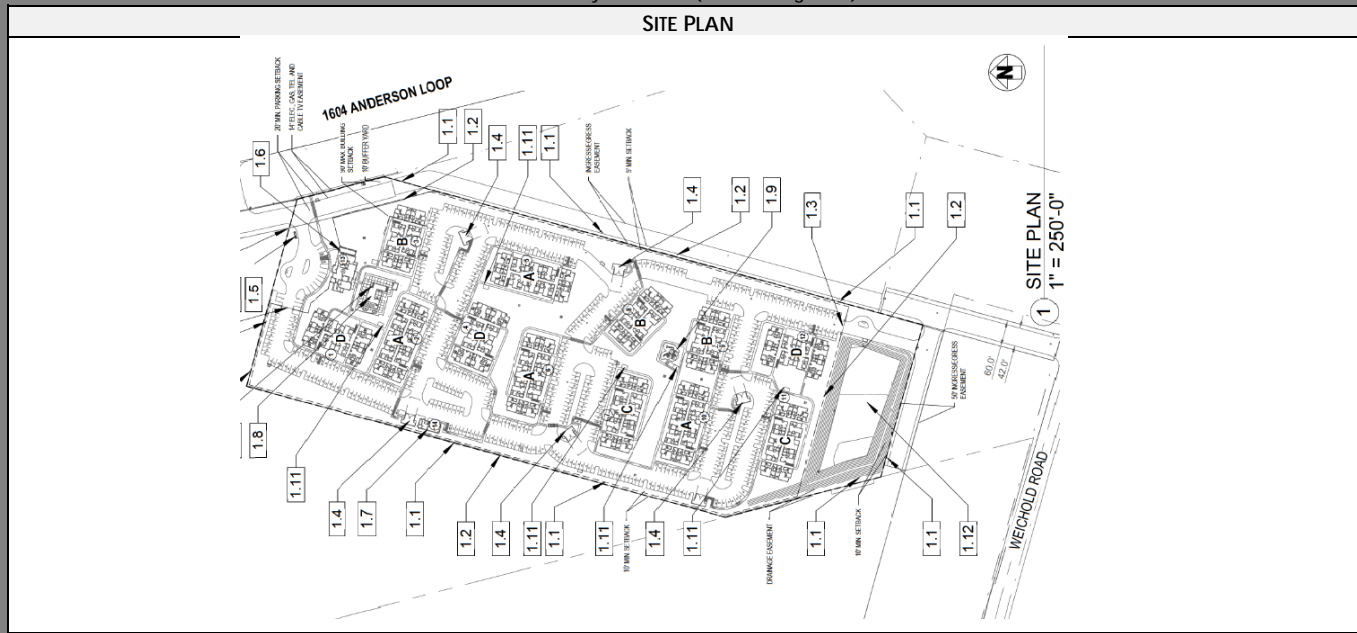
KEY PRINCIPAL / SPONSOR		
San Antonio Housing Facility Corporation David Nisivoccia		
The NRP Group Anne Tyler - Project Manager		
Related Parties	Contractor - Yes	Seller - 0



UNIT DISTRIBUTION			INCOME DISTRIBUTION		
# Beds	# Units	% Total	Income	# Units	% Total
Eff	-	0%	30%	33	10%
1	12	4%	40%	-	0%
2	132	41%	50%	-	0%
3	144	44%	60%	224	69%
4	36	11%	MR	-	0%
TOTAL	324	100%	TOTAL	257	100%

PRO FORMA FEASIBILITY INDICATORS

Pro Forma Underwritten		Applicant's Pro Forma	
Debt Coverage	1.15	Expense Ratio	39.8%
Breakeven Occ.	85.2%	Breakeven Rent	\$850
Average Rent	\$925	B/E Rent Margin	\$75
Property Taxes	Exempt	Exemption/PILOT	100%
Total Expense	\$4,178/unit	Controllable	\$3,000/unit



MARKET FEASIBILITY INDICATORS

Gross Capture Rate (10% Maximum)	4.2%
Highest Unit Capture Rate	25% 2 BR/60% 92
Dominant Unit Cap. Rate	19% 3 BR/60% 99
Premiums (↑60% Rents)	N/A
Rent Assisted Units	N/A

DEVELOPMENT COST SUMMARY

Costs Underwritten	Applicant's Costs	
Avg. Unit Size	1,011 SF	Density 18.7/acre
Acquisition	\$08K/unit	\$2,554K
Building Cost	\$68.84/SF	\$70K/unit \$22,560K
Hard Cost		\$96K/unit \$31,050K
Total Cost		\$172K/unit \$55,782K
Developer Fee	\$6,096K (53% Deferred)	Paid Year: 9
Contractor Fee	\$4,093K	30% Boost Yes

DEBT (Must Pay)					CASH FLOW DEBT / GRANT FUNDS					EQUITY / DEFERRED FEES		
Source	Term	Rate	Amount	DCR	Source	Term	Rate	Amount	DCR	Source	Amount	
Key Bank	15/35	3.68%	#####	1.15		0/0	0.00%	\$300,000	1.15	Boston Financial	\$17,343,935	
TOTAL DEBT (Must Pay)			\$34,925,000		CASH FLOW DEBT / GRANTS			\$300,000		Deferred Developer	\$3,212,934	
											TOTAL EQUITY SOURCES	\$20,556,869
											TOTAL DEBT SOURCES	\$35,225,000
											TOTAL CAPITALIZATION	\$55,781,869

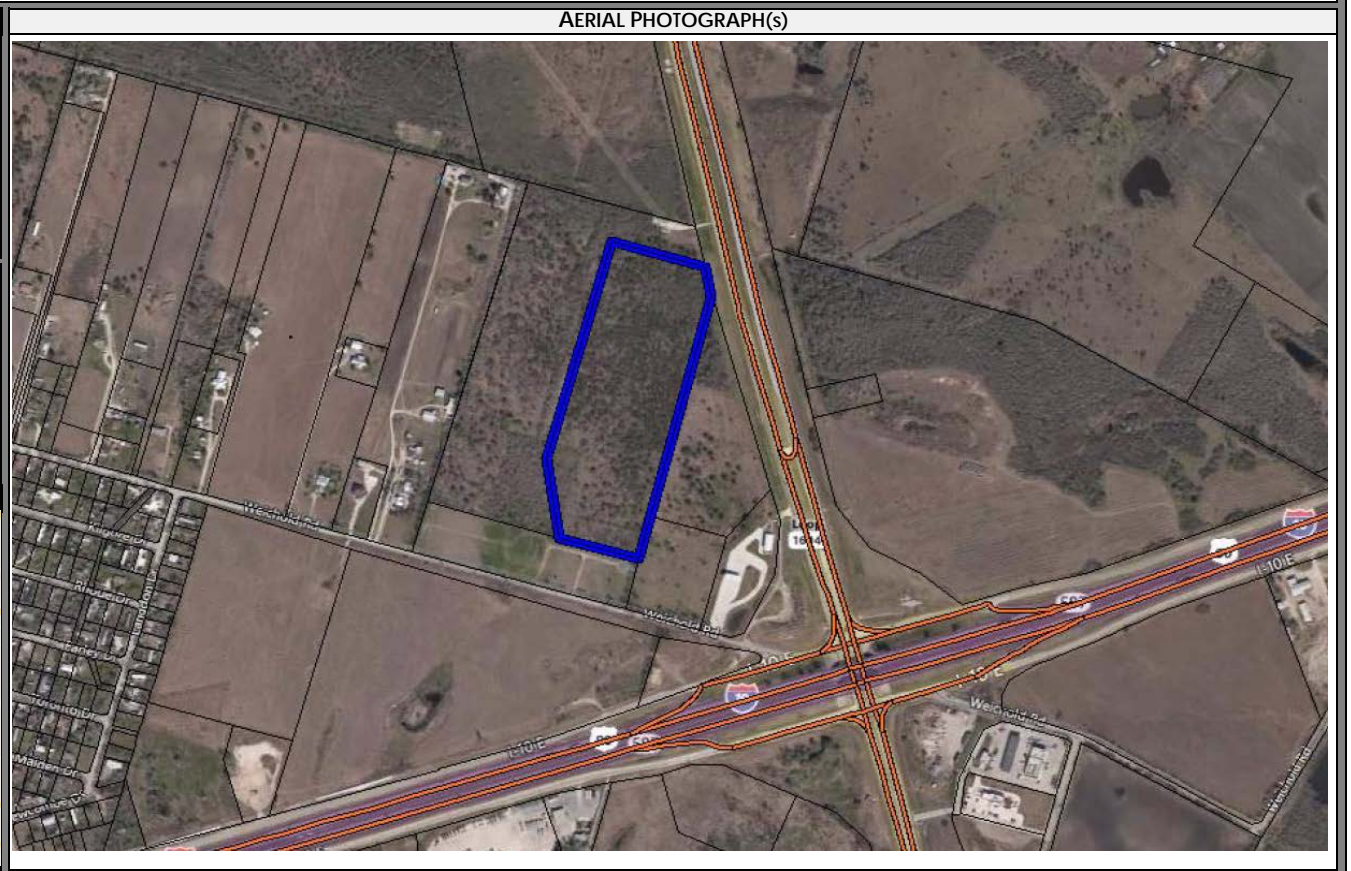
CONDITIONS

1 Receipt and acceptance by Cost Certification:

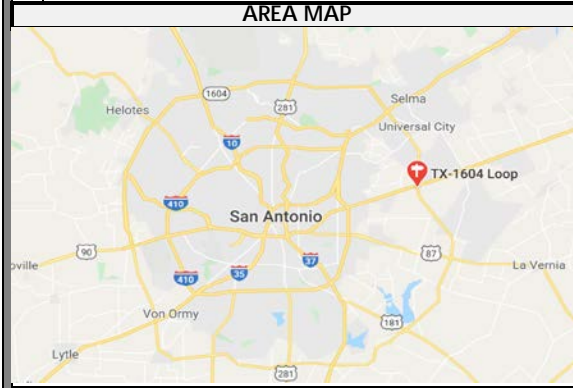
- a: Architect certification that all noise assessment recommendations were implemented and the Development is compliant with HUD noise guidelines.

Should any terms of the proposed capital structure change or if there are material changes to the overall development plan or costs, the analysis must be re-evaluated and adjustment to the credit allocation and/or terms of other TDHCA funds may be warranted.

BOND RESERVATION / ISSUER	
Issuer	Las Varas Public Facility Corporation
Expiration Date	6/30/2020
Bond Amount	\$38,000,000
BRB Priority	Priority 3
Bond Structure	Freddie Mac Tax-Exempt Loan (TEL)
% Financed with Tax-Exempt Bonds	78.8%



RISK PROFILE	
STRENGTHS/MITIGATING FACTORS	
▫ Experienced Developers	
▫ Market Occupancy	
▫ Feasibility Indicators	
WEAKNESSES/RISKS	
▫ Feasibility reliant on property tax exemption	
▫ 55% of units are 3 and 4 Bedroom	

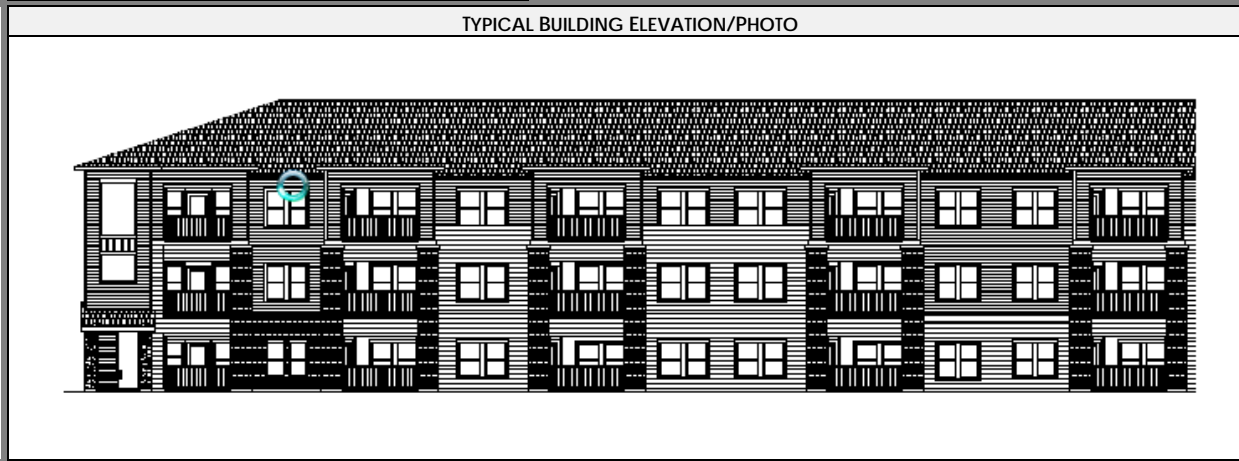


20413 Residences at Merritt Hill - Application Summary

REAL ESTATE ANALYSIS DIVISION
May 14, 2020

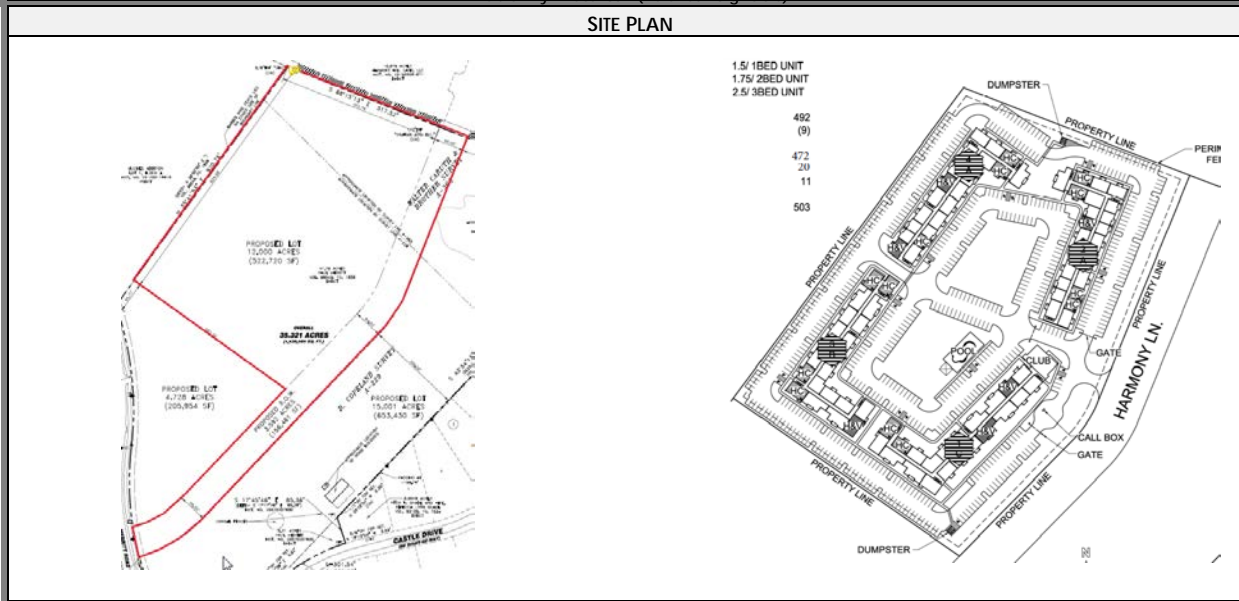
PROPERTY IDENTIFICATION		RECOMMENDATION				
Application #	20413	TDHCA Program	Request	Recommended		
Development	Residences at Merritt Hill	LIHTC (4% Credit)	\$1,888,671	\$1,888,671	\$7,264/Unit	\$0.93
City / County	Rowlett / Dallas					
Region/Area	3 / Urban					
Population	General					
Set-Aside	General					
Activity	New Construction					

KEY PRINCIPAL / SPONSOR		
NuRock Development Robert Hoskins Sandra Hoskins		
Rowlett Housing Finance Corp Rick Sheffield Barbara Holst		
Related Parties	Contractor - <input checked="" type="checkbox"/> Yes	Seller - <input type="checkbox"/> No



UNIT DISTRIBUTION			INCOME DISTRIBUTION		
# Beds	# Units	% Total	Income	# Units	% Total
Eff	-	0%	30%	-	0%
1	56	22%	40%	-	0%
2	136	52%	50%	-	0%
3	68	26%	60%	260	100%
4	-	0%	MR	-	0%
TOTAL	260	100%	TOTAL	260	100%

PRO FORMA FEASIBILITY INDICATORS			
Pro Forma Underwritten		TDHCA's Pro Forma	
Debt Coverage	<input checked="" type="checkbox"/> 1.21	Expense Ratio	<input checked="" type="checkbox"/> 32.9%
Breakeven Occ.	<input checked="" type="checkbox"/> 81.7%	Breakeven Rent	\$930
Average Rent	\$1,056	B/E Rent Margin	<input checked="" type="checkbox"/> \$126
Property Taxes	Exempt	Exemption/PILOT	100%
Total Expense	\$3,929/unit	Controllable	\$2,822/unit



MARKET FEASIBILITY INDICATORS			
Gross Capture Rate (15% Maximum)	<input checked="" type="checkbox"/> 8.6%		
Highest Unit Capture Rate	<input type="checkbox"/> 26%	2 BR/60%	136
Dominant Unit Cap. Rate	<input type="checkbox"/> 26%	2 BR/60%	136
Premiums (↑60% Rents)	#DIV/0!	#DIV/0!	
Rent Assisted Units	N/A		

DEVELOPMENT COST SUMMARY			
Costs Underwritten		Applicant's Costs	
Avg. Unit Size	909 SF	Density	21.7/acre
Acquisition		\$15K/unit	\$3,920K
Building Cost	\$102.83/SF	\$94K/unit	\$24,310K
Hard Cost		\$123K/unit	\$31,861K
Total Cost		\$199K/unit	\$51,627K
Developer Fee	\$5,675K	(19% Deferred)	Paid Year: 3
Contractor Fee	\$4,445K	30% Boost	Yes

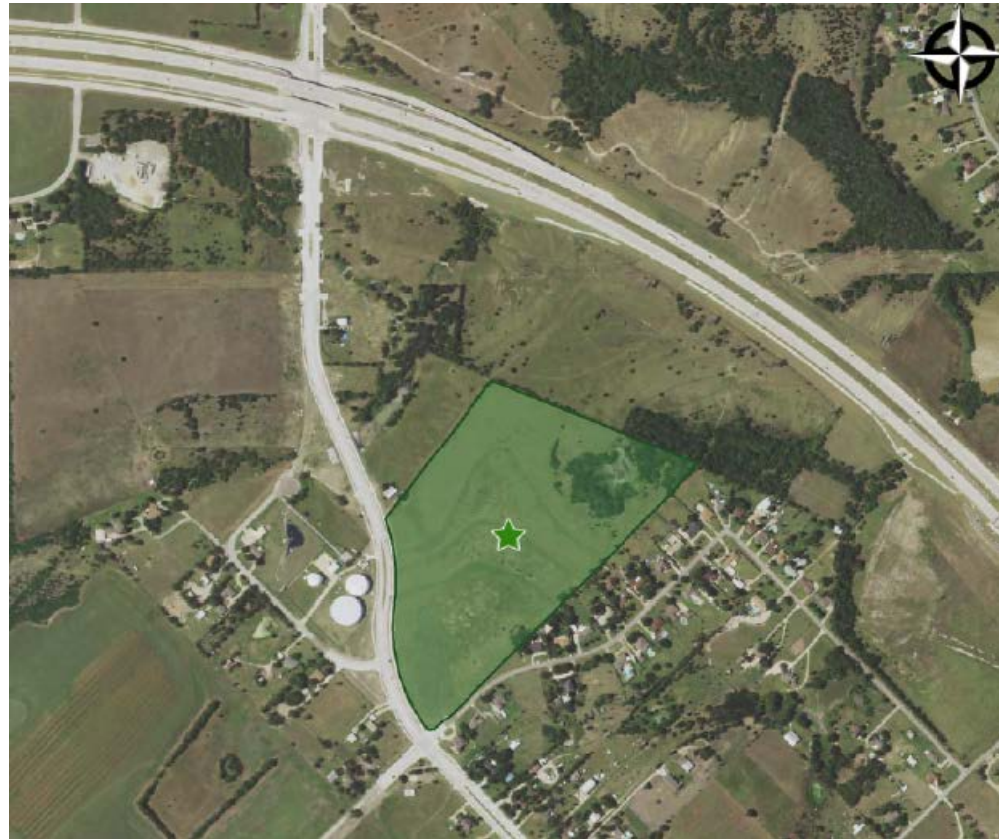
DEBT (Must Pay)					CASH FLOW DEBT / GRANT FUNDS					EQUITY / DEFERRED FEES		
Source	Term	Rate	Amount	DCR	Source	Term	Rate	Amount	DCR	Source	Amount	
Citi Bank	15/35	3.65%	#####	1.21						Boston Capital	\$17,562,884	
										NuRock	\$1,064,454	
TOTAL DEBT (Must Pay)			\$33,000,000		CASH FLOW DEBT / GRANTS				\$0		TOTAL EQUITY SOURCES	\$18,627,338
											TOTAL DEBT SOURCES	\$33,000,000
											TOTAL CAPITALIZATION	\$51,627,338

CONDITIONS

Should any terms of the proposed capital structure change or if there are material changes to the overall development plan or costs, the analysis must be re-evaluated and adjustment to the credit allocation and/or terms of other TDHCA funds may be warranted.

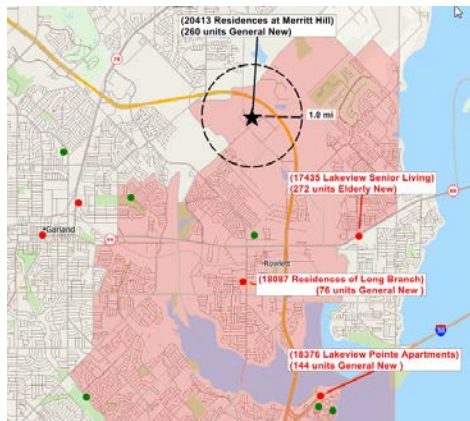
BOND RESERVATION / ISSUER	
Issuer	Rowlett Housing Finance Corp
Expiration Date	7/4/2020
Bond Amount	\$33,000,000
BRB Priority	3
Bond Structure	CitiBank Tax Exempt Loan
% Financed with Tax-Exempt Bonds	75.1%

AERIAL PHOTOGRAPH(s)



RISK PROFILE	
STRENGTHS/MITIGATING FACTORS	
▫	100% property tax exemption
▫	Strong Feasibility Indicators
▫	Experienced Developer
WEAKNESSES/RISKS	
▫	High Capture Rates

AREA MAP



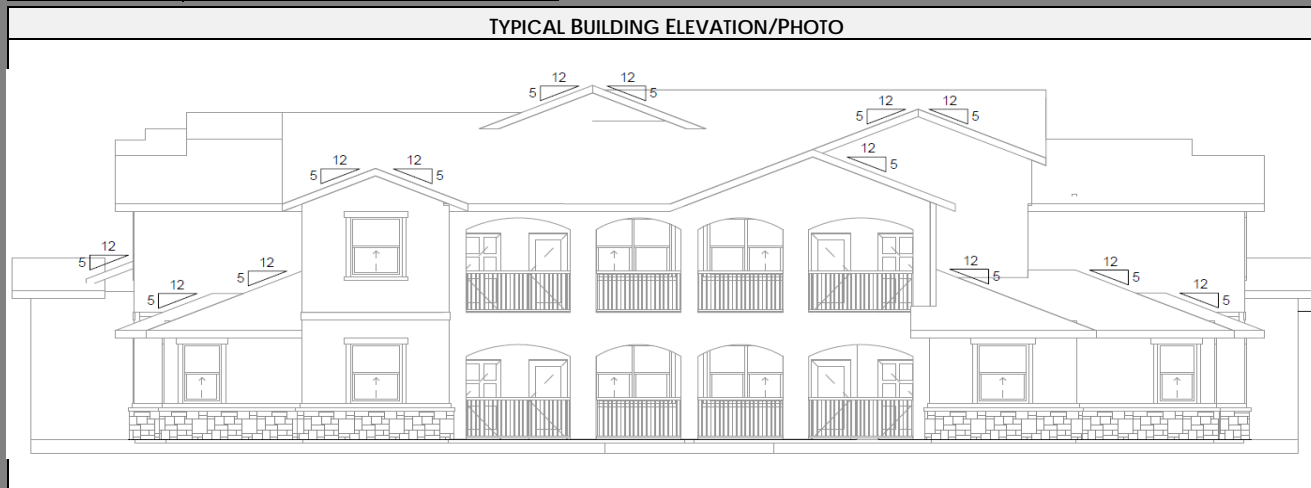
20447 Franklin Park - Application Summary

REAL ESTATE ANALYSIS DIVISION
May 18, 2020

PROPERTY IDENTIFICATION	
Application #	20447
Development	Franklin Park
City / County	Austin / Travis
Region/Area	7 / Urban
Population	General
Set-Aside	General
Activity	Acquisition/Rehab 2003-2004

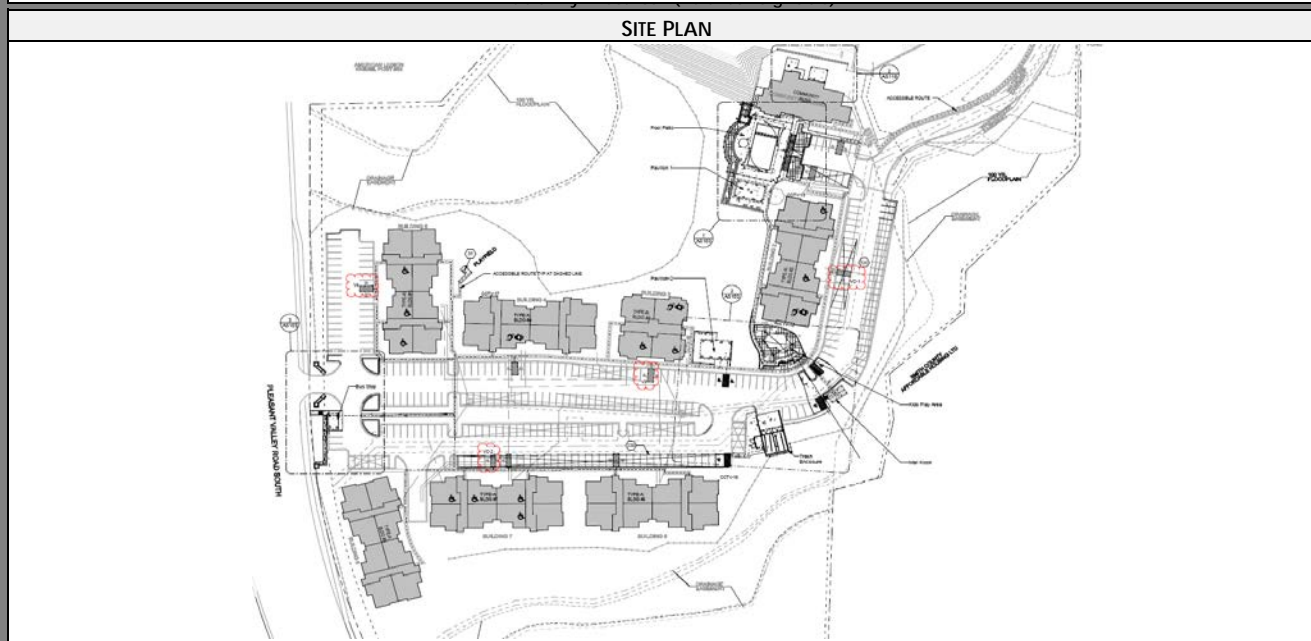
RECOMMENDATION				
TDHCA Program	Request	Recommended		
LIHTC (4% Credit)	\$749,966	\$737,361	\$4,524/Unit	\$0.97

KEY PRINCIPAL / SPONSOR		
Jeff Spicer, Vice President & Project Partner of Dominion Holdings II, LLC & Michael Gerber, President of Austin Affordable Housing Corporation		
Related Parties	Contractor - No	Seller - No



UNIT DISTRIBUTION			INCOME DISTRIBUTION		
# Beds	# Units	% Total	Income	# Units	% Total
Eff	-	0%	30%	26	16%
1	-	0%	40%	53	33%
2	101	62%	50%	52	32%
3	49	30%	60%	-	0%
4	13	8%	80%	32	20%
TOTAL	163	100%	TOTAL	163	100%

PRO FORMA FEASIBILITY INDICATORS			
Pro Forma Underwritten		TDHCA's Pro Forma	
Debt Coverage	1.24	Expense Ratio	44.5%
Breakeven Occ.	82.5%	Breakeven Rent	\$906
Average Rent	\$1,019	B/E Rent Margin	\$112
Property Taxes	Exempt	Exemption/PILOT	100%
Total Expense	\$5,126/unit	Controllable	\$3,787/unit



MARKET FEASIBILITY INDICATORS			
Gross Capture Rate (10% Maximum)	0.8%		
Highest Unit Capture Rate	4%	2 BR/40%	31
Dominant Unit Cap. Rate	3%	2 BR/50%	32
Premiums (↑60% Rents)	Yes	\$304/Avg.	
Rent Assisted Units	N/A		

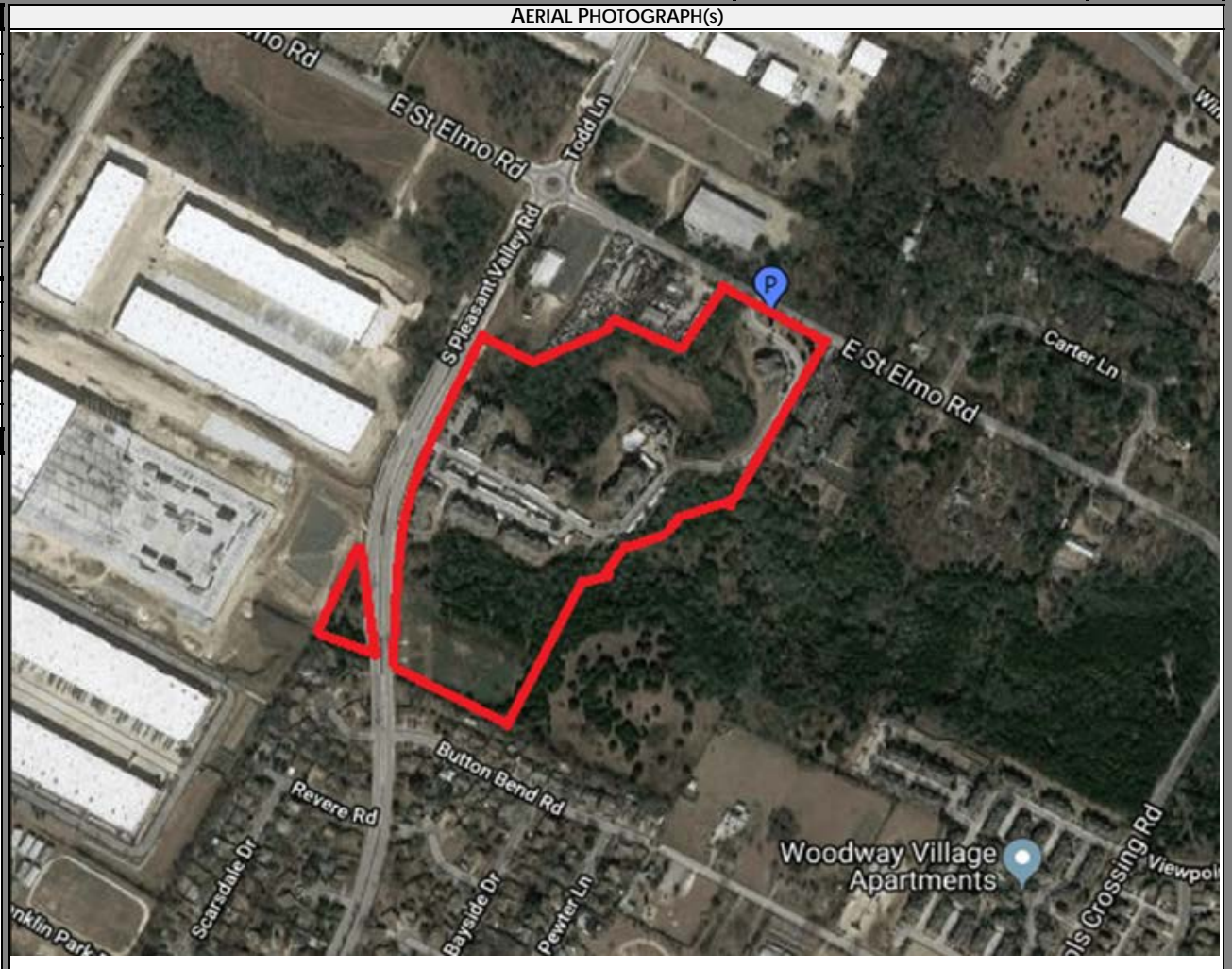
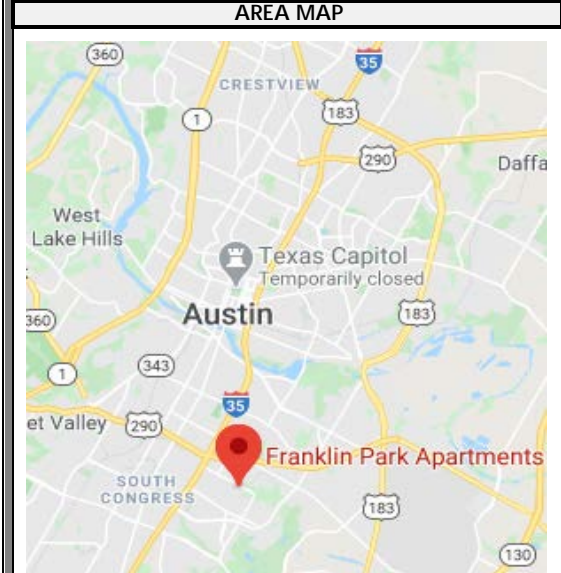
DEVELOPMENT COST SUMMARY			
Costs Underwritten		TDHCA's Costs - Based on PCA	
Avg. Unit Size	1,023 SF	Density	6.3/acre
Acquisition		\$73K/unit	\$11,930K
Building Cost	\$25.72/SF	\$26K/unit	\$4,290K
Hard Cost		\$35K/unit	\$5,703K
Total Cost		\$146K/unit	\$23,762K
Developer Fee	\$2,666K	(1% Deferred)	Paid Year: 1
Contractor Fee	\$794K	30% Boost	Yes

REHABILITATION COSTS / UNIT					
Site Work	\$3K	10%	Finishes/Fixture	\$3K	8%
Building Shell	\$17K	48%	Amenities	\$2K	6%
HVAC	\$3K	7%	Total Exterior	\$22K	70%
Appliances	\$4K	12%	Total Interior	\$10K	30%

DEBT (Must Pay)					CASH FLOW DEBT / GRANT FUNDS					EQUITY / DEFERRED FEES		
Source	Term	Rate	Amount	DCR	Source	Term	Rate	Amount	DCR	Source	Amount	
Bellweather / Freddie Mac TEL	15/35	3.63%	\$15,000,000	1.38						WNC & Associates	\$7,152,398	
Bellweather Taxable Loan	15/35	3.93%	\$1,578,176	1.24						Austin Leased Housing Development III	\$31,201	
TOTAL DEBT (Must Pay)			\$16,578,176		CASH FLOW DEBT / GRANTS				\$0		TOTAL EQUITY SOURCES	\$7,183,599
											TOTAL DEBT SOURCES	\$16,578,176
											TOTAL CAPITALIZATION	\$23,761,775

BOND RESERVATION / ISSUER	
Issuer	AAHC PFC
Expiration Date	6/12/2020
Bond Amount	\$15,000,000
BRB Priority	Priority 3
Close Date	TBD
Bond Structure	Freddie Mac Tax Exempt Loan
% Financed with Tax-Exempt Bonds	74.2%

RISK PROFILE	
STRENGTHS/MITIGATING FACTORS	
▫	100% Property Tax Exemption
▫	Potential rent increase on 80% units with improved
WEAKNESSES/RISKS	
▫	Only 30% of Rehab Cost Spent on Unit Interiors
▫	Market Risk on 80% AMI Units



20450 Mira Vista Ranch Apartments - Application Summary

REAL ESTATE ANALYSIS DIVISION

May 6, 2020

PROPERTY IDENTIFICATION	
Application #	20450
Development	Mira Vista Ranch Apartments
City / County	San Antonio / Bexar
Region/Area	9 / Urban
Population	General
Set-Aside	General
Activity	New Construction

RECOMMENDATION					
TDHCA Program	Request	Recommended			
LIHTC (4% Credit)	\$1,783,385	\$1,783,385	\$5,716/Unit	\$0.90	

KEY PRINCIPAL / SPONSOR		
<ul style="list-style-type: none"> Michael Hogan / Hogan Properties Company, Inc. dba HomeSpring Realty Partners (75% of Developer's Fee) San Antonio Housing Facility Corporation (25% of Developer's Fee) 		
Related Parties	Contractor - No	Seller - No

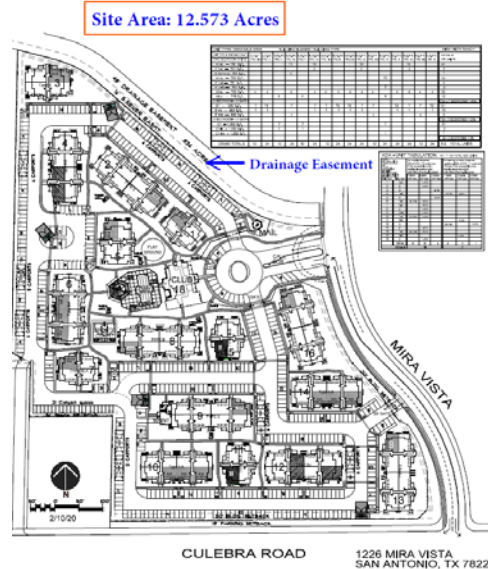
TYPICAL BUILDING ELEVATION/PHOTO



UNIT DISTRIBUTION			INCOME DISTRIBUTION		
# Beds	# Units	% Total	Income	# Units	% Total
Eff	-	0%	30%	-	0%
1	124	40%	40%	-	0%
2	164	53%	50%	-	0%
3	24	8%	60%	312	100%
4	-	0%	MR	-	0%
TOTAL	312	100%	TOTAL	312	100%

PRO FORMA FEASIBILITY INDICATORS			
Pro Forma Underwritten		Applicant's Pro Forma	
Debt Coverage	1.24	Expense Ratio	40.0%
Breakeven Occ.	81.9%	Breakeven Rent	\$757
Average Rent	\$859	B/E Rent Margin	\$103
Property Taxes	Exempt	Exemption/PILOT	100%
Total Expense	\$3,960/unit	Controllable	\$2,766/unit

SITE PLAN



MARKET FEASIBILITY INDICATORS			
Gross Capture Rate (10% Maximum)	9.2%		
Highest Unit Capture Rate	31%	2 BR/60%	164
Dominant Unit Cap. Rate	31%	2 BR/60%	164
Premiums (↑60% Rents)	N/A	N/A	
Rent Assisted Units	N/A		

DEVELOPMENT COST SUMMARY			
Costs Underwritten		Applicant's Costs	
Avg. Unit Size	912 SF	Density	24.8/acre
Acquisition		\$00K/unit	\$K
Building Cost	\$85.30/SF	\$78K/unit	\$24,268K
Hard Cost		\$95K/unit	\$29,774K
Total Cost		\$145K/unit	\$45,315K
Developer Fee	\$5,440K	(5% Deferred)	Paid Year: 1
Contractor Fee	\$3,483K	30% Boost	Yes

DEBT (Must Pay)					CASH FLOW DEBT / GRANT FUNDS					EQUITY / DEFERRED FEES		
Source	Term	Rate	Amount	DCR	Source	Term	Rate	Amount	DCR	Source	Amount	
Bellwether Enterprise	18/40	4.15%	\$28,000,000	1.28						Affordable Housing Partners, Inc.	\$16,048,862	
Bellwether Enterprise Taxable Bond	18/40	4.70%	\$1,000,000	1.24						HomeSpring Realty Partners	\$266,003	
TOTAL DEBT (Must Pay)			\$29,000,000		CASH FLOW DEBT / GRANTS				\$0		TOTAL EQUITY SOURCES	\$16,314,865
											TOTAL DEBT SOURCES	\$29,000,000
											TOTAL CAPITALIZATION	\$45,314,865

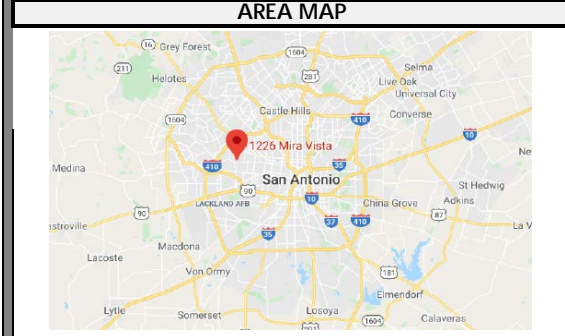
CONDITIONS

- 1 Receipt and acceptance by Cost Certification:
- Architect certification that a noise assessment was completed and that all recommendations were implemented such that the Development is compliant with HUD noise guidelines.

Should any terms of the proposed capital structure change or if there are material changes to the overall development plan or costs, the analysis must be re-evaluated and adjustment to the credit allocation and/or terms of other TDHCA funds may be warranted.

BOND RESERVATION / ISSUER	
Issuer	Las Varas Public Facility Corporation
Expiration Date	12/21/2022
Bond Amount	\$28,000,000
BRB Priority	N/A
Bond Structure	Private Placement
% Financed with Tax-Exempt Bonds	76.4%

RISK PROFILE	
STRENGTHS/MITIGATING FACTORS	
HTC properties in PMA average 99% occupancy	
Overall Feasibility Indicators	
New in-fill construction & attractive design should enhance leasing	
Low maintenance construction (metal roofs/masonry exteriors)	
Developer/Owner's construction and management experience	
WEAKNESSES/RISKS	
9.2% gross capture rate with 1 & 2BR unit capture	
Project is not feasible without property tax exemption	
Single point of ingress/egress	



1g

BOARD ACTION REQUEST
MULTIFAMILY FINANCE DIVISION
MAY 21, 2020

Presentation, discussion and possible action on a waiver related to §11.101(a)(1) regarding Site Requirements and Restrictions for Palladium Port Aransas (#20401) in Port Aransas

RECOMMENDED ACTION

WHEREAS, Palladium Port Aransas (#20401) was awarded 4% Housing Tax Credits in the amount of \$1,155,074, an award of TCAP RF in the amount of \$4,000,000 and an award of \$4,000,000 from the State of Texas Economic Stabilization Fund at the Board meeting of April 23, 2020;

WHEREAS, the Real Estate Analysis Report included a condition due at closing on the Direct Loan for a certification that if the site is in the 100-year floodplain when it places in service, the finished ground floor elevation of the buildings will be at least one foot above the floodplain and that all drives, parking and amenities will be no more than 6 inches below the floodplain; and that the Owner will provide flood insurance coverage for the buildings and for the residents' personal property until such time that the site is officially designated to be no longer in the floodplain;

WHEREAS, subsequent to the Board meeting, the applicant informed the Department that they will be unable to meet this condition due to restrictions on the site governed by the US Fish and Wildlife Service who manages the US wetlands under the US Department of Interior;

WHEREAS, the applicant has requested a waiver, pursuant to 10 TAC §11.207 of the Qualified Allocation Plan (QAP), of this requirement contained in 10 TAC §11.101(a)(1) of the QAP relating to design requirements for new construction developments in a floodplain;

WHEREAS, based on the information provided by the applicant and discussed herein, staff recommends the waiver be granted; and

WHEREAS, granting the waiver better serves the purposes articulated in Tex. Gov't Code, §§2306.001 and 2306.002 by contributing to the City of Port Aransas' redevelopment efforts post Hurricane Harvey, providing for the housing needs of low income families affected by the lack of affordable housing options on the island, and assisting the legislature in coordinating federal and state programs (in recognition of the \$4,000,000 in the State of Texas Economic Stabilization Fund that was directed for this use);

NOW, therefore, it is hereby,

RESOLVED, that the waiver request relating to development restrictions in a floodplain for Palladium Port Aransas (#20401) is hereby granted, contingent upon the issuance of a

Firm Commitment from the U.S Department of Housing and Urban Development (HUD), as the lender in the transaction.

BACKGROUND

General Information: The development is proposed to be located at Highway 361 and Charlie's Pasture South Trail in Port Aransas, Nueces County, and involves the new construction of 183 units serving the general population. Port Aransas is located on the northern end of Mustang Island of Port Aransas and the vast majority of the island is considered to be in the floodplain.

The applicant has requested a waiver of 10 TAC §11.101(a)(1) relating to design requirements for new construction developments in a floodplain. The applicable portions of the requirement in the rule reads as follows:

“(1) Floodplain. New Construction or Reconstruction Developments located within a 100 year floodplain as identified by the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps must develop the site in full compliance with the National Flood Protection Act and all applicable federal and state statutory and regulatory requirements. The Applicant will have to use floodplain maps and comply with regulation as they exist at the time of commencement of construction. Even if not required by such provisions, the Site must be developed so that all finished ground floor elevations are at least one foot above the floodplain and parking and drive areas are no lower than six inches below the floodplain. If there are more stringent federal or local requirements they must also be met. If no FEMA Flood Insurance Rate Maps are available for the proposed Development Site, flood zone documentation must be provided from the local government with jurisdiction identifying the 100 year floodplain.”

The US Fish and Wildlife Service (USFWS) who manages the US wetlands under the US Department of Interior has indicated that to bring the sidewalks and parking area no lower than six inches below the floodplain will require building five-foot retaining walls around the wetlands/pond areas. They further elaborate that such retaining wall will restrict access to the water for small mammals, turtles, amphibians and migratory birds, which will further decrease the ecological viability of the pond and wetland system. Moreover, according to USFWS, the restricted access to the area for maintenance will prevent the control of invasive species of plants and animals, which could enter the surrounding natural ecosystem when waters are released. However, the USFWS letter also states that they are not the agency to determine potential harm to humans. Under the MAP Guide, this is HUD's role under Executive Order 11988 (Floodplain Management), and staff is recommending this waiver contingent upon HUD's issuance of a Firm Commitment.

These representations by USFWS, combined with the fact that the vast majority of the island is in the floodplain, does not provide the applicant with alternatives to provide much needed affordable housing to Port Aransas. Combined these factors demonstrate that these features limit mitigation of the site in a way that is beyond the control of the applicant, which satisfies §11.207(1) of the QAP.

As it relates to §11.207(2) of the QAP, a waiver of these provisions is necessary in order to provide affordable housing on the island of Port Aransas. Staff believes that granting the waiver better serves the purposes articulated in Tex. Gov't Code, §§2306.001 and 2306.002 by contributing to the City of Port Aransas' redevelopment efforts post Hurricane Harvey. After being hit hard by Hurricane Harvey, many of the units being rebuilt will be short-term rentals for holiday visitors, not workforce housing as they were before. The Palladium Port Aransas development will be providing for the housing needs of low income families affected by the lack of affordable housing options on the island, particularly for those who work on the island but live on the mainland due to lack of affordable housing. Moreover, the waiver supports §2306.001(4) and §2306.002(2) by assisting the local government in providing housing options and the legislature in coordinating federal and state programs (in recognition of the \$4,000,000 in the State of Texas Economic Stabilization Fund that was directed specifically for this use and the use of HUD's 221d4 loan product).



VIA EMAIL

May 14, 2020

Texas Department of Housing and Community Affairs
Attn: Marni Holloway - Director of Multifamily Finance
221 East 11th Street
Austin, TX 78701

RE: #20401 Palladium Port Aransas 4% (Non-Competitive) 2020 Application - Waiver Request

Dear Marni:

Please accept this letter as our request for a waiver for Section 11.101(a)(1) Site and Development Requirements and Restrictions in the 2020 TDHCA QAP and Multifamily Rules related to parking and drive areas being no lower than six inches above the floodplain.

As required in Section 11.207 this waiver request meets the requirements in subparagraphs (1) and (2).

1. Palladium Port Aransas is located on the northern end of Mustang Island of Port Aransas where environmental conditions are regulated by the US Department of Interior's Fish and Wildlife Service (USFWS). Bringing the sidewalks and parking area no lower than six inches below the floodplain will require building five-foot retaining walls around the wetlands/pond areas. Per USFWS this will restrict access to the water for small mammals, turtles, amphibians and migratory birds which will further decrease the ecological viability of the pond and wetland system. Additionally, the restricted access to the area for maintenance will prevent the control of invasive species of plants and animals which could enter the surrounding natural ecosystem when waters are released (See Exhibit "A"). This waiver request is required because raising the parking and drive areas no lower than six inches below the floodplain would cause harm to the environment per USFWS and is beyond the control of the applicant.
2. By granting this waiver it better serves the policies and purposes articulated in Tex. Gov't Code §§2306.001, 2306.002, 2306,6701 than not granting the waiver. Port Aransas was devastated by Hurricane Harvey in 2017. The hurricane destroyed much of the short-term rental housing and long-term rental housing for permanent residents. The hurricane destroyed or significantly damaged infrastructure, local businesses and municipal facilities. City officials have determined that a minimum 480 workforce housing units were demolished or rendered uninhabitable and yet to be demolished. Many of the previously long-term rental units are being rebuilt but converting to short term vacation rentals. Very little replacement or new housing is being built or planned as long-term rental workforce housing. Due to the lack of the long-term housing, the City has lost its workforce. Because of the lack of permanent long-term housing and there has been a decline in population and the City's school district has had to bus students from mainland areas in an effort to maintain the minimum student enrollment required to keep the schools open. Palladium Port Aransas will provide much needed long-term rental housing in the City of Port Aransas.

We respectfully request the Board's consideration for this waiver and find that the need for the waiver is necessary and better serves the policies and purposes of the Department's programs.

Should you have any questions or require additional information please contact me. My contact information is below.

Sincerely,



Thomas E. Huth
President and CEO
Palladium USA International, Inc.
Phone: 972-774-4400
Fax: 972-774-4484
Email: thuth@palladiumusa.com

Attachment

From: Scott Johnson <sjohnson@palladiumusa.com>
Sent: Wednesday, May 13, 2020 2:21 PM
To: Sara Reidy
Subject: FW: [EXTERNAL] Palladium Port Aransas - Parking Lot Elevation Inquiry

Sara,
To be clear, US Fish and Wildlife Service (USFWS) is under the US Department of Interior, and they manage the US wetlands.

Thank you.

Scott E. Johnson
Palladium USA International, Inc.
Catalyst Builders, Inc.
13455 Noel Rd.
Suite 400
Dallas, TX 75240
972-774-4450

"Changing lives - one apartment home at a time"

NOTICE: The information contained in this message is intended for the personal and confidential use of the addressee. If you are not the addressee or an agent of the addressee, you are hereby notified that you have received this message in error and that any review, dissemination, distribution, or copying of this message is strictly prohibited. If you have received this message in error, please notify Palladium USA immediately by telephone and delete the original message.

From: Lee, Mary A <mary_lee@fws.gov>
Sent: Wednesday, May 13, 2020 1:48 PM
To: Tracy Watson <Tracy@phaseengineering.com>
Cc: Scott Johnson <sjohnson@palladiumusa.com>; Gardiner, Dawn <dawn_gardiner@fws.gov>
Subject: RE: [EXTERNAL] Palladium Port Aransas - Parking Lot Elevation Inquiry

Hello Tracy,

Thank you for your email regarding the TDHCA requirement for the elevation of the property parking areas to an additional 18 inches.

We believe that the changes already proposed by the project will exclude endangered Whooping Cranes from using the area. However, you are correct in your concern that the addition of the retaining wall around the wetlands will restrict the access to water for other small mammals, turtles, amphibians, and migratory birds. This would further decrease the ecological viability of the pond and wetland system.

Concerns also stem from the displacement of water on landscape level in the event of a flooding event. Increased flooding in the surrounding properties and potential increased erosion along the edge of the property are likely side effects.

Additionally, the restricted access to the area for maintenance will prevent the control of invasive species of plants and animals which could enter into the surrounding natural ecosystem when waters are released.

Safety and hazard effects to the human residents would be best addressed by a different party. However, it is likely that in the event of a sudden storm event, air breathing animals which are caught, or are sheltering, in the interior of the retention pond area are likely to drown.

Sincerely,
M. Sandra Lee

*Wildlife Biologist
Texas Coastal Ecological Services Field Office
U.S. Fish and Wildlife Service
4444 Corona Drive, suite 215
Corpus Christi, TX 78411*

Direct line (361) 225-7316

From: Tracy Watson <Tracy@phaseengineering.com>
Sent: Wednesday, May 13, 2020 11:23 AM
To: Lee, Mary A <mary_lee@fws.gov>
Cc: Scott Johnson <sjohnson@palladiumusa.com>; Gardiner, Dawn <dawn_gardiner@fws.gov>
Subject: [EXTERNAL] Palladium Port Aransas - Parking Lot Elevation Inquiry
Importance: High

Good morning Sandra,

Thank you again for your help in working with us on evaluating biological impacts from the proposed Palladium Port Aransas multifamily development. As I had discussed with you yesterday, the underwriting requirements for TDHCA (related to the project's tax-credit funding) state that all parking and drive areas are not to be lower than six inches below the base floodplain elevation. As currently proposed, all the buildings will be constructed with the lowest finished floor one foot above the BFE, however In order to meet the parking requirement an additional significant portion of the property would need to be raised another 18". In addition, a 5' retaining wall would be required around the proposed onsite wetland/pond areas in order to meet the new elevations.

Our concern is that the addition of the retaining wall would cause several adverse conditions, including restricting drainage and access for wildlife, maintenance activities, and most importantly safety hazards.

The tax credits are very important for the feasibility of this project, and the TDHCA Board may waive this requirement if regulatory agencies and municipalities provide evidence that this change would cause harm to the environment and negatively affect the project. We are requesting that the USFWS could simply reply to this email stating that you agree raising the ground elevation is not a preferred method of construction or management of wetlands. If you are able to cite any additional reasoning for not raising the parking areas, please let us know.

I truly appreciate your responsiveness to this request, and unfortunately TDHCA representatives are requiring a response **today**. Please let me know if you have any questions or need additional information in providing your recommendation ASAP.

Respectfully,

Tracy Watson
VP Special Projects

Cell 713-854-8670

Tracy@PhaseEngineering.com

Order Proposals Online at www.PhaseEngineering.com

1j

BOARD ACTION REQUEST
MULTIFAMILY FINANCE DIVISION
MAY 21, 2020

Presentation, discussion, and possible action on the Third Amendment to the 2020-1 Multifamily Direct Loan Notice of Funding Availability

RECOMMENDED ACTION

WHEREAS, the Board previously approved the 2020-1 Multifamily Direct Loan Notice of Funding Availability (2020-1 NOFA), which included \$13,846,168 in HOME funds;

WHEREAS, the Board previously approved the First Amendment to the 2020-1 NOFA reprogramming \$5,385,999.20 in National Housing Trust Fund (NHTF) into the Soft Repayment set-aside of the 2020-1 NOFA;

WHEREAS, the Board previously approved the Second Amendment to the 2020-1 NOFA reprogramming \$4,123,858 in NHTF into the Soft Repayment set-aside of the 2020-1 NOFA;

WHEREAS, the Department has \$3,000,000 in NHTF available as a result of a recently withdrawn application under the 2020-2B Multifamily Direct Loan Special Purpose Notice of Funding Availability (2020-2B NOFA);

WHEREAS, all available NHTF was subject to the Regional Allocation Formula (RAF) under the 2018-1 and/or 2019-1 NOFA, and is therefore not subject to the RAF under the 2020-1 NOFA; and

WHEREAS, staff recommends programming all \$3,000,000 in available NHTF into the Soft Repayment set-aside of the 2020-1 NOFA and increasing the maximum per application request under the Soft Repayment set-aside of the 2020-1 NOFA to \$3,000,000;

NOW, therefore, it is hereby

RESOLVED, that \$3,000,000 in NHTF be added to the Soft Repayment set-aside with the maximum per application request increasing to \$3,000,000 as of May 22, 2020; and

FURTHER RESOLVED, the Executive Director and staff as designated by the Executive Director are authorized, empowered, and directed, for and on behalf of the Department to execute such documents, instruments, and writings and perform such acts and deeds as may be necessary to effectuate the foregoing.

BACKGROUND

On December 12, 2019, the Board approved the 2020-1 NOFA. On December 27, 2019, the 2020-1 NOFA was published in the *Texas Register* announcing the availability of up to \$13,846,168 in HOME funds for the development of affordable multifamily rental housing. On February 27, 2020, the Board approved the First Amendment to the 2020-1 NOFA reprogramming \$5,385,999 in available NHTF into the 2020-1 Soft Repayment set-aside. The Amended 2020-1 NOFA was published in the *Texas Register* on March 13, 2020. On April 23, 2020, the Board approved the Second Amendment to the 2020-1 NOFA reprogramming \$4,123,858 in NHTF into the 2020-1 Soft Repayment set-aside. The Amended 2020-1 NOFA was published in the *Texas Register* on May 8, 2020.

Earlier this month, an application under the 2020-2B Special Purpose NOFA that would have received NHTF had they been recommended for a Direct Loan award withdrew their application. This withdrawal resulted in \$3,000,000 of NHTF becoming available for use in the Soft Repayment set-aside of the 2020-1 NOFA. Additionally, staff is recommending that the maximum per application request under the Soft Repayment set-aside be increased from \$2,000,000 to \$3,000,000 based on upcoming federal commitment deadlines for NHTF.

Because all available NHTF was previously subject to RAF in its respective 2018-1 and/or 2019-1 NOFA, all NHTF in the 2020-1 NOFA will immediately be available statewide.

No changes have been made that would impact the Priority considerations under the 2020-1 NOFA. Furthermore, 2020 9% Housing Tax Credit (HTC) layered applications under the Soft Repayment set-aside will not have the ability to request additional NHTF until after 9% HTC allocations are made, and only in accordance with 10 TAC §13.5(h)(2).

Moving forward, staff will continue to monitor the demand for Direct Loan funds and may recommend further amendments to the NOFA as necessary.



TEXAS DEPARTMENT OF HOUSING AND COMMUNITY AFFAIRS
MULTIFAMILY DIRECT LOAN
2020-1 NOTICE OF FUNDING AVAILABILITY (NOFA)
ANNUAL NOFA
THIRD AMENDMENT
EFFECTIVE MAY 22, 2020

THIS AMENDMENT ADDS \$3,000,000 IN NATIONAL HOUSING TRUST FUND (NHTF) TO THE SOFT REPAYMENT SET-ASIDE AND INCREASES THE MAXIMUM PER APPLICATION REQUEST IN THE SOFT REPAYMENT SET-ASIDE TO \$3,000,000. ALL NHTF IS AVAILABLE ON A STATEWIDE BASIS. THIS AMENDMENT REPLACES IN ITS ENTIRETY SECTIONS 1, 2B, AND THE TABLE IN SECTION 2. ALL OTHER SECTIONS OF THE 2020-1 NOFA REMAIN AS ORIGINALLY PUBLISHED, OR AS OTHERWISE PUBLISHED IN THE FIRST AMENDMENT TO THE 2020-1 NOFA.

1) Summary. The Texas Department of Housing and Community Affairs (the Department) announces the availability of up to **\$26,356,025.20 in total HOME¹ and NHTF funding** for the development of affordable multifamily rental housing for low-income Texans. Applications under the CHDO and General Set-Asides of the 2020-1 NOFA will be accepted from January 13, 2020 through August 31, 2020 (if sufficient funds remain). Applications under the Soft Repayment Set-Aside of the 2020-1 NOFA will be accepted February 28, 2020 through August 31, 2020 (if sufficient funds remain). The availability and use of these funds are subject to the following rules, as applicable:

a. Texas Administrative Code

- 10 TAC Chapter 1 (Administration)
- 10 TAC Chapter 2 (Enforcement)
- 10 TAC Chapter 10 (Uniform Multifamily Rules)
- 10 TAC Chapter 11 (Qualified Allocation Plan)
- 10 TAC Chapter 12 (Multifamily Housing Revenue Bonds)
- 10 TAC Chapter 13 (Multifamily Direct Loan Rule)

[http://texreg.sos.state.tx.us/public/readtac\\$ext.ViewTAC?tac_view=3&ti=10&pt=1](http://texreg.sos.state.tx.us/public/readtac$ext.ViewTAC?tac_view=3&ti=10&pt=1)

b. Texas Government Code

¹ HOME funds under this NOFA may only be awarded to Applications with Development Sites in non-Participating Jurisdictions.

Tex. Gov't. Code Chapter 2306

<http://www.statutes.legis.state.tx.us/Docs/GV/htm/GV.2306.htm>

- c. U.S. Department of Housing and Urban Development (HUD) Program Regulations
24 CFR Part 92 ([HOME Investment Partnerships Program Final Rule](#))
24 CFR Part 93 ([Housing Trust Fund Interim Rule](#))

- d. Fair Housing

Federal Fair Housing Act, 42 U.S.C. 3601-19

<https://www.tdhca.state.tx.us/fair-housing/index.htm>

- e. Other Federal laws and regulations that may apply depending on funding source:

Environmental Compliance

All federal sources must have some type of environmental review in accordance with 24 CFR Part 93 or 24 CFR Part 58 as applicable.

<https://www.tdhca.state.tx.us/program-services/environmental/index.htm>

Minimizing Resident Displacement

All federal sources must follow the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970; HOME and NSP1 PI must follow Section 104(d) of Housing and Community Development Act of 1974; and all federal sources must follow the HUD Handbook 1378.

<https://www.tdhca.state.tx.us/program-services/ura/index.htm>

Labor Standards

HOME and NSP1 PI funds are regulated by Davis-Bacon and Related Labor Acts (40 U.S.C. §3141-3144 and 3146-3148, 24 CFR §92.354, and HUD Handbook Federal Labor Standards Compliance in Housing and Community Development Programs).

<https://www.tdhca.state.tx.us/program-services/davis-bacon/index.htm>

Employment Opportunities

HOME and NSP1 PI require compliance with 24 CFR Part 135 (Section 3).

<https://www.tdhca.state.tx.us/program-services/hud-section-3/index.htm>

If HOME or NHTF funds are awarded and Federal regulations or subsequent guidance imposes additional requirements, such Federal regulations or guidance shall govern.

- f. An award to a Development that proposes to refinance with minimal rehabilitation, or to obtain supplemental financing, will not be made in amount that exceeds the amount necessary to replace lost funding or maintain the anticipated levels of feasibility in the original Application, as determined by the Board.

2) **b. Soft Repayment Set-Aside.** \$12,509,857.20 in NHTF is available in this Set-Aside. Applicants within this Set-Aside must restrict rent and income for all Direct Loan-assisted units to 30% as defined in 24 CFR Part 93. Applicants in this Set-Aside must meet the Supportive Housing requirements in 10 TAC §11.1(d)(122) including the underwriting considerations for Supportive Housing Developments in 10 TAC §11.302(g)(4) or the requirements in 10 TAC §13.4(a)(1)(A)(ii).

Set-Aside	Eligible Activities	Fund Source and Amount Available		Maximum Request
CHDO	NC, A/R, R	HOME	\$4,733,439	\$3,000,000
Soft Repayment	A/NC, NC	NHTF	\$12,509,857.20 ²	\$3,000,000
General	NC, A/R, R	HOME	\$9,112,729	\$3,000,000

Key:

NC – New Construction (For the Soft Repayment Set-Aside, New Construction includes Reconstruction, as defined in 24 CFR Part 93)

A/R – Acquisition/Rehabilitation

R – Rehabilitation

A/NC – Acquisition/New Construction

² Because the Department has not yet met its federal commitment deadline for the 2018 or 2019 NHTF funds, the Department will condition all NHTF awards under this NOFA, that the award of NHTF funds may be proportionally reduced or terminated if the Department and Applicant are unable to enter into a Contract by a specific date listed in the Board approval, despite any other deadlines existing in the Texas Administrative Code.

1k

BOARD ACTION REQUEST
BOND FINANCE DIVISION
MAY 21, 2020

Presentation, discussion, and possible action on Inducement Resolution No. 20-018 for Multifamily Housing Revenue Bonds Regarding Authorization for Filing Applications for Private Activity Bond Authority

RECOMMENDED ACTION

WHEREAS, two bond pre-applications, as further detailed below, were submitted to the Department for consideration of an inducement resolution;

WHEREAS, Board approval of the inducement resolution is the first step in the application process for a multifamily bond issuance by the Department; and

WHEREAS, approval of the inducement will allow staff to submit an application to the Bond Review Board (BRB) for the issuance of a Certificate of Reservation associated with the Development;

NOW, therefore, it is hereby

RESOLVED, that based on the foregoing, Inducement Resolution No. 20-018 to proceed with the application submission to the BRB for possible receipt of State Volume Cap issuance authority under the Private Activity Bond Program for the pre-applications listed herein, is hereby approved in the form presented to this meeting.

BACKGROUND

General Information: The BRB administers the annual private activity bond authority for the State of Texas. The Department is an issuer of Private Activity Bonds and is required to induce an application for bonds prior to the submission to the BRB. Approval of the inducement resolution does not constitute approval of the development but merely allows the Applicant the opportunity to move into the full application phase of the process. Once the application receives a Certificate of Reservation, the Applicant has 180 days to close on the private activity bonds.

During the 180-day process, the Department will review the complete application for compliance with the Department's Rules, including, but not limited to, site eligibility and threshold as well as previous participation as it relates to developments previously funded through the Department. During the review of the full application, staff will also underwrite the transaction and determine financial feasibility in accordance with the Real Estate Analysis Rules. The Department will schedule and conduct a public hearing, and the complete application, including a transcript from the hearing, will then be

presented to the Board for a decision on the issuance of bonds as well as a determination on the amount of housing tax credits anticipated to be allocated to the development. This inducement resolution would reserve approximately \$85,000,000 in private activity bond volume cap. Staff notes that the Department's set-aside of \$159,839,794 for the 2020 program year has been met, in addition to \$69,000,000 from 2019 Carryforward, bringing the total in reserved applications to \$228,800,000 for 2020. The pre-applications listed below will be placed on the Department's waiting list to receive a Reservation.

20610 – Terrace at Southern Oaks

New Construction of 300 units is proposed for this multifamily development to be located on Southern Oaks Blvd in Dallas, Dallas County. The applicant has disclosed Neighborhood Risk Factors (NRF) involving the poverty rate and violent crime rate associated with the census tract containing the proposed development, but have been unable to assemble adequate mitigation documentation because the local Governing body is focusing on responding to COVID-19. Regarding the poverty rate NRF, applicant has indicated that they will provide, as part of the full application, mitigation in the form of a resolution from the local Governing Body acknowledging the high poverty rate and authorizing the Development to move forward, which is acceptable mitigation under 10 TAC §11.101(a)(3)(D)(i). For the violent crime NRF, applicant has indicated that they will provide mitigation as part of the full application. Staff notes that clearance of any NRF is not a requirement at the time of pre-application and while Board action today is to approve the inducement resolution, it is simply to allow the applicant the ability to move forward with a full application and a determination regarding eligibility, despite the NRF, will be made at the time of full application. This transaction is proposed to be Priority 3 and will serve the general population. All 300 units will be rent and income restricted at 60% of Area Median Family Income (AMFI). The Department has not received any letters of support or opposition for this development.

Bond Inducement Amount: \$45,000,000

20613 – Riverside Senior Living

New construction of 264 units is proposed for this multifamily development to be located at 8101 North Riverside Drive in Fort Worth, Tarrant County. This transaction is proposed to be Priority 3 and will serve the elderly population. All 264 units will be rent and income restricted at 60% of AMFI. The Department has not received any letters of opposition or support for this development.

Bond Inducement Amount: \$40,000,000

RESOLUTION NO. 20-018

RESOLUTION DECLARING INTENT TO ISSUE MULTIFAMILY REVENUE BONDS OR NOTES WITH RESPECT TO RESIDENTIAL RENTAL DEVELOPMENTS; AUTHORIZING THE FILING OF ONE OR MORE APPLICATIONS FOR ALLOCATION OF PRIVATE ACTIVITY BONDS WITH THE TEXAS BOND REVIEW BOARD; AND AUTHORIZING OTHER ACTION RELATED THERETO

WHEREAS, the Texas Department of Housing and Community Affairs (the “Department”) has been duly created and organized pursuant to and in accordance with the provisions of Chapter 2306, Texas Government Code, as amended, (the “Act”) for the purpose, among others, of providing a means of financing the costs of residential ownership, development and rehabilitation that will provide decent, safe, and affordable living environments for persons and families of low, very low and extremely low income and families of moderate income (all as defined in the Act); and

WHEREAS, the Act authorizes the Department: (a) to make mortgage loans to housing sponsors to provide financing for multifamily residential rental housing in the State of Texas (the “State”) intended to be occupied by persons and families of low, very low and extremely low income and families of moderate income, as determined by the Department; (b) to issue its revenue bonds or notes for the purpose, among others, of obtaining funds to make such loans and provide financing, to establish necessary reserve funds and to pay administrative and other costs incurred in connection with the issuance of such bonds or notes; and (c) to pledge all or any part of the revenues, receipts or resources of the Department, including the revenues and receipts to be received by the Department from such multifamily residential rental development loans, and to mortgage, pledge or grant security interests in such loans or other property of the Department in order to secure the payment of the principal or redemption price of and interest on such bonds or notes; and

WHEREAS, it is proposed that the Department issue its revenue bonds or notes in one or more series for the purpose of providing financing for the multifamily residential rental developments (the “Developments”) more fully described in Exhibit A attached hereto. The ownership of the Developments as more fully described in Exhibit A will consist of the applicable ownership entity and its principals or a related person (the “Owners”) within the meaning of the Internal Revenue Code of 1986, as amended (the “Code”); and

WHEREAS, the Owners have made not more than 60 days prior to the date hereof, payments with respect to the acquisition, construction, reconstruction or renovation of the Developments and expect to make additional payments in the future and desire that they be reimbursed for such payments and other costs associated with the Developments from the proceeds of tax-exempt and taxable, as applicable, obligations to be issued by the Department subsequent to the date hereof; and

WHEREAS, the Owners have indicated their willingness to enter into contractual arrangements with the Department providing assurance satisfactory to the Department that the requirements of the Act and the Department will be satisfied and that the Developments will satisfy State law, Section 142(d) and other applicable Sections of the Code and Treasury Regulations; and

WHEREAS, the Department desires to reimburse the Owners for some or all of the costs associated with the Developments listed on Exhibit A attached hereto, but solely from and to the extent, if any, of the proceeds of tax-exempt and taxable, as applicable, obligations to be issued in one or more series to be issued subsequent to the date hereof; and

WHEREAS, at the request of the Owners, the Department reasonably expects to incur debt in the form of tax-exempt and taxable, as applicable, obligations for purposes of paying the costs of the Developments described on Exhibit A attached hereto; and

WHEREAS, in connection with the proposed issuance of the Bonds (defined below), the Department, as issuer of the Bonds, is required to submit for the Developments one or more Applications for Allocation of Private Activity Bonds or Applications for Carryforward for Private Activity Bonds (the "Application") with the Texas Bond Review Board (the "Bond Review Board") with respect to the tax-exempt Bonds to qualify for the Bond Review Board's Allocation Program in connection with the Bond Review Board's authority to administer the allocation of the authority of the State to issue private activity bonds; and

WHEREAS, the Governing Board of the Department (the "Board") has determined to declare its intent to issue its multifamily revenue bonds or notes for the purpose of providing funds to the Owners to finance the Developments on the terms and conditions hereinafter set forth; NOW, THEREFORE,

BE IT RESOLVED BY THE GOVERNING BOARD OF THE TEXAS DEPARTMENT OF HOUSING AND COMMUNITY AFFAIRS THAT:

ARTICLE 1

OFFICIAL INTENT; APPROVAL OF CERTAIN ACTIONS

Section 1.1. Authorization of Issue. The Department declares its intent to issue its Multifamily Housing Revenue Bonds or Notes (the "Bonds") in one or more series and in amounts estimated to be sufficient to (a) fund a loan or loans to the Owners to provide financing for the respective Developments in an aggregate principal amount not to exceed those amounts, corresponding to the Developments, set forth in Exhibit A; (b) fund a reserve fund with respect to the Bonds if needed; and (c) pay certain costs incurred in connection with the issuance of the Bonds. Such Bonds will be issued as qualified residential rental development bonds. Final approval of the Department to issue the Bonds shall be subject to: (i) the review by the Department's credit underwriters for financial feasibility; (ii) review by the Department's staff and legal counsel of compliance with federal income tax regulations and State law requirements

regarding tenancy in the respective Development; (iii) approval by the Bond Review Board, if required; (iv) approval by the Attorney General of the State of Texas (the “Attorney General”); (v) satisfaction of the Board that the respective Development meets the Department’s public policy criteria; and (vi) the ability of the Department to issue such Bonds in compliance with all federal and State laws applicable to the issuance of such Bonds.

Section 1.2. Terms of Bonds. The proposed Bonds shall be issuable only as fully registered bonds or notes in authorized denominations to be determined by the Department; shall bear interest at a rate or rates to be determined by the Department; shall mature at a time to be determined by the Department but in no event later than 40 years after the date of issuance; and shall be subject to prior redemption upon such terms and conditions as may be determined by the Department.

Section 1.3. Reimbursement. The Department reasonably expects to reimburse the Owners for all or a portion of the costs that have been or will be paid subsequent to the date that is 60 days prior to the date hereof in connection with the acquisition of real property and construction, reconstruction or renovation, as applicable, of its Development and listed on Exhibit A attached hereto (“Costs of the Developments”) from the proceeds of the Bonds, in an amount which is reasonably estimated to be sufficient: (a) to fund a loan to provide financing for the acquisition and construction or rehabilitation and equipping of its Development, including reimbursing the applicable Owner for all costs that have been or will be paid subsequent to the date that is 60 days prior to the date hereof in connection with the acquisition and construction or rehabilitation of the Developments; (b) to fund certain reserves that may be required for the benefit of the holders of the Bonds; and (c) to pay certain costs incurred in connection with the issuance of the Bonds.

Section 1.4. Principal Amount. Based on representations of the Owners, the Department reasonably expects that the maximum aggregate principal amount of debt issued to reimburse the Owners for the Costs of the Developments will not exceed the amount set forth in Exhibit A which corresponds to the applicable Development.

Section 1.5. Limited Obligations. The Owners may commence with the acquisition and construction or rehabilitation of the Developments, which Developments will be in furtherance of the public purposes of the Department as aforesaid. On or prior to the issuance of the Bonds, each Owner will enter into a loan agreement, on terms agreed to by the parties, on an installment payment basis with the Department under which the Department will make a loan to the applicable Owner for the purpose of reimbursing the Owner for the Costs of the Development and the Owner will make installment payments sufficient to pay the principal of and any premium and interest on the applicable Bonds. The proposed Bonds shall be special, limited obligations of the Department payable solely by the Department from or in connection with its loan or loans to the Owner to provide financing for its Development, and from such other revenues, receipts and resources of the Department as may be expressly pledged by the Department to secure the payment of the Bonds.

Section 1.6. The Developments. Substantially all of the proceeds of the Bonds shall be used to finance the Developments, which are to be occupied entirely by Eligible Tenants, as determined by the Department, and which are to be occupied partially by persons and families of low income such that the requirements of Section 142(d) of the Code are met for the period required by the Code.

Section 1.7. Payment of Bonds. The payment of the principal of and any premium and interest on the Bonds shall be made solely from moneys realized from the loan of the proceeds of the Bonds to reimburse the Owners for costs of its Development.

Section 1.8. Costs of Developments. The Costs of the Developments may include any cost of acquiring, constructing, rehabilitating, or reconstructing, as applicable, improving, equipping, installing and expanding the Developments. Without limiting the generality of the foregoing, the Costs of the Developments shall specifically include the cost of the acquisition of all land, rights-of-way, property rights, easements and interests, the cost of all machinery and equipment, financing charges, inventory, raw materials and other supplies, research and development costs, interest prior to and during construction and for one year after completion of construction whether or not capitalized, necessary reserve funds, the cost of estimates and of engineering and legal services, plans, specifications, surveys, estimates of cost and of revenue, other expenses necessary or incident to determining the feasibility and practicability of acquiring, constructing, reconstructing, improving and expanding the Developments, administrative expenses and such other expenses as may be necessary or incident to the acquisition, construction, reconstruction, improvement and expansion of the Developments, the placing of the Developments in operation and that satisfy the Code and the Act. The Owners shall be responsible for and pay any costs of its Development incurred by it prior to issuance of the Bonds and will pay all costs of its Development which are not or cannot be paid or reimbursed from the proceeds of the Bonds.

Section 1.9. No Commitment to Issue Bonds. Neither the Owners nor any other party is entitled to rely on this Resolution as a commitment to issue the Bonds and to loan funds, and the Department reserves the right not to issue the Bonds either with or without cause and with or without notice, and in such event the Department shall not be subject to any liability or damages of any nature. Neither the Owners nor any one claiming by, through or under the Owners shall have any claim against the Department whatsoever as a result of any decision by the Department not to issue the Bonds.

Section 1.10. Conditions Precedent. The issuance of the Bonds following final approval by the Board shall be further subject to, among other things: (a) the execution by the Owners and the Department of contractual arrangements, on terms agreed to by the parties, providing assurance satisfactory to the Department that all requirements of the Act will be satisfied and that the Development will satisfy the requirements of Section 142(d) of the Code (except for portions to be financed with taxable bonds or notes); (b) the receipt of an opinion from Bracewell LLP or other nationally recognized bond counsel acceptable to the Department (“Bond Counsel”), substantially to the effect that the interest on the tax-exempt Bonds is excludable

from gross income for federal income tax purposes under existing law; and (c) receipt of the approval of the Bond Review Board, if required, and the Attorney General.

Section 1.11. Authorization to Proceed. The Board hereby authorizes staff, Bond Counsel and other consultants to proceed with preparation of the Developments' necessary review and legal documentation for the filing of one or more Applications and the issuance of the Bonds, subject to satisfaction of the conditions specified in this Resolution. The Board further authorizes staff, Bond Counsel and other consultants to re-submit an Application that was withdrawn by an Owner.

Section 1.12. Related Persons. The Department acknowledges that financing of all or any part of the Developments may be undertaken by any company or partnership that is a "related person" to the respective Owner within the meaning of the Code and applicable regulations promulgated pursuant thereto, including any entity controlled by or affiliated with the Owners.

Section 1.13. Declaration of Official Intent. This Resolution constitutes the Department's official intent for expenditures on Costs of the Developments which will be reimbursed out of the issuance of the Bonds within the meaning of Sections 1.142-4(b) and 1.150-2, Title 26, Code of Federal Regulations, as amended, and applicable rulings of the Internal Revenue Service thereunder, to the end that the Bonds issued to reimburse Costs of the Developments may qualify for the exemption provisions of Section 142 of the Code, and that the interest on the Bonds (except for any taxable Bonds) will therefore be excludable from the gross incomes of the holders thereof under the provisions of Section 103(a)(1) of the Code.

Section 1.14. Execution and Delivery of Documents. The Authorized Representatives named in this Resolution are each hereby authorized to execute and deliver all Applications, certificates, documents, instruments, letters, notices, written requests and other papers, whether or not mentioned herein, as may be necessary or convenient to carry out or assist in carrying out the purposes of this Resolution.

Section 1.15. Authorized Representatives. The following persons are hereby named as authorized representatives of the Department for purposes of executing, attesting, affixing the Department's seal to, and delivering the documents and instruments and taking the other actions referred to in this Article 1: the Chair or Vice Chair of the Board, the Executive Director or Acting Director of the Department, the Director of Administration of the Department, the Director of Bond Finance and Chief Investment Officer of the Department, the Director of Multifamily Bonds, the Director of Texas Homeownership of the Department and the Secretary or any Assistant Secretary to the Board. Such persons are referred to herein collectively as the "Authorized Representatives." Any one of the Authorized Representatives is authorized to act individually as set forth in this Resolution.

ARTICLE 2

CERTAIN FINDINGS AND DETERMINATIONS

Section 2.1. Certain Findings Regarding Developments and Owners. The Board finds that:

- (a) the Developments are necessary to provide decent, safe and sanitary housing at rentals that individuals or families of low and very low income and families of moderate income can afford;
- (b) the Owners will supply, in their Development, well-planned and well-designed housing for individuals or families of low and very low income and families of moderate income;
- (c) the Owners are financially responsible;
- (d) the financing of the Developments is a public purpose and will provide a public benefit; and
- (e) the Developments will be undertaken within the authority granted by the Act to the Department and the Owners.

Section 2.2. No Indebtedness of Certain Entities. The Board hereby finds, determines, recites and declares that the Bonds shall not constitute an indebtedness, liability, general, special or moral obligation or pledge or loan of the faith or credit or taxing power of the State, the Department or any other political subdivision or municipal or political corporation or governmental unit, nor shall the Bonds ever be deemed to be an obligation or agreement of any officer, director, agent or employee of the Department in his or her individual capacity, and none of such persons shall be subject to any personal liability by reason of the issuance of the Bonds. The Bonds will be a special limited obligation of the Department payable solely from amounts pledged for that purpose under the financing documents.

Section 2.3. Certain Findings with Respect to the Bonds. The Board hereby finds, determines, recites and declares that the issuance of the Bonds to provide financing for the Developments will promote the public purposes set forth in the Act, including, without limitation, assisting persons and families of low and very low income and families of moderate income to obtain decent, safe and sanitary housing at rentals they can afford.

ARTICLE 3

GENERAL PROVISIONS

Section 3.1. Books and Records. The Board hereby directs this Resolution to be made a part of the Department's books and records that are available for inspection by the general public.

Section 3.2. Notice of Meeting. This Resolution was considered and adopted at a meeting of the Board that was noticed, convened, and conducted in full compliance with the Texas Open Meetings Act, Chapter 551 of the Texas Government Code, and with §2306.032 of the Texas Government Code, regarding meetings of the Board.

Section 3.3. Effective Date. This Resolution shall be in full force and effect from and upon its adoption.

PASSED AND APPROVED this 21st day of May, 2020.

EXHIBIT "A"

Descriptions of the Owners and the Developments

Project Name	Owner	Principals	Amount Not to Exceed
The Terrace at Southern Oaks	LDG The Terrace at Southern Oaks, LP, a Texas limited partnership	General Partner/Member: LDG The Terrace at Southern Oaks GP, LLC, a Texas limited liability company	\$45,000,000
Costs: Acquisition/construction of a 300-unit affordable, multifamily housing development to be known as The Terrace at Southern Oaks Apartments, located on Southern Oaks Boulevard, Dallas, Dallas County, Texas 75216			

Project Name	Owner	Principals	Amount Not to Exceed
Legacy Riverside Senior Living Community	TX Riverside Seniors, LP, a Texas limited partnership	General Partner/Member: TX Riverside Seniors GP, LLC, a Texas limited liability company	\$40,000,000
Costs: Acquisition/construction of a 264-unit affordable, multifamily housing development to be known as Legacy Riverside Senior Living Community, located at the northeast corner of Summerfields Blvd and North Riverside Drive, Fort Worth, Tarrant County, Texas 76137			

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BOARD ACTION REQUEST
HOUSING RESOURCE CENTER
MAY 21, 2020

Presentation, discussion, and possible action on the ratification of a substantial amendment of the 2019 State of Texas Consolidated Plan: One-Year Action Plan

RECOMMENDED ACTION

WHEREAS, the U.S. Department of Housing and Urban Development (HUD) requires the submission of a One-Year Action Plan in accordance with 24 CFR §91.320;

WHEREAS, the final 2019 State of Texas Consolidated Plan: One-Year Action Plan (Plan), which reports on the intended use of funds received by the State of Texas from HUD for Program Year (PY) 2019, beginning on February 1, 2019, and ending on August 31, 2020, was approved for submission to HUD at the Board meeting of May 23, 2019, and the Plan was submitted to HUD on June 7, 2019;

WHEREAS, as directed by HUD as a prerequisite for receiving a grant agreement from HUD for Emergency Solutions Grant CARES Act funds (ESG-CV), staff has developed a substantial amendment to the Plan, in accordance with waivers from HUD, to allow for an expedited citizen participation process to add the necessary changes required to receive and administer ESG-CV funding designated to the State through the CARES Act;

WHEREAS, the substantial amendment was submitted to HUD May 8, 2020; and

WHEREAS, at the meeting of the Board on April 23, 2020, staff shared with the Board that if an amendment to the HUD Action or Consolidated Plan was needed, staff could submit such a substantial amendment to HUD in line with the programming contemplated in the April Board action, but would not take any contractual action under that substantial amendment until the Board had so ratified the plan amendment;

NOW, therefore, it is hereby

RESOLVED, that the substantial amendment to the Plan, in the form presented to this meeting, is hereby ratified.

BACKGROUND

TDHCA has prepared a substantial amendment of the 2019 State of Texas Consolidated Plan: One-Year Action Plan (Plan) as directed by guidance provided by HUD. TDHCA submitted a substantial amendment of the Plan to HUD in writing through HUD's Integrated Disbursement and Information System (IDIS). The substantial amendment of the Plan has also been posted to the TDHCA webpage at <http://www.tdhca.state.tx.us/housing-center/pubs-plans.htm>.

The purpose of the substantial amendment is to add detail to the Plan that will prompt HUD to issue a grant agreement for the ESG-CV funds allocated to the state through the CARES Act, thereby allowing TDHCA to accept and award funding following the plan approved by the Board in April 2020.

Staff is bringing this item to seek ratification from the board, as noted in the Board Action Request for Item 7d from the meeting of April 23, 2020: "At this time the Department does not believe a material amendment to a HUD Action or Consolidated Plan is needed, but if it is determined that it is needed, the Department may in order to contract these funds quickly submit a substantial amendment to HUD (in accordance with the CARES Act and HUD waiver flexibilities) in line with this programming action without Board Approval, but will not take any contractual action under that substantial amendment before Board ratification."

This action seeks ratification of the submitted substantial amendment of the 2019 One-Year Action Plan to HUD. Staff recommends approval of this action.

See below for the Amendment submitted to HUD in IDIS.



Texas Department of Housing and Community Affairs

Amendments to the 2019 State of Texas Consolidated Plan One Year Action Plan

May 7, 2020

The amendment reflects only those sections within which changes have been made. All other sections remain unchanged.

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

1. Agency/entity responsible for preparing/administering the Consolidated Plan

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
HTF Administrator	TEXAS	Texas Department of Housing and Community Affairs
ESG and ESG-CV Administrator	TEXAS	Texas Department of Housing and Community Affairs
CDBG-CV Administrator	TEXAS	Texas Department of Housing and Community Affairs

Table 1 – Responsible Agencies

Narrative

TDHCA administers the ESG, ESG-CV, NHTF, CDBG-CV (Phase I) and the HOME Programs; TDA administers the CDBG Program; and DSHS administers the HOPWA Program. All of these programs,

known collectively as CPD Programs, are covered in the 2019 OYAP. TDHCA coordinates development of the OYAP among itself, TDA, and DSHS.

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.

At that time the CDBG Program was transferred from TDHCA to the newly-created Office of Rural Community Affairs, later called the Texas Department of Rural Affairs, and was then subsequently moved to TDA. 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 Colonia Self Help Centers (SHCs) along the Texas-Mexico border.

DSHS, which administers HOPWA, is an agency of Texas Health and Human Services (HHS). In 2015, HHS began a reorganization to produce a more efficient, effective, and responsive system. In September of 2016, the first phase of that effort became operational, and a second phase occurred September 1, 2017. The goals of the transformation were to create a system that is easier to navigate for people who need information, benefits, or services; aligns with the HHS mission, business, and statutory responsibilities; breaks down operational silos to create greater program integration; creates clear lines of accountability within the organization; and develops clearly defined and objective performance metrics for all areas of the organization. Foremost as it relates to HOPWA, DSHS contract oversight and support functions have transferred to HHS. For more information about the HHSC transformation, visit <https://hhs.texas.gov/about-hhs/hhs-transformation>.

On March 12, 2016, TDHCA was designated by Governor Abbott as the state agency responsible for the administration of funds provided through the NHTF.

TDHCA, TDA, and DSHS administer their assigned CPD programs and services through a network of organizations across Texas and do not typically fund assistance to 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).

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

Anticipated Resources (only added row shown)

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG CV – Other	Public-federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	33,254,679	0	0	33,254,679	33,254,679	<p>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.</p> <p>HHSP is Texas state general revenue funding for the largest cities to provide flexibility to undertake activities that complement ESG activities. Note that not all ESG direct recipients in Texas are HHSP grantees. Use of funds also includes Administration. The EH Fund, projected to accrue approximately \$140,000 per year, provides funds to counties and municipalities to combat homelessness.</p>

Table 2 - Expected Resources – Priority Table

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.

ESG-CV

ESG CV funds do not include a match requirement, but the funds are anticipated to be leveraged with funds from HHSP and the EH fund.

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.

Executive Summary

AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

The State is committed to reaching out to and engaging with the public in order to develop programmatic activities that are responsive to the various affordable housing needs of Texans. The State also solicits and receives input from governmental bodies, nonprofits, and community and faith-based groups. More information on the citizen participation, consultation, and public comment are included in the Consultation and Participation sections of the Plan.

The 2015-2019 Consolidated Plan (as adopted) substantial amendments, the OYAP, and the Consolidated Plan Annual Performance and Evaluation Report (CAPER) are available to the public online at <http://www.tdhca.state.tx.us> and materials are accessible to persons with disabilities, upon request.

The State recognizes that public participation and consultation are ongoing processes. During the development of the 2015-2019 Consolidated Plan, comprehensive outreach was conducted to gather input. This outreach continues through the development of each Annual Action Plan within the 5-year consolidated planning process. Following the release of HUD's Final Rule to Affirmatively Further Fair Housing (AFFH), the State updated the Citizen Participation Plan and Language Access Plan; those updated plans are now being used as the State develops an updated Analysis of Impediments to Fair Housing Choice (AI).

For the ESG-CV Phase I funding the State requested a waiver of the citizen participation process. However, TDHCA held a series of online consultation opportunities with COCs, current ESG Subrecipients, and other stakeholders to gather input on ESG-CV program design. While the substantial amendment was not formally released for public comment, the activities in the amendment were posted for the public to review and orally described at a TDHCA Board Meeting on April 23, 2020, with an opportunity for public comment. There was no public comment.

Expected Resources

AP-15 Expected Resources – 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% Housing Tax Credit (HTC)/Private Activity Bond (PAB) Program, 9% HTC Program, Multifamily Direct Loan Program, Homeless and Housing Services Program (HHSP), State Ending Homelessness Fund (EH Fund), State Housing Trust Fund Program, Texas Mortgage Credit Certificate (TX 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 (Section 811 PRA) Program and Tax Credit Assistance Program Repayment Funds (TCAP RF).

The expected future funding amounts of the above programs, 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 inform TDHCA 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 to serve all Texans efficiently and effectively. TDHCA's committee involvement promotes identification and pursuit of 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 pre-determined counties.

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 Tex. Gov't 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 nine state agencies. TDHCA, as the primary source for state homelessness funding, provides administrative and planning support to the TICH.

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

As noted in AP-05 the HUD Program Year (PY) used by the state of Texas' Community Planning and Development Programs (CPD) will be changing from a February – January cycle to a September – August cycle. The purpose of this change is to align with State Fiscal year reporting, and the recent timeframe of the Congressional Appropriations process. To accomplish this change, Texas will lengthen its PY 2019 by even months, running from February 1, 2019, through August 31, 2020.

Anticipated Resources (only added row shown)

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG CV – Other	Public-federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	33,254,679	0	0	33,254,679	33,254,679	<p>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.</p> <p>HHSP is Texas state general revenue funding for the largest cities to provide flexibility to undertake activities that complement ESG activities. Note that not all ESG direct recipients in Texas are HHSP grantees. Use of funds also includes Administration. The EH Fund, projected to accrue approximately \$140,000 per year, provides funds to counties and municipalities to combat homelessness.</p>

Table 3 - 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

HOME multifamily development is often used to leverage with the HTC Program, which authorizes 9% low-income housing tax credits of \$2.70 per capita for each state, and 4% HTC in amounts linked to the usage of the state's cap for issuance of tax exempt PABs to finance affordable housing development. In Texas, this equates to approximately \$76,700,000 in 9% tax credits available to be awarded annually. These credits may be claimed each year for ten years and represents potential tax credit value on the magnitude of \$767,000,000. The credits are syndicated to limited partner investors to yield cash for use in eligible development activities. Currently typical syndication rates range between 88% and 92%. TDHCA's Qualified Allocation Plan (QAP) identifies the criteria used for selection of eligible developments to provide housing for low-income tenants. HOME provides increased leverage, allowing property owners to utilize fewer tax credits and less private debt and local funding, thus providing more efficient use of resources. Other leveraging sources may include United States Department of Agriculture (USDA) operating subsidies and loans, and conventional and FHA-insured loans. Match requirements for the HOME Multifamily Direct Loan Program will in part be met through Rules that establish awardees' minimum amount of match as 5% of the award amount. In addition to match provided as part of the developer's obligation, TCAP RF may be utilized as HOME match, and THDCA calculates to below market interest rates on eligible loans provided to the HOME development which is included in the match funds reported in the CAPER. TDHCA requires Subrecipients and state recipients to provide match of up to 15% of the project hard costs for some single family activities.

ESG

To meet the ESG match requirement, TDHCA includes the provision of evidence of proposed match as part of the ESG application process. TDHCA awards additional points to applicants that commit to provide match in excess of the requirements. Subrecipients that also administer HHSP funds or funds from the EH Fund may utilize those funds as match for ESG if they are otherwise eligible to be counted as match.

HOPWA

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. Texas is not required to match the HOPWA formula award.

ESG-CV

ESG CV funds do not include a match requirement, but the funds are anticipated to be leveraged with funds from HHSP and the EH fund.

Due to IDIS character limits, CDBG and NHTF Leveraging is described in the question below.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives – 91.320(c)(3)&(e)

Goals Summary Information *(only revised row shown)*

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	Emergency shelter and transitional housing Homelessness Prevention Rapid Re-housing	ESG: \$9,127,824 ESG-CV: \$33,254,679	Tenant-based rental assistance / Rapid Rehousing: 4,173 Households Assisted Overnight/Emergency Shelter/Transitional Housing Beds added: 50,593 Beds Homelessness Prevention: 13,998 Persons Assisted

Table 4 – Goals Summary

Goal Descriptions *(only revised row shown)*

1	Goal Name	Homeless Goals
	Goal Description	<p>Funds will be utilized to provide Administration, HMIS services, emergency shelter, rapid re-housing, homeless prevention and street outreach to eligible persons who are experiencing homelessness or at-risk of homelessness, as defined by the applicable program rule or act. Actual funding amounts will be determined based on applications for funding received, which are prioritized in part by the recommendation provided by the applicable CoC. The estimates for the funding amount per activity type and number of persons served are extrapolated from data collected over the prior three years. Regardless of the CoC recommendations, TDHCA limits the amount of funding available for street outreach and emergency shelter to not more than 60% of the total ESG funding available for the regular allocation of 2019 ESG funds, but the ESG-CV funds are not limited by this cap and it will not be applied to this funding source. Likewise, funds for administration and HMIS are limited within the TDHCA allocation to ensure that the applicable regulatory or statutory caps for these expenditures are not exceeded.</p>

AP-35 Projects – (Optional)

Introduction:

Per the IDIS Desk Guide, Project-level detail is not required for a state grantee’s Annual Action Plan. Once a state grantee has allocated funding via its Method of Distribution, the state grantee will use the Projects sub-menu in IDIS Online to add its projects for the program year. However, in order for accomplishments to associate to the goals listed in the plan, projects must be entered in the Action Plan template. Although not typically required, Texas is amending the Action Plan to include the initial allocation of ESG-CV funding. This does require that the ESG funds programmed in this plan are included in the AP-35 as separate ESG projects as outlined in this section.

TDHCA will receive \$9,127,824 in ESG under the 2019 allocation, outlined as ESG19 Texas. TDHCA has been allocated an additional \$33,254,679 in 2020 ESG funds under the CARES Act, outlined as ESG20 Texas for the purposes of this plan, and the use of these funds is further described below.

#	Project Name
1	ESG20 Texas

Table 5 – Project Information

Goal Outcome Indicator Info by allocation:

Goal	Goal Outcome Indicator	ESG20 Texas
1	Tenant-based rental assistance / Rapid Rehousing	3,255
1	Households Assisted Overnight/Emergency Shelter/Transitional Housing Beds added	39,461
1	Homelessness Prevention	10,918
	Total Persons Assisted	53,634

Description

ESG does not have funding allocation priorities for special needs populations. The ESG20 Texas project outlined in the Action Plan includes funds allocated to TDHCA though the first allocation under the CARES Act. A portion of the funds will be utilized by TDHCA for administration, and the remainder will be distributed to entities providing street outreach, emergency shelter, rapid rehousing, and homeless prevention to eligible households, in addition to funding eligible HMIS activities. Funds may be set-aside for the provision of legal services allowable under the

ESG regulations, as the need for legal services to obtain or maintain housing is anticipated to exceed regularly occurring expenses due to the pandemic. TDHCA will contract these funds to private nonprofit organizations, cities, and counties in the State of Texas to provide the services necessary to help persons who are experiencing or at-risk of homelessness quickly regain stability in permanent housing, with particular emphasis of mitigating the impacts of COVID-19. A portion of the funding is allocated to each CoC based on an allocation formula that includes population and other data as described in the State ESG rules. Award authority for all ESG funds remains with TDHCA's Board, and TDHCA contracts directly with all subrecipients regardless of method of application. TDHCA retains the right to adjust awards in relation to the amount of funding received. Threshold requirements for receipt of an award include current status of required single audits and submission of an audit certification form; information necessary to conduct a previous participation review, and documentation sufficient to determine that the subrecipient has adequate capacity to administer the ESG funds. TDHCA has elected to subgrant the first allocation of ESG20 funds through a process that is not competitive, but builds on existing networks and organizational capacity. ESG20 funds may be used for six program components: street outreach, emergency shelter, homelessness prevention, rapid re-housing assistance, HMIS or HMIS-comparable database, and administrative activities. In order to expedite response, a portion of the ESG20 funds will be allocated to existing subrecipients of ESG19, and a portion will be made available to each CoC region based a regional allocation formula. A CoC lead agency may elect to select the subrecipients of ESG20 funding based on the needs and priorities of the CoC in responding to COVID-19, and TDHCA will review their selections and, if the entity is an eligible subrecipient, contract directly with the selected entity. ESG20 funds that are not distributed in either of these manners may be selected by TDHCA to provide one or more of the six eligible components, and TDHCA may either subgrant or procure providers as it deems necessary to facilitate a rapid response. 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, with a broad distribution of funding to reach as many areas of the state with quality services as possible. The expected outcome of TDHCA's plan to allow local selection is that the same will be accomplished, but with CoC-wide planning rather than with only State planning. As with the ESG19 project, eligible applicant organizations are Units of General Purpose Local Government, including cities, counties and metropolitan cities; urban counties that receive ESG funds directly from HUD; and a consolidation of units of general purpose local governments, like a Council of Governments. Other instrumentalities of a city or county, like a Local Mental Health Authority, may be eligible and should seek guidance determine if they may apply. Governmental organizations such as Public Housing Authorities (PHAs) and housing finance agencies are not eligible. Actions to meeting underserved needs are found in Action Plan Section 85.

CDBG-DR allocation priorities can be found in the CDBG-DR Action Plans at:

<http://recovery.texas.gov/action-plans/index.html>

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/NHTF 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/NHTF 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/NHTF 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 and low-poverty areas, and are not typically minority-concentrated except in majority-minority areas of the state. It also provides competitive 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 11 HUD-designated CoC regions. TDHCA does not provide priorities for allocating investment geographically to areas of minority concentration as described in 24 CFR §91.320(f).

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 (90% in 2017) classified as extremely low and very 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 a disproportionate number of 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. All remaining funds are distributed through state-wide competitions without geographic priorities.
3. Colonia SHCs are established along the Texas-Mexico border in Cameron/Willacy, Hidalgo, Starr, Webb, Maverick, Val Verde, and El Paso counties. The Colonia SHC Program serves approximately 35 colonias in seven border counties, which are comprised of primarily Hispanic households and have concentrations of very low-income households.

NHTF Geographic Priorities description is added to Discussion section text below.

Geographic Distribution

Target Area	Percentage of Funds
State of Texas	100

Table 6 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

HOME Addresses Geographic Investments

HOME funds are allocated geographically using a regional allocation formula (RAF), as described in Strategic Plan Section 10. This process directs funds to areas of the State that demonstrate high need. At least 95% of TDHCA-administered HOME funds are used in areas that are not Participating Jurisdictions (PJs) per statute. This results in more HOME funds in smaller communities than in larger Metropolitan Statistical Areas (MSAs) that receive HOME funds directly from HUD. The current RAF is online at <http://www.tdhca.state.tx.us/housing-center/pubs-plans.htm>.

ESG Addresses Geographic Investments

ESG allocates the majority of ESG and ESG-CV funds to each CoC region based on an allocation formula. This formula includes factors such as homeless population, people living in poverty, cost

burden of renters, point in time counts and ESG funds available from federal and state sources.

HOPWA Addresses Geographic Investments

At the end of 2016, there were 86,669 people living with HIV in Texas. 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) in MSAs funded directly from HUD for HOPWA. The Texas HOPWA program can operate in any area of the State, but mostly serves 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). 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 Cameron/Willacy, Hidalgo, Starr, Webb, and El Paso counties to address the long history of poverty and lack of institutional resources. In 2001, TDHCA added two additional Colonia SHCs in Maverick and Val Verde counties. These seven counties collectively have approximately 40,180 colonia residents who may qualify to access center services.

NHTF Geographic Investments description is added to Discussion section text below.

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.

NHTF Geographic Priorities

The Texas NHTF will distribute NHTF funds through a competitive NOFA process. The funds will

initially be available geographically, based on the proportion of Extremely Low Income Renter households to the total population of Renter Households in each of thirteen State Service Regions. A minimum will be calculated for each region as a ratio of the available allocation divided by thirteen, and available competitively within each region prior to collapse into a statewide competition.

NHTF Addresses Geographic Investments

NHTF funds are allocated geographically using a Regional Allocation Formula, as described in Strategic Plan Section 10. Acknowledging that all regions of the State have a need to create housing for ELI households, the formula provides opportunity for access to NHTF. This process directs funds to areas of the State that demonstrate high need.

10

BOARD ACTION REQUEST

HOME AND HOMELESSNESS PROGRAMS DIVISION

MAY 21, 2020

Presentation, discussion, and possible action to authorize the issuance of the 2020 Emergency Solutions Grants Program Notice of Funding Availability and publication in the Texas Register

RECOMMENDED ACTION

WHEREAS, the U.S. Department of Housing and Urban Develop has allocated \$9,643,857 in Emergency Solutions Grants (ESG) Program funds to the Texas Department of Housing and Community Affairs (TDHCA or the Department);

WHEREAS, per 24 CFR §576.203(b), states have 24 months in which to expend ESG funds on eligible activities and, which, if not met, could result in the return of funds to the HUD;

WHEREAS, per 10 TAC §7.34, the Department may procure ESG Coordinators to administer a Local Competition for ESG funds within each of the 11 Continuum of Care (CoC) regions, and for the 2020 process two ESG Coordinators have responded to serve in this role;

WHEREAS, the Department wishes to release a Notice of Funding Availability (NOFA) for the ESG Program totaling \$9,209,884 in accordance with the 10 TAC §7.33 concerning an Allocation Formula, retention of \$433,973 by the Department for administrative purposes; and

WHEREAS, the Department will accept Applications from eligible Applicants for CoC regions without an ESG Coordinator;

NOW, therefore, it is hereby

RESOLVED, that the Executive Director and his designees be and each of them hereby are authorized, empowered, and directed, for and on behalf of the Department, to post on the Department's website and to publish a notification in the *Texas Register* a 2020 ESG NOFA for the amount of \$9,209,884, and to make any technical corrections or perform such other acts as may be necessary to effectuate the foregoing.

BACKGROUND

The ESG Program is funded by HUD to assist people to regain stability in permanent housing quickly after experiencing a housing crisis and/or homelessness. ESG funds can be used for the administration of the ESG grant, including utilization of a Homeless Management Information System, rehabilitation or conversion of buildings for use as emergency shelter for persons experiencing homelessness; the payment of certain expenses related to operating emergency shelters; essential services related to emergency shelters and street outreach for persons experiencing homelessness; and homelessness prevention and rapid re-housing assistance.

The Department received notice of an allocation of \$9,643,857 from HUD for its regular allocation of 2020 ESG funds. The Department will retain \$433,973 for administrative purposes. The remaining \$9,209,884 will be made available for awards to Subrecipients through the 2020 ESG NOFA. This allocation is separate and apart from the first round of CARES funding allocated to the Department, for which a plan was presented to the Board on April 26, 2020.

Some of the awards made through the NOFA may be as a result of the recommendations of ESG Coordinators, which are contractors procured to administer a Local Competition on behalf of the Department. Two ESG Coordinators for Local Competitions were procured: the Coalition for the Homeless of Houston/Harris County for CoC Region TX-700, and South Alamo Regional Alliance for the Homeless for CoC Region TX-500. Applicants in these two areas will apply directly to the ESG Coordinator for funds; in all other areas of the state, applicants will respond to TDHCA through the NOFA being approved in this action item.

Federal program rules require the Department to commit all funds within 60 days of receipt of an award letter from HUD; the Department anticipates receipt of this letter during the late summer or fall of 2020. The contract period is subject to receipt of funds from the annual ESG allocation. The Department's anticipated Contract Term for Program Year (PY) 2020 ESG will be November 1, 2020, through October 31, 2021, subject to receipt of adequate funding and any additional terms and conditions from HUD.

Applicants may request up to \$345,000 in ESG funds inclusive of Program Participant services, HMIS, and Administration, per 10 TAC §7.33(d). Applicants must meet the minimum threshold requirements established in 10 TAC §7.36 to be considered for award.

The availability and use of these funds are subject to the Department's rules governing under Title 10, Part 1, Chapter 1, Administration; Chapter 2, Enforcement; and Chapter 7, Homeless Programs, Subchapter A, General Policies and Procedures, and Subchapter C, Emergency Solutions Grants (ESG) of the Texas Administrative Code, which are being adopted as a separate agenda item today. For Units of Local Government, the Uniform Grant Management Standards (UGMS) as outlined in Chapter 783 in the Texas Local Government Code also govern the availability and use of these funds. Federal laws and regulations that apply to these funds include the Homeless Emergency Assistance and Rapid Transition to Housing Act (42 U.S.C. §11302 *et. seq.*), as amended; the HUD regulations codified in 24 Code of Federal Regulations

(CFR) Part 576; 24 CFR Part 58, for environmental requirements; 2 CFR Part 200 for Uniform Administrative Requirements; 24 CFR §135.38 for Section 3 requirements; and 24 CFR Part 5, Subpart A for fair housing.

Details on the award selection process, handling of administrative deficiencies, funding limitations, eligible and ineligible applicants and activities, threshold requirements, award selection criteria, and application submission requirements are included in the NOFA provided with this action item and, upon approval, will be posted to the Department's website with notification of the NOFA posting in the *Texas Register*.

Applications for areas without Local Competitions will be accepted statewide beginning June 12, 2020, at 8:00 a.m. Austin local time, until Friday, June 26, 2020, at 5:00 p.m. Austin local time.



**Emergency Solutions Grants (ESG) Program
CFDA# 14.231**

2020 ESG Competition

Notice of Funding Availability (NOFA)

1) Summary.

- a) The Texas Department of Housing and Community Affairs (the Department or TDHCA) announces an annual NOFA of approximately \$9,209,884 in Emergency Solutions Grants (ESG) funds for street outreach, emergency shelter, homeless prevention, rapid re-housing, Homeless Management Information System (HMIS), and Administration.
- b) Applicants interested in 2020 ESG funds located within the Continuum of Care (CoC) regions with Local Competitions should not apply to the Department. The Department will not review ESG Applications for activities in CoC regions that have Local Competitions. The CoC regions with Local Competitions are listed in Section 3, Eligible Applicants, of this NOFA.
- c) The Contract Term for funds awarded under this NOFA will be 12 months, and is anticipated to start in the fall of 2020, subject to receipt of adequate funding and any additional terms and conditions from the U.S. Department of Housing and Urban Development (HUD).
- d) Applicants must familiarize themselves with all of the applicable state and federal rules that govern the ESG Program. The availability and use of ESG funds are subject, but not limited to the following:
 - i) State rules under Title 10, Part 1, Chapter 1, Chapter 2 and Chapter 7, Subchapter A; and Subchapter C of the Texas Administrative Code, and for Units of Local Government, the Uniform Grant Management Standards (UGMS) as outlined in Chapter 783 in the Texas Local Government Code (collectively, the ESG State Rules); and

- ii) Federal laws and regulations including the Homeless Emergency Assistance and Rapid Transition to Housing Act (42 U.S.C. §11302 *et. seq.*), as amended; the HUD regulations codified in 24 Code of Federal Regulations (CFR) Part 576; 24 CFR Part 58, for environmental requirements; 2 CFR Part 200 for Uniform Administrative Requirements; 24 CFR §135.38 for Section 3 requirements; and 24 CFR Part 5, Subpart A for fair housing (collectively, the Federal Rules and Regulations).
- e) Updates to the ESG State Rules, anticipated to be adopted on May 21, 2020, will be effective June 12, 2020.
- f) Capitalized terms in this NOFA have the meanings defined herein or as defined in ESG State Rules or the Federal Rules and Regulations.

2) Allocation of Funds.

- a) The initial amount of funds in this NOFA are made available through the Department’s 2020 annual ESG allocation from HUD. The Department, in its sole discretion, may also release under this NOFA unallocated ESG funds from prior years, deobligated funds, voluntarily returned funds, and Program Income, as allowable and available. Some regions will be allocated through the Local Competition, and thus the amounts represented below in those regions would be available only through such Local Competition. The Department, in its sole discretion, also reserves the right to cancel or modify the amount available in this NOFA.
- b) The initial amount made available under this NOFA is subject to an Allocation Formula utilizing the methodology outlined at 10 TAC §7.33 as follows:

CoC Number	CoC Name	Anticipated Allocation Formula Funding
TX500	San Antonio/ Bexar County	\$712,703
TX503	Austin/Travis County	\$579,039
TX600	Dallas City & County/ Irving	\$1,296,412
TX601	Fort Worth/Arlington/ Tarrant County	\$604,750
TX603	El Paso City & County	\$265,058
TX604	Waco/McLennan County	\$143,048
TX607	Texas Balance of State	\$3,643,643
TX611	Amarillo	\$178,947
TX624	Wichita Falls/Wise, Palo Pinto, Wichita, Archer Counties	\$139,755
TX700	City of Houston/Harris County	\$1,457,520
TX701	Bryan/College Station/Brazos Valley	\$189,009
Total:		\$9,209,884

Refer to the ESG Allocation Formula tables located on the Department's website at <https://www.tdhca.state.tx.us/home-division/esgp/applications.htm> for the applicable allocation calculations for each CoC region and for updates prior to submitting an Application.

- c) If the Department adds funds to the NOFA after the start of the Application acceptance period, but before the Application acceptance period closes, the funds will, unless otherwise required by HUD, and except as described in 10 TAC §7.33(a), be distributed statewide in accordance with 10 TAC §7.33(e), and updated on the Department's website.
- d) After the awards are approved under this NOFA, the Board in its sole discretion may amend non-scoring provisions of this NOFA in order to allow a subrecipient to respond to a state or federally declared disaster. The NOFA will remain open for this sole purpose until October 31, 2021.

3) Eligible Applicants.

- a) Eligible Applicants are Units of Local Government as defined by HUD in CPD Notice 17-10 or Private Nonprofit Organizations. Public Housing Authorities and Local Redevelopment Agencies are not federally eligible Applicants.
- b) Per 10 TAC §7.34(c), an Applicant that applies in a Local Competition for ESG funding is not eligible to be awarded funding in the TDHCA funding competition. Applicants in the TX-500 San Antonio/ Bexar County CoC region, and TX-700 City of Houston/Fort Bend, Harris, and Montgomery Counties CoC region are not eligible to apply directly to TDHCA; Applicants in these regions must apply through their ESG Coordinator, for which contact information is listed below:

CoC Region TX-500 San Antonio/ Bexar County
ESG Coordinator: South Alamo Regional Alliance for the Homeless (SARAH)
Website: <https://www.sarahomeless.org/>
Contact Name: Jennifer Serna
Contact Email: jenniferserna@sarahomeless.org
Contact Phone: 210-876-0720

CoC Region TX-700 City of Houston/Fort Bend, Harris, and Montgomery Counties
ESG Coordinator: Coalition for the Homeless of Houston/Harris County
Website: <https://www.homelesshouston.org>
Contact Name: Concetta Scerbo
Contact Email: cscerbo@homelesshouston.org
Contact Phone: 832-930-0984

c) Applicants are required to familiarize themselves with the Department's certification and debarment policies prior to Application submission.

4) Use of funds. The Applicant may not Subgrant funds, but may Subcontract for the provision of services. Such Subcontracts are subject to applicable procurement requirements. The program components below are eligible uses of ESG funds under this NOFA. The Program Participant service components are street outreach, emergency shelter, homelessness prevention, and rapid re-housing.

a) **Street outreach.** The street outreach component includes engagement, case management, emergency health services, emergency mental health services, and transportation. Specific program guidelines can be found at 10 TAC §7.32(f), and 24 CFR §576.101(a).

b) **Emergency shelter.** The emergency shelter component program participant services include case management to coordinate individualized services, child care, education services, employment assistance and job training services, outpatient health services, legal services, life skills, outpatient mental health services, outpatient substance abuse treatment services up to 30 days, excluding inpatient treatment, transportation. Emergency shelter eligible costs also include renovation, rehabilitation, or conversion of buildings to use as emergency shelter, certain costs for operations of emergency shelters, and assistance required under the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970. More specific program guidelines can be found at 10 TAC §7.32(g), and 24 CFR §576.102.

c) **Homelessness prevention.** The homelessness prevention component includes housing relocation and stabilization for financial assistance, housing relocation and stabilization services, and non-duplicative rental assistance provided to persons at-risk of homelessness. More specific program guidelines can be found at 10 TAC §7.32(h), and 24 CFR §576.103.

d) **Rapid re-housing.** The rapid re-housing component includes housing relocation and stabilization for financial assistance, housing relocation and stabilization services, and non-duplicative rental assistance to persons experiencing homelessness. More specific program guidelines can be found at 10 TAC §7.32(h), and 24 CFR §576.104.

e) **HMIS.** The HMIS component includes hardware, software, equipment, office space, utility costs; Salary and staff costs for operation of HMIS, including technical support; HMIS training and overhead costs, including travel to HUD sponsored and approved HMIS training programs and travel costs for staff to conduct intake; HMIS participation fees charged by the HMIS lead agency; HMIS-comparable databases for victim services providers or legal services providers. More specific program guidelines can be found at 10 TAC §7.32(i), and 24 CFR §576.107.

- f) **Administration.** Administration includes general management and oversight of the ESG award, excluding the cost to purchase office space; provision of ESG training and costs to attend HUD-sponsored ESG training; and costs to carry out required environmental reviews. More specific program guidelines can be found at 10 TAC §7.32(j), and 24 CFR §576.108.
- g) Prohibited activities include, but are not limited to, acquisition of real property; new construction; legal services for immigration and citizenship matters, and issues relating to mortgages; inpatient detoxification and other inpatient drug or alcohol treatment; payment of temporary storage fees in arrears; payment or modification of a debt; rehabilitation of structures to the extent that those structures are used for inherently religious activities; mortgage payments, and any activity not specifically performed as allowed under Federal Rules and Regulations and ESG State Rules.

5) Limitation on Funds. Applications for ESG awards must comply with the limitations set forth in 10 TAC §7.36(a)(2) and §7.33(d) as follows:

- a) The maximum amount requested under each ESG Application, including all Program Participant Services, funds for HMIS, and Administrative funds may not exceed the amount of funding available in the CoC region under which the Application is submitted;
- b) The minimum amount requested under each ESG Application, including all Program Participant Services, funds for HMIS, and Administrative funds, must be at least \$50,000, and not more than \$300,000 for all Program Participant services proposed in the Application;
- c) Funds requested for HMIS are limited to 12% of the amount of funds requested for each Program Participant service, for a maximum of \$36,000 per award; and
- d) Funds requested for Administrative activities are limited to three percent of the amount of funds requested for each Program Participant service, for a maximum of \$9,000 per award.

6) Application Review Process.

- a) Each Program Participant service component reflected in an Application will be treated as a separate Application, assigned a separate Application number per service type, and will be scored and ranked separately for each service type selected. Applications may be awarded funds under any or all applied for Program Participant service components.

- b) All materials to submit an Application under this NOFA including program guidelines, and Federal Rules and Regulations, and ESG State Rules, are available on the Department's website at <https://www.tdhca.state.tx.us/home-division/esgp/applications.htm>.
- c) Applications must adhere to the Federal Rules and Regulations, and ESG State Rules in effect at the time of the Application submission. Applications must be on forms provided by the Department, cannot be altered or modified, and must be in final form before submitting them to the Department.
- d) Administrative deficiencies noted during the review of an Application shall be subject to the administrative deficiency process outlined in 10 TAC §7.37.
- e) Applicants will be required to submit a self-score within the Application for each Program Participant service for which funds are requested. In no event will the points awarded to the Applicant exceed the point value of the self-score in any selection criterion.
- f) All Applicants will be subject to a Previous Participation Review by the Department, as outlined in 10 TAC §1.302.
- g) Audit Requirements. All Applicants are subject to the requirements of 10 TAC §1.403, concerning Single Audits.
- h) Pursuant to Tex. Gov't Code §2306.1112 and 10 TAC §1.303, the Executive Award and Review Advisory Committee will make recommendations to the Board regarding funding decisions.

7) Application Submission.

- a) The Application acceptance period starts on June 12, 2020, at 8:00 a.m. Austin local time, and ends on the Application Deadline of **Friday, June 26, 2020, at 5:00 p.m. Austin local time. Applications received after the Application submission deadline will not be considered for an award.** The NOFA will expire the earlier of the date the Department's Governing Board of Directors awards all of the funds under the NOFA, or the deadline described in 24 CFR §576.203(a)(1)--subject to any extensions granted by HUD.
- b) An Applicant must submit a completed Application, required documentation, and associated application materials, as described in this NOFA and as detailed in the 2020 ESG Application Submission Procedures Manual (ASPM). All scanned copies must be scanned in accordance with the guidance provided in the ASPM.
- c) All Application materials including this NOFA, program guidelines, and Federal Rules and Regulations and ESG State Rules are available on the Department's website at

<https://www.tdhca.state.tx.us/home-division/esgp/applications.htm>. Applications will be required to adhere to the threshold requirements in effect at the start of the Application acceptance period. The Application must be on Application forms published online at the above reference site provided by the Department which cannot be altered or modified, and must be in final form before they are submitted to the Department.

- d) This NOFA does not include text of the various applicable regulatory provisions that may be important to the ESG Program. For proper completion of the Application, the Department strongly encourages potential Applicants to review the Federal Rules and Regulations and the ESG State Rules. Please contact the HOME and Homelessness Programs Division for guidance and assistance.

8) Award Selection Process.

- a) Applications submitted directly to the Department for consideration in CoC areas for which there is not an ESG Coordinator will receive points based on experience, program design, budget, previous performance, collaboration, and performance measures as more fully provided for in 10 TAC §7.40. Applications will be scored and ranked for award recommendation in accordance with the provisions of 10 TAC §7.38.
- b) Application review priority will be determined based on Applicant self-score and CoC region funding availability. Applications with the highest self-scores for which total funding requested is less than or equal the amount of funding available within the CoC region under which the Application is submitted will be reviewed as priority Applications.
- c) An Application for which the self-score precludes the likelihood of award will not be reviewed, unless an Application with a higher self-score is determined to be ineligible or incorrectly self-scored. An application log, which includes, at a minimum, the Applicant name, CoC region, self-score of the Application, and the review priority, will be published on the Department's website at <https://www.tdhca.state.tx.us/home-division/esgp/applications.htm>.
- d) The Department may decline to consider any Application if the proposed activities would not, in the Department's sole determination, represent a prudent use of the Department's funds. The Department is not obligated to proceed with any action pertaining to any Applications that are received, and may decide it is in the Department's best interest to refrain from pursuing any selection process or making awards. The Department reserves the right to request clarification on individual elements of any Application.
- e) Funding recommendations of Awards will be presented to the Department's Governing Board of Directors based on eligibility and score, with the Executive Award Review Advisory Council's recommendation. Recommendations are limited by the total amount

of funds available under this NOFA, and the maximum award amount limitations for each component type.

- f) In accordance with Tex. Gov't Code §2306.082 and 10 TAC §1.17, it is the Department's policy to encourage the use of appropriate alternative dispute resolution procedures (ADR) under the Governmental Dispute Resolution Act, Tex. Gov't Code Chapter 2009, to assist in resolving disputes under the Department's jurisdiction.
- g) An Applicant may appeal decisions made by staff in accordance with 10 TAC §1.7.

For questions regarding this NOFA, please contact Naomi Cantu, Coordinator of Homeless Programs and Policy, at 512-475-3975, or esg@tdhca.state.tx.us.

2e

BOARD ACTION REPORT
MULTIFAMILY FINANCE DIVISION
MAY 21, 2020

Report on the 2021 and 2022 QAP Planning Process

When the Board was last updated on the plans for the forthcoming QAPs, TDHCA staff indicated that rather than planning only for the 2021 QAP, issues to be covered for the 2022 QAP would also be addressed. The longer term process was intended to allow staff and stakeholders to more fully develop concepts and provide stability for 2021 Applicants.

On March 13, 2020, Governor Abbott issued a statewide disaster declaration due to the COVID-19 pandemic, authorizing the use of all available resources to cope with the spread of the virus. The nature of this disaster is such that many people and businesses are being impacted, including both those served by Department programs, as well as those who apply for funds from the Department (Applicants or Developers). The QAP Project Plan is being revised in acknowledgement of the many challenges faced by the affordable housing community at this time and to allow all parties to focus on issues related to the pandemic response, not rule development.

In response to meeting challenges and desire to focus on pandemic response, the plan for the 2021 and 2022 QAPs has been modified. Staff will make changes to the 2021 QAP that are primarily limited to correcting errors or clarifying matters that have arisen since publication of the 2020 QAP. A staff draft of the 2021 QAP will be released in summer 2020 and a discussion will then be held on that draft document, prior to presentation of a draft to the Board.

The more robust list of discussion topics originally planned for the 2021 QAP will be shifted for discussion to the 2022 QAP Plan. At the end of 2020, staff will convene a meeting to discuss and potentially narrow those topics if necessary, and better layout the plan for the 2022 QAP.

The revised Plan outlining this in greater detail is attached.



2021 and 2022 Qualified Allocation Plans (QAPs)

Revised Project Plan

May 21, 2020

IMPORTANT DISCLAIMER: THIS PROCESS IS INTENDED TO ENABLE STAKEHOLDERS AND STAFF TO PROPOSE AND DEVELOP IDEAS AND CONCERNS TO BE CONSIDERED IN THE DEVELOPMENT OF THE QAP AND OTHER APPLICABLE RULES FOR 2021 and 2022. THE OFFICIAL PUBLICATION OF A BOARD APPROVED DRAFT FOR PUBLIC COMMENT WILL OCCUR IN ACCORDANCE WITH THE STATUTORILY ESTABLISHED CALENDAR IN FALL 2020 and 2021.

INTRODUCTION TO THE REVISED PLAN

On March 13, 2020, Governor Abbott issued a statewide disaster declaration due to the COVID-19 pandemic, authorizing the use of all available resources to cope with the spread of the virus. The nature of this disaster is such that many people and businesses are being impacted, including both those served by Department programs, as well as those who apply for funds from the Department (Applicants or Developers). The QAP Project Plan is being revised in acknowledgement of the many challenges faced by the affordable housing community at this time, and to allow all parties to focus on issues related to the pandemic response, not rule development.

The roundtables that have been the hallmark of TDHCA's QAP process for the last several years provide an open forum for discussion of the many facets of each QAP measure with multiple stakeholders. Participants have been able to hear varied positions, and come to consensus regarding changes to the QAP for the next year. Unfortunately, those in-person roundtables will not be able to continue for the foreseeable future, and technological solutions don't lend themselves to the larger open-dialogue groups that participate in these conversations.

In response to meeting challenges and desire to focus on pandemic response, the plan for the 2021 and 2022 QAPs has been modified. Because there is little opportunity to fully discuss potential changes, staff will make changes to the 2021 QAP that are primarily limited to correcting errors or clarifying matters that have arisen since publication of the 2020 QAP.

Discussion topics originally planned for the 2021 QAP will be shifted for discussion to the 2022 QAP Plan. At the end of 2020, staff will convene a meeting to discuss and potentially narrow those topics if necessary, and better layout the plan for the 2022 QAP.

INTRODUCTION

The purpose of this project is to solicit and discuss ideas to be considered for inclusion primarily within the 2022 QAP and the Rules. The ultimate deliverables for this project are QAP's and other multifamily rules that clearly articulate TDHCA housing policy as established by the Governing Board through threshold and scoring criteria and also addresses state and federal requirements. TDHCA staff welcomes an open discussion with stakeholders in affordable housing across the state of Texas.

While previous plans for the 2021 and 2022 QAPs had suggested the possibility of a two-year QAP, the limited changes in 2021 in response to the COVID-19 pandemic, will most likely result in changes in 2022 for those issues originally contemplated for both years. Therefore, at this time a two-year QAP is not contemplated for 2021. Due to our biennial legislative calendar, changes to the QAP driven by statute will generally happen in even-numbered years, which could allow for the 2022 QAP to cover a two-year period (2022-2023).

The process for the 2022 QAP will continue to include QAP discussion meetings on the day before Board meetings, outreach efforts so that stakeholders who are not able to attend meetings will have an opportunity for input, and focused meetings with stakeholders that have specific needs and insights. Groups may be convened to address specific topics. Local and regional experts in affordable housing may be requested to present findings at meetings, and staff may conduct and contribute their own research on select issues.

PROJECT GOALS AND PURPOSE

The Multifamily Finance Division (Division) staff will lead the project, including scheduling meetings, accessing necessary resources, facilitating conversations, and compiling results. The Division will provide periodic reports to the Board, so they have regular progress updates and have an opportunity for input throughout the process. Staff from other TDHCA divisions may be asked to participate as needed.

Stakeholders, including the development community, advocates for various interest groups served by affordable housing, residents of TDHCA properties, and various subject matter experts will be invited to participate in meetings, surveys, or other forms of public comment and discussion so that a clear assessment of varying needs and priorities may be compiled. That assessment, along with applicable statutory and regulatory requirements, will be used to draft amendments and changes to develop the proposed 2022 QAP. For the 2021 QAP, a meeting will be held through a webinar platform after release of the staff draft, and staff will solicit feedback through other avenues. These possible media outlets include online polls, website forums, and digital focus groups.

It is anticipated that a staff draft of the 2021 QAP will be available by the end of June, 2020. It is anticipated that the staff draft of the 2022 QAP will be available in late summer 2021, incorporating changes discussed over the two years previous and any changes required by statute. Specific sections of the QAP may be drafted and made available for informal comment throughout the process, in order to provide for the most effective possible feedback on those items.

PROJECT SCOPE

The scope of the project will include the planning and development of specific topics to be considered for amendment in the 2022 QAP and Rules, and potentially later editions. This is an ever-evolving process and there may be items that will be continued into subsequent years. Other parts of the Rules may be included in the project as needed.

The project will, in certain matters, rely heavily on data gathered from external sources. Sources may include (but will not be limited to) Census and American Community Survey data, reputable research centers, and best practices from other organizations or states. Internal data may include TDHCA's Compliance Monitoring and Tracking System (CMTS), data from cost certifications compiled by the Asset Management Division, and data gathered from previous application rounds. To the greatest extent possible, data applied to the QAP will come from readily-accessible nonpartisan public sources or aggregators of those sources.

Based on previous conversations, staff's research, and policy directions from the Governing Board, staff proposes the following topics as the initial points of departure as the Division and stakeholders begin composing the 2022 QAP and Rules:

2021 QAP topics

1. Texas Education Agency School Ratings a. Alternative mitigation efforts for neighborhood risk factor regarding public schools
2. Definition of Supportive Housing
3. Administrative Items / Adding or revising definitions, as necessary
4. Corrections and Clarifications
5. Responding to any changes in federal law, regulation, or guidance , if necessary

2022 QAP topics

1. Sponsor Characteristics
 - Qualified Nonprofit Organization definition
 - a. Historically Underutilized Businesses
 - b. Service Providers
2. Proximity to Job Areas
 - a. Proximity to Jobs and Proximity to Urban Core
3. Cost Containment
 - a. Credits per unit
 - b. Cost per square foot
 - c. Voluntary eligible basis
 - d. New construction/reconstruction/rehabilitation
 - e. Impact of basic boost
4. Preservation
 - a. Extended Affordability
 - b. Opportunity Index & Concerted Revitalization Plan
 - c. Right of First Refusal
 - d. Undesirable Site Features and Neighborhood Risk Factors
5. Energy Efficiency and Sustainable Development
 - a. Threshold and Scoring measures
 - b. Geographic Impact
6. Readiness to Proceed

COMMUNICATIONS PLAN

Information regarding the ongoing work of the Project Plan will be provided in the most transparent manner possible. During the 2021 QAP Planning Process, all information discussion and distribution will be done digitally and remotely.

Communication Type	Description	Format	Participants/Distribution	Deliverable
Status Report to Governing Board	Report on Project progress	In Board Materials	TDHCA staff and Board	Board report or Action Request as needed
Website	Posting of Meetings and Materials	Website	Multifamily Finance	Resource for Project participants
Online Forum	Method for gathering stakeholder input	Website	All	Input regarding specific topics to be integrated into rulemaking process
Online Polls	Method for gathering stakeholder input	Website	All	Input regarding specific topics to be integrated into rulemaking process
Webinar	On-line meeting to discuss the 2021 Staff Draft of the QAP.	Web-based	All	Input on the 2021 Staff Draft of the QAP.

While informal communication is a part of every project and is necessary for successful project completion, any issues, concerns, or updates that arise from informal discussion between TDHCA staff and stakeholders will be communicated to the larger group so that the appropriate action may be taken.

5b

BOARD ACTION REQUEST
BOND FINANCE DIVISION
MAY 21, 2020

Presentation, discussion, and possible action regarding the Issuance of Multifamily Green Tax-Exempt Bonds (Green M-TEBS – 333 Holly) Resolution No. 20-020 and a Determination Notice of Housing Tax Credits

RECOMMENDED ACTION

WHEREAS, the Board adopted an inducement resolution for 333 Holly at the Board meeting of October 10, 2019;

WHEREAS, a 4% Housing Tax Credit application for 333 Holly, sponsored by Rainbow - Holly, LLC, which includes Rainbow Housing Texas, Inc. as sole member of the general partner was submitted to the Department on April 10, 2020;

WHEREAS, a Certification of Reservation (Reservation) was issued in the amount of \$36,800,000 on May 7, 2020, with a bond delivery deadline of November 3, 2020;

WHEREAS, the Executive Award Review Advisory Committee (EARAC) considered and approved the program and underwriting aspects of the application;

WHEREAS, in accordance with 10 TAC §1.301(d)(1), the compliance history is designated as a Category 3 and is on this Board agenda for consideration by the Board under Item 4;

WHEREAS, only if the compliance history is approved by the Board may the Board take action under this agenda item relating to the issuance of Multifamily Green Tax-Exempt Bonds and the issuance of a Determination Notice, based on the facts and circumstances unique to this transaction and discussed herein that necessitate consideration on the same agenda as a recommendation of denial from compliance;

WHEREAS, Board approval of the compliance history despite the Category 3 designation would prompt the Board to impose conditions on the applicant of this award should they so choose; and

NOW, therefore, it is hereby

RESOLVED, that the issuance of Multifamily Green Tax-Exempt Bonds (Green M-TEBS – 333 Holly) in an amount not to exceed \$38,600,000, Resolution No. 20-020 is hereby approved in the form presented to this meeting;

FURTHER RESOLVED, the issuance of a Determination Notice of \$2,484,301 in 4% Housing Tax Credits for 333 Holly, subject to underwriting conditions that may be applicable as found in the Real Estate Analysis report posted to the Department's website, is hereby approved in the form presented to this meeting;

FURTHER RESOLVED, any conditions imposed by the Board relating to the compliance history of the applicant are hereby a condition of the award; and

FURTHER RESOLVED, that if approved, staff is authorized, empowered, and directed, for and on behalf of the Department to execute such documents, instruments and writings and perform such acts and deeds as may be necessary to effectuate the foregoing.

BACKGROUND

General Information: The Bonds will be issued in accordance with Tex. Gov't Code §2306.353 *et seq.*, which authorizes the Department to issue revenue bonds for its public purposes, as defined therein. Tex. Gov't Code §2306.472 provides that the Department's revenue bonds are solely obligations of the Department, and do not create an obligation, debt or liability of the State of Texas or a pledge or loan of faith, credit or taxing power of the State of Texas.

Development Information: 333 Holly is located at 333 Holly Court in The Woodlands, Montgomery County, and proposes the acquisition and rehabilitation of 332 units that will continue to serve the general population. The property was built in two phases; Phase 1 of the project was built in 1982 (Buildings 1-11) and Phase 2 was built in 1984 (Buildings 12-24). The Reservation from the Bond Review Board was issued under the Priority 3 designation, which does not have a prescribed restriction on the percentage of Area Median Family Income (AMFI) that must be served. This application proposes to implement the Income Averaging set-aside where 86 of the units will be rent and income restricted at 40% of AMFI, 53 of the units will be rent and income restricted at 50% of AMFI, 98 units will be rent and income restricted at 60% of AMFI, and 95 of the units will be rent and income restricted at 80% of AMFI. There is an existing Section 8 HAP contract covering 139 of the units that is expected to continue. Rehabilitation costs (includes building costs and site work) are approximately \$47k per unit.

This application was originally submitted in December 2019, with Private Activity Bonds proposed to be issued through Montgomery County Housing Finance Corporation (HFC). The organizational structure associated with that application involved Texas Housing Foundation (THF) as the sole member of the general partner. In April 2020, the applicant moved the transaction to TDHCA as the issuer, which resulted in some changes to the full application that had already undergone a program review by staff. One change was to the organizational structure, which replaced THF with Rainbow Housing Texas, Inc (Rainbow) as the sole member of the general partner. For efficiency and in line with common practice with respect to these types of changes, submission of a new application was not required; rather, the applicant was instructed to submit revised application exhibits affected by the change to allow an additional review of these items to be performed by staff and inserted into the application.

Once the previous participation review was completed and it was determined that there was an event of foreclosure associated with Rainbow, staff realized that the *Development Owner Certification, Acknowledgement and Consent* form in the application failed to disclose such event pursuant to §11.202(1)(M) which states, in part, that “*an Applicant may be considered ineligible if...the Applicant, Developer, or Guarantor...*”

(M) Fails to disclose, in the Application, any Principal or any entity or Person in the Development ownership structure who was or is involved as a Principal in any other affordable housing transaction, that has terminated voluntarily or involuntarily within the past 10 years, or plans to or is negotiating to terminate, their relationship with any other affordable housing development. The disclosure must identify the person or persons and development involved, the identity of each other development, and contact information for the other Principals of each such development, a narrative description of the facts and circumstances of the termination or proposed termination, and any appropriate supporting documents. An Application may be referred to the Board for a determination of a person’s fitness to be involved as a Principal with respect to an Application, which may include a staff recommendation...”

Based on Board action under Item 4 on today’s agenda approving the compliance history of this application, staff believes the aforementioned failure to disclose has been addressed and no additional action by the Board or applicant under §11.202 is required under the current agenda item.

Organizational Structure and Previous Participation: The Borrower is 333 Holly Preservation, LP and includes the entities and principals as illustrated in Exhibit A. The applicant’s portfolio is considered a Category 3 and if this item is being considered, then the previous participation was deemed acceptable by the Board under agenda Item 4 on today’s agenda. Any conditions imposed by the Board as a result of their approval of the compliance history will be factored into this award.

Staff notes that applications for which there is a Category 3 designation under the previous participation rules are decided from an eligibility standpoint on the Board agenda, followed by a decision on the award on a subsequent Board agenda, assuming the compliance history was approved. The 333 Holly transaction warrants consideration on the same agenda as the compliance eligibility (only to the extent the compliance history is approved) based on circumstances unique to the transaction.

333 Holly was originally placed under contract in July 2019. The Board adopted an inducement resolution in October 2019. Concurrent with the Board’s inducement, the applicant tracked the development through Montgomery County HFC with the goal of obtaining a bond reservation sooner, as well as track the various local approvals necessary for the application. Despite being in-line for a bond reservation with Montgomery County HFC last fall, there was no volume cap left in 2019 to secure a reservation. A reservation was obtained at the start of the 2020 program year in January, and the full HTC application was submitted and reviewed by staff shortly thereafter. As the application was in underwriting the applicant made the decision to switch issuers to TDHCA. With limited volume cap remaining in its set-aside, staff started conversations with the Attorney General’s office to transfer the volume cap associated with 333 Holly from Montgomery County HFC to TDHCA; however, in the midst

of COVID-19, those conversations did not result in any determination as to what local approvals would be required.

The applicant revised the financing structure to accommodate the limited volume cap the Department had, as well as modify the organizational structure to include a different non-profit entity for purposes of seeking a 50% property tax exemption (in lieu of the 100% exemption the prior nonprofit general partner could provide). The Department expeditiously processed these changes, held a TEFRA hearing and worked with bond counsel and the working group to get substantially final bond documents before the Board today, something that was accomplished in only two weeks' time – demonstrating the commitment by the financing partners to this transaction and their desire to close.

Given that the Department is the issuer, the transaction will require Bond Review Board approval, which lengthens the timeline by which to close, something that is not required for local issuer transactions. Moreover, while the purchase contract provides for an extension, it is only if the delay is attributable to the renewal and transfer of the existing HAP contract by HUD. The seller is under no obligation to extend the closing date if the delay is attributable to TDHCA. To delay consideration of the award until the June Board meeting would impact the closing timeline that could unduly jeopardize the transaction, based not only on the aforementioned factors, but based on market conditions and potential disruptions in response to COVID-19, and the desire of all financing participants to close the transaction as quickly as possible.

Tax Equity and Fiscal Responsibility Act (TEFRA) Public Hearing/Public Comment: In light of COVID-19 and the inability for an in-person TEFRA hearing to be held, staff proceeded (under guidance from Bracewell, bond counsel to the Department), to conduct a telephonic hearing for the proposed development which was held on April 30, 2020. Given that it was via telephone and would ordinarily be difficult to discern exactly how many individuals participated in the hearing, there is an option on the call line to obtain a participant count. For this hearing there were only two attendees, which represented staff conducting the hearing. A copy of the hearing transcript is included herein. The Department has received no letters of support or opposition for this development. Staff notes that the IRS subsequently published guidance that conducting a TEFRA via telephone is acceptable in light of COVID-19.

Summary of Financial Structure

This transaction utilizes a Fannie Mae Multifamily Pass-Through Mortgage-Backed Security (MBS). The mortgage loan will be originated by the Department to the Borrower on the closing date and funded with bond proceeds. Simultaneously with the closing, the loan will be assigned to the Fannie Mae lender (Wells Fargo Multifamily Capital) and the funds used by the lender by which to acquire the loan will be deposited into the collateral account to secure the bonds. The project will be 100% cash collateralized at all times, which offers protection for the bondholders. Approximately 10-15 days from the closing date Wells Fargo Multifamily Capital will assign the loan to Fannie Mae and in exchange, Fannie will deliver the MBS to the trustee. The trustee will use the funds (loan proceeds from Wells

Fargo) in the collateral account to purchase the MBS which will be used to secure the bonds from that point forward. Payments on the bonds will be guaranteed by Fannie Mae.

Under the proposed structure, the Department will issue tax-exempt fixed rate bonds in an amount not to exceed \$38,600,000 that will be initially placed with Wells Fargo Multifamily Capital. The bonds will have an interest rate that mirrors the pass-through rate on the MBS, currently estimated to be 2.50%, which does not include servicing (0.420%) or guarantee fees (0.780%). The all-in rate will be 3.70%. The loan will have a term of 17 years and a 35-year amortization. The bonds will have a maximum maturity date of June 1, 2040, but are expected to reach maturity on July 1, 2037.

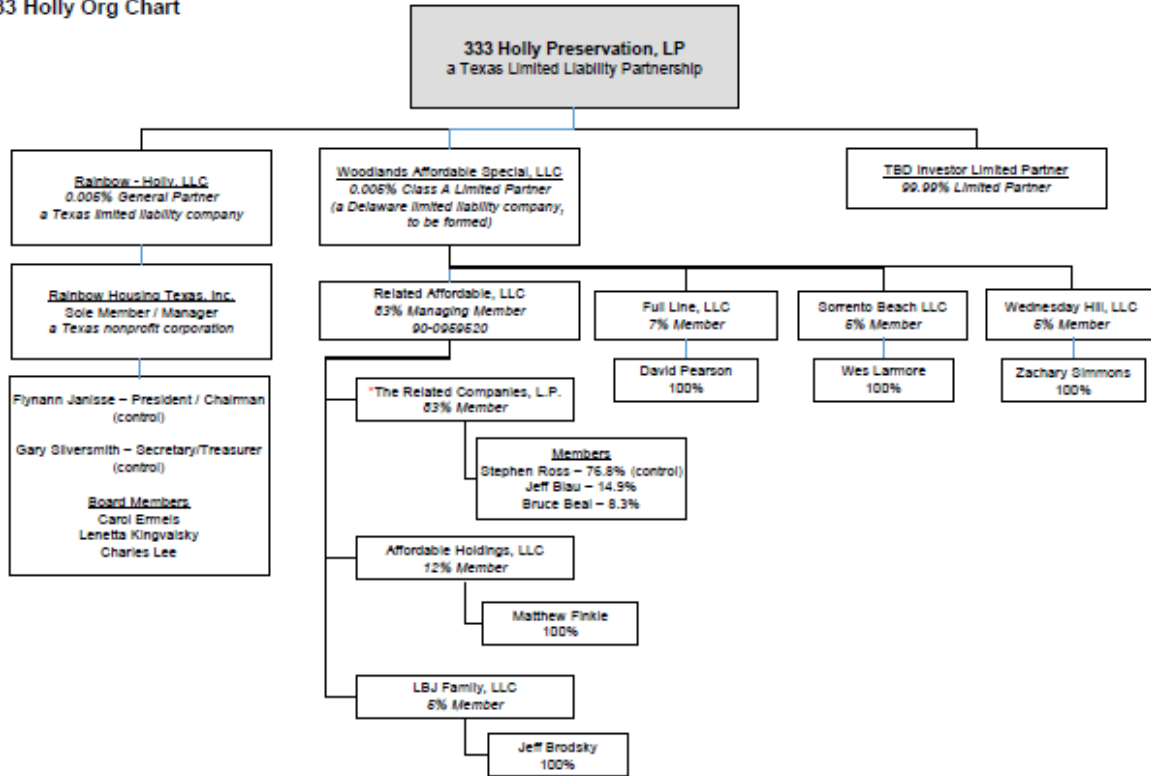
In addition to the \$36,800,000 in tax-exempt proceeds, the transaction also involves \$8,200,000 in taxable, conventional debt. Although the transaction was originally contemplated to have all project costs funded with tax-exempt bonds, limitations on available volume cap required use of taxable conventional debt. The tax-exempt bonds being issued are sufficient to meet the 50% test related to bond proceeds that are required to finance at least 50% of the development's aggregate basis in order to qualify for the 4% HTC.

Additionally, unique to this transaction is that it is utilizing a product from Fannie under their Green Building Program. The name of the issuance reflects that they are Multifamily Green Tax-Exempt Bonds. Fannie Mae offers incentives (preferential pricing and a free energy and water audit paid by Fannie) for owners who commit to property improvements that are projected to reduce the property's annual energy and/or water consumption by at least 30%. As a result of these features it will disclose the Green Loan as a Green MBS and will presumably be able to access a broader MBS investor market.

A copy of the Exhibits recommended to be approved by the Board as referenced in Resolution No. 20-020 can be found online at TDHCA's Board Meeting Information Center website at <http://www.tdhca.state.tx.us/board/meetings.htm>.

Exhibit A

333 Holly Org Chart



*The Related Companies, L.P. is the Guarantor.

RESOLUTION NO. 20-020

RESOLUTION AUTHORIZING AND APPROVING THE ISSUANCE, SALE AND DELIVERY OF TEXAS DEPARTMENT OF HOUSING AND COMMUNITY AFFAIRS MULTIFAMILY GREEN TAX-EXEMPT BONDS (GREEN M-TEBS – 333 HOLLY) SERIES 2020; APPROVING THE FORM AND SUBSTANCE AND AUTHORIZING THE EXECUTION AND DELIVERY OF DOCUMENTS AND INSTRUMENTS PERTAINING THERETO; AUTHORIZING AND RATIFYING OTHER ACTIONS AND DOCUMENTS; AND CONTAINING OTHER PROVISIONS RELATING TO THE SUBJECT

WHEREAS, the Texas Department of Housing and Community Affairs (the “Department”) has been duly created and organized pursuant to and in accordance with the provisions of Chapter 2306, Texas Government Code, as amended (the “Act”), for the purpose, among others, of providing a means of financing the costs of residential ownership, development, construction and rehabilitation that will provide decent, safe, and affordable living environments for individuals and families of low, very low and extremely low income (as defined in the Act) and families of moderate income (as described in the Act and determined by the Governing Board of the Department (the “Board”) from time to time); and

WHEREAS, the Act authorizes the Department: (a) to make mortgage loans to housing sponsors to provide financing for multifamily residential rental housing in the State of Texas (the “State”) intended to be occupied by individuals and families of low, very low and extremely low income and families of moderate income, as determined by the Department; (b) to issue its revenue bonds, for the purpose, among others, of obtaining funds to make such loans and provide financing, to establish necessary reserve funds and to pay administrative and other costs incurred in connection with the issuance of such bonds; and (c) to pledge all or any part of the revenues, receipts or resources of the Department, including the revenues and receipts to be received by the Department from such multifamily residential rental development loans, and to mortgage, pledge or grant security interests in such loans or other property of the Department in order to secure the payment of the principal or redemption price of and interest on such bonds; and

WHEREAS, the Board has determined to authorize the issuance of its Texas Department of Housing and Community Affairs Multifamily Green Tax-Exempt Bonds (GREEN M-TEBS – 333 HOLLY) Series 2020 (the “Bonds”) pursuant to and in accordance with the terms of an Indenture of Trust (the “Indenture”) between the Department and BOKF, NA, as trustee (the “Trustee”), for the purpose of obtaining funds to finance the Development (defined below), all under and in accordance with the Constitution and laws of the State; and

WHEREAS, the Department desires to use the proceeds of the Bonds to fund a mortgage loan to 333 Holly Preservation, LP, a Texas limited partnership (the “Borrower”) in order to finance the cost of acquisition, equipping and rehabilitation of a qualified residential rental development described in Exhibit A attached hereto (the “Development”) located within the

State and required by the Act to be occupied by individuals and families of low and very low income and families of moderate income, as determined by the Department; and

WHEREAS, the Board, by a resolution adopted on October 10, 2019, declared its intent to issue its revenue bonds to provide financing for the Development; and

WHEREAS, the Borrower has requested and received a reservation of private activity bond allocation from the State of Texas; and

WHEREAS, it is anticipated that the Department, the Trustee, the Lender (defined below) and the Borrower will execute and deliver a Financing Agreement (the "Financing Agreement") pursuant to which (i) the Department will agree to make a mortgage loan (the "Loan") to the Borrower to enable the Borrower to finance the cost of acquisition, equipping and rehabilitation of the Development and related costs, and (ii) the Borrower will execute and deliver to the Department a promissory note (the "Note") in an original principal amount equal to the original aggregate principal amount of the Bonds, and providing for payment of interest on such principal amount sufficient to pay the interest on the Bonds in accordance with the terms of a Multifamily Loan and Security Agreement (Non-Recourse) (the "Loan Agreement") by and between the Borrower and the Department and to pay other costs described in the Financing Agreement; and

WHEREAS, it is anticipated that the Note will be secured by a Multifamily Deed of Trust, Assignment of Leases and Rents, Security Agreement and Fixture Filing (the "Mortgage") from the Borrower for the benefit of the Department; and

WHEREAS, it is anticipated that the obligations of the Borrower under the Financing Agreement (other than for the repayment of principal and interest) will be secured by a Subordinate Multifamily Deed of Trust, Security Agreement and Fixture Filing (the "Subordinate Mortgage") from the Borrower for the benefit of the Department and the Trustee; and

WHEREAS, the Borrower will obtain a loan from, Wells Fargo Bank, National Association, as lender (the "Lender"), and the Lender will deposit the proceeds of such loan with the Trustee, to be held by the Trustee as security for the Bonds in accordance with the Indenture; and

WHEREAS, in connection with the financing of the Development, the Borrower will also obtain a taxable mortgage loan (the "Taxable Mortgage Loan") from the Lender; and

WHEREAS, the Board has determined that the Department, the Trustee, and the Borrower will execute a Tax Exemption Certificate and Agreement (the "Tax Exemption Agreement") to set forth various facts, certifications, covenants, representations, and warranties regarding the Bonds and the Development and to establish the expectations of the Department, the Trustee, and the Borrower as to future events regarding the Bonds, the Development, and the use and investment of proceeds of the Bonds; and

WHEREAS, the Board has determined that the Department, the Trustee and the Borrower will execute a Regulatory and Land Use Restriction Agreement (the "Regulatory Agreement") with respect to the Development, which will be filed of record in the real property records of Montgomery County, Texas; and

WHEREAS, the Lender has agreed to permit the Loan and the Taxable Mortgage Loan, and to allow the lien of the Subordinate Mortgage in accordance with the terms of a Subordination Agreement (Affordable) (the "Subordination Agreement") among the Lender, the Department and the Borrower; and

WHEREAS, the Board has been presented with a draft of, has considered and desires to ratify, approve, confirm and authorize the use and distribution in the public offering of the Bonds of an Official Statement (the "Official Statement") and to authorize the Authorized Representatives (as defined herein) of the Department to deem the Official Statement "final" for purposes of Rule 15c2-12 of the Securities and Exchange Commission and to approve the making of such changes in the Official Statement as may be required to provide a final Official Statement for use in the public offering and sale of the Bonds; and

WHEREAS, the Board has further determined that the Department will enter into a Purchase Contract (the "Bond Purchase Agreement") with Jefferies LLC (the "Underwriter"), and the Borrower, setting forth certain terms and conditions upon which the Underwriter will purchase all of the Bonds from the Department and the Department will sell the Bonds to the Underwriter; and

WHEREAS, the Board has examined proposed forms of (a) the Indenture, the Financing Agreement, the Tax Exemption Agreement, the Regulatory Agreement, the Loan Agreement, the Subordination Agreement, the Official Statement and the Bond Purchase Agreement (collectively, the "Issuer Documents"), all of which are attached to and comprise a part of this Resolution and (b) the Mortgage, the Subordinate Mortgage and the Note; has found the form and substance of such documents to be satisfactory and proper and the recitals contained therein to be true, correct and complete; and has determined, subject to the conditions set forth in Article 1, to authorize the issuance of the Bonds, the execution and delivery of the Issuer Documents, the acceptance of the Mortgage, the Subordinate Mortgage and the Note and the taking of such other actions as may be necessary or convenient in connection therewith;

NOW, THEREFORE, BE IT RESOLVED BY THE GOVERNING BOARD OF THE TEXAS DEPARTMENT OF HOUSING AND COMMUNITY AFFAIRS:

ARTICLE 1

ISSUANCE OF BONDS; APPROVAL OF DOCUMENTS

Section 1.1 Issuance, Execution and Delivery of the Bonds. That the issuance of the Bonds is hereby authorized pursuant to the Act, including particularly Section 2306.353 thereof,

and Chapter 1371, Texas Government Code, all under and in accordance with the conditions set forth herein and in the Indenture, and that, upon execution and delivery of the Indenture, the Authorized Representatives of the Department named in this Resolution are each hereby authorized to execute, attest and affix the Department's seal to the Bonds and to deliver the Bonds to the Attorney General of the State (the "Attorney General") for approval, the Comptroller of Public Accounts of the State for registration and the Trustee for authentication (to the extent required in the Indenture), and thereafter to deliver the Bonds to or upon the order of the initial purchaser thereof pursuant to the Bond Purchase Agreement.

Section 1.2 Interest Rate, Principal Amount, Maturity and Price. That the Chair or Vice Chair of the Board or the Executive Director of the Department are hereby authorized and empowered, in accordance with Chapter 1371, Texas Government Code, to fix and determine the interest rate, principal amount and maturity of, the redemption and tender provisions related to, and the price at which the Department will sell to the Underwriter or another party to the Bond Purchase Agreement, the Bonds, all of which determinations shall be conclusively evidenced by the execution and delivery by an Authorized Representative (as defined below) of the Department of the Indenture and the Bond Purchase Agreement; provided, however, that (i) the Bonds shall bear interest at the interest rate set forth in the Bond Purchase Agreement in accordance with the provisions of the Indenture; provided that in no event shall the interest rate on the Bonds (including any default interest rate) exceed the maximum interest rate permitted by applicable law; and provided further that the initial interest rate on the Bonds shall not exceed 6.00% (ii) the aggregate principal amount of the Bonds shall not exceed \$36,800,000; (iii) the final maturity of the Bonds shall occur not later than June 1, 2040; and (iv) the price at which the Bonds are sold to the initial purchaser thereof under the Bond Purchase Agreement shall not exceed 100% of the principal amount thereof.

Section 1.3 Approval, Execution and Delivery of the Indenture. That the form and substance of the Indenture are hereby approved, and that the Authorized Representatives (as defined below) are each hereby authorized to execute the Indenture, and to deliver the Indenture to the Trustee.

Section 1.4 Approval, Execution and Delivery of the Financing Agreement and the Loan Agreement. That the form and substance of the Financing Agreement and the Loan Agreement are hereby approved, and that the Authorized Representatives are each hereby authorized to execute the Financing Agreement and the Loan Agreement, and to deliver the Financing Agreement and the Loan Agreement to the Borrower.

Section 1.5 Approval, Execution and Delivery of the Tax Exemption Agreement. That the form and substance of the Tax Exemption Agreement relating to the Bonds are hereby approved and the Authorized Representatives are each hereby authorized to execute the Tax Exemption Agreement and to deliver the Tax Exemption Agreement to the Borrower and the Trustee.

Section 1.6 Approval, Execution and Delivery of the Regulatory Agreement. That the form and substance of the Regulatory Agreement are hereby approved, and that the

Authorized Representatives are each hereby authorized to execute, attest and affix the Department's seal to the Regulatory Agreement, and to deliver the Regulatory Agreement to the Borrower and the Trustee and to cause the Regulatory Agreement to be filed of record in the real property records of Montgomery County, Texas.

Section 1.7 Approval, Execution and Delivery of the Bond Purchase Agreement. That the sale of the Bonds to the Underwriter and/or any other parties pursuant to the Bond Purchase Agreement is hereby approved, that the form and substance of the Bond Purchase Agreement are hereby approved, and that the Authorized Representatives are each hereby authorized to execute the Bond Purchase Agreement and to deliver the Bond Purchase Agreement to the Borrower, the Underwriter, and/or any other parties to the Bond Purchase Agreement, as appropriate.

Section 1.8 Acceptance of the Note, the Mortgage and the Subordinate Mortgage. That the form and substance of the Note, the Mortgage and the Subordinate Mortgage are hereby accepted by the Department and that the Authorized Representatives are each hereby authorized to endorse and deliver the Note without recourse.

Section 1.9 Approval, Execution and Delivery of the Subordination Agreement. That the form and substance of the Subordination Agreement are hereby approved, and that the Authorized Representatives are each hereby authorized to execute the Subordination Agreement, and to deliver the Subordination Agreement to the Lender and the Borrower and to cause the Subordination Agreement to be filed of record in the real property records of Montgomery County, Texas.

Section 1.10 Approval, Execution, Use and Distribution of the Official Statement. That the form and substance of the Official Statement and its use and distribution by the Underwriter in accordance with the terms, conditions and limitations contained therein are hereby approved, ratified, confirmed and authorized; that the Chair and Vice Chair of the Board and the Executive Director of the Department are hereby severally authorized to deem the Official Statement "final" for purposes of Rule 15c2-12 under the Securities and Exchange Act of 1934; that the Authorized Representatives named in this Resolution are each authorized hereby to make or approve such changes in the Official Statement as may be required to provide a final Official Statement for the Bonds; that the Authorized Representatives named in this Resolution are each authorized hereby to accept the Official Statement, as required; and that the use and distribution of the Official Statement by the Underwriter hereby is authorized and approved, subject to the terms, conditions and limitations contained therein, and further subject to such amendments or additions thereto as may be required by the Bond Purchase Agreement and as may be approved by the Executive Director of the Department and the Department's counsel.

Section 1.11 Taking of Any Action; Execution and Delivery of Other Documents. That the Authorized Representatives are each hereby authorized to take any actions and to execute, attest and affix the Department's seal to, and to deliver to the appropriate parties, all such other agreements, commitments, assignments, bonds, certificates, contracts, documents, instruments, releases, financing statements, letters of instruction, notices of acceptance,

written requests and other papers, whether or not mentioned herein, as they or any of them consider to be necessary or convenient to carry out or assist in carrying out the purposes of this Resolution.

Section 1.12 Power to Revise Form of Documents. That, notwithstanding any other provision of this Resolution, the Authorized Representatives are each hereby authorized to make or approve such revisions in the form of the documents attached hereto as exhibits as, in the judgment of such Authorized Representative, and in the opinion of Bracewell LLP, Bond Counsel to the Department (“Bond Counsel”), may be necessary or convenient to carry out or assist in carrying out the purposes of this Resolution, such approval to be evidenced by the execution of such documents by the Authorized Representatives.

Section 1.13 Exhibits Incorporated Herein. That all of the terms and provisions of each of the documents listed below as an exhibit shall be and are hereby incorporated into and made a part of this Resolution for all purposes:

- Exhibit B - Indenture
- Exhibit C - Financing Agreement
- Exhibit D - Loan Agreement
- Exhibit E - Tax Exemption Agreement
- Exhibit F - Regulatory Agreement
- Exhibit G - Bond Purchase Agreement
- Exhibit H - Note
- Exhibit I - Mortgage
- Exhibit J - Subordinate Mortgage
- Exhibit K - Subordination Agreement
- Exhibit L - Official Statement

Section 1.14 Authorized Representatives. That the following persons are each hereby named as authorized representatives of the Department for purposes of executing, attesting, affixing the Department’s seal to, and delivering the documents and instruments and taking the other actions referred to in this Article 1: the Chair or Vice Chair of the Board, the Executive Director of the Department, the Director of Administration of the Department, the Director of Financial Administration of the Department, the Director of Bond Finance and Chief Investment Officer of the Department, the Director of Multifamily Bonds of the Department, the Director of Texas Homeownership of the Department and the Secretary or any Assistant Secretary to the Board. Such persons are referred to herein collectively as the “Authorized Representatives.” Any one of the Authorized Representatives is authorized to act individually as set forth in this Resolution.

ARTICLE 2

APPROVAL AND RATIFICATION OF CERTAIN ACTIONS

Section 2.1 Approval and Ratification of Application to Texas Bond Review Board. That the Board hereby ratifies and approves the submission of the application for approval of state bonds to the Texas Bond Review Board on behalf of the Department in connection with the issuance of the Bonds in accordance with Chapter 1231, Texas Government Code.

Section 2.2 Approval of Submission to the Attorney General. That the Board hereby authorizes, and approves the submission by Bond Counsel to the Attorney General, for his approval, of a transcript of legal proceedings relating to the issuance, sale and delivery of the Bonds.

Section 2.3 Certification of the Minutes and Records. That the Secretary or Assistant Secretary to the Board hereby is authorized to certify and authenticate minutes and other records on behalf of the Department for the Bonds and all other Department activities.

Section 2.4 Approval of Requests for Rating from Rating Agency. That the action of the Executive Director of the Department or any successor and the Department's consultants in seeking a rating from Moody's Investors Services, Inc., and its successors and assigns, is approved, ratified and confirmed hereby.

Section 2.5 Authority to Invest Proceeds. That the Department is authorized to invest and reinvest the proceeds of the Bonds and the fees and revenues to be received in connection with the financing of the Development in accordance with the Indenture and the Tax Exemption Agreement and to enter into any agreements relating thereto only to the extent permitted by the Indenture and the Tax Exemption Agreement.

Section 2.6 Underwriter. That the underwriter with respect to the issuance of the Bonds will be Jefferies LLC, or any other party identified in the Bond Purchase Agreement.

Section 2.7 Engagement of Other Professionals. That the Executive Director of the Department or any successor is authorized to engage auditors to perform such functions, audits, yield calculations and subsequent investigations as necessary or appropriate to comply with the Bond Purchase Agreement and the requirements of Bond Counsel, provided such engagement is done in accordance with applicable law of the State.

Section 2.8 Ratifying Other Actions. That all other actions taken by the Executive Director of the Department and the Department staff in connection with the issuance of the Bonds and the financing of the Development are hereby ratified and confirmed.

ARTICLE 3

CERTAIN FINDINGS AND DETERMINATIONS

Section 3.1 Findings of the Board. That in accordance with Section 2306.223 of the Act and after the Department's consideration of the information with respect to the Development and the information with respect to the proposed financing of the Development by the Department, including but not limited to the information submitted by the Borrower, independent studies commissioned by the Department, recommendations of the Department staff and such other information as it deems relevant, the Board hereby finds:

(a) Need for Housing Development.

(i) that the Development is necessary to provide needed decent, safe, and sanitary housing at rentals or prices that individuals or families of low and very low income or families of moderate income can afford,

(ii) that the financing of the Development is a public purpose and will provide a public benefit, and

(iii) that the Development will be undertaken within the authority granted by the Act to the housing finance division and the Borrower.

(b) Findings with Respect to the Borrower.

(i) that the Borrower, by operating the Development in accordance with the requirements of the Financing Agreement, the Tax Exemption Agreement and the Regulatory Agreement, will supply well-planned and well-designed housing for individuals or families of low and very low income or families of moderate income,

(ii) that the Borrower is financially responsible, and

(iii) that the Borrower is not, and will not enter into a contract for the Development with, a housing developer that (A) is on the Department's debarred list, including any parts of that list that are derived from the debarred list of the United States Department of Housing and Urban Development; (B) breached a contract with a public agency; or (C) misrepresented to a subcontractor the extent to which the developer has benefited from contracts or financial assistance that has been awarded by a public agency, including the scope of the developer's participation in contracts with the agency and the amount of financial assistance awarded to the developer by the Department.

(c) Public Purpose and Benefits.

(i) that the Borrower has agreed to operate the Development in accordance with the Financing Agreement, the Tax Exemption Agreement and the Regulatory

Agreement, which require, among other things, that the Development be occupied by individuals and families of low, very low and extremely low income and families of moderate income, and

(ii) that the issuance of the Bonds to finance the Development is undertaken within the authority conferred by the Act and will accomplish a valid public purpose and will provide a public benefit by assisting individuals and families of low, very low and extremely low income and families of moderate income in the State to obtain decent, safe, and sanitary housing by financing the costs of the Development, thereby helping to maintain a fully adequate supply of sanitary and safe dwelling accommodations at rents that such individuals and families can afford.

Section 3.2 Determination of Eligible Tenants. That the Board has determined, to the extent permitted by law and after consideration of such evidence and factors as it deems relevant, the findings of the staff of the Department, the laws applicable to the Department and the provisions of the Act, that eligible tenants for the Development shall be (1) individuals and families of low, very low and extremely low income, (2) persons with special needs, and (3) families of moderate income, with the income limits as set forth in the Tax Exemption Agreement and the Regulatory Agreement.

Section 3.3 Sufficiency of Loan Interest Rate. That, in accordance with Section 2306.226 of the Act, the Board hereby finds and determines that the interest rate on the Loan will produce the amounts required, together with other available funds, to pay for the Department's costs of operation with respect to the Bonds and the Development and enable the Department to meet its covenants with and responsibilities to the holders of the Bonds.

Section 3.4 No Gain Allowed. That, in accordance with Section 2306.498 of the Act, no member of the Board or employee of the Department may purchase any Bond in the secondary open market for municipal securities.

ARTICLE 4

GENERAL PROVISIONS

Section 4.1 Limited Obligations. That the Bonds and the interest thereon shall be special limited obligations of the Department payable solely from the trust estate created under the Indenture, including the revenues and funds of the Department pledged under the Indenture to secure payment of the Bonds, and under no circumstances shall the Bonds be payable from any other revenues, funds, assets or income of the Department.

Section 4.2 Non-Governmental Obligations. That the Bonds shall not be and do not create or constitute in any way an obligation, a debt or a liability of the State or create or constitute a pledge, giving or lending of the faith or credit or taxing power of the State. Each Bond shall contain on its face a statement to the effect that the State is not obligated to pay the

principal thereof or interest thereon and that neither the faith or credit nor the taxing power of the State is pledged, given or loaned to such payment.

Section 4.3 Effective Date. That this Resolution shall be in full force and effect from and upon its adoption.

Section 4.4 Notice of Meeting. This Resolution was considered and adopted at a meeting of the Governing Board that was noticed, convened, and conducted in full compliance with the Texas Open Meetings Act, Chapter 551 of the Texas Government Code, and with §2306.032 of the Texas Government Code, and the March 16, 2020 action by the Governor of the State of Texas under Section 418.016, Texas Government Code, suspending certain provisions of the Texas Open Meetings Act, regarding meetings of the Governing Board.

PASSED AND APPROVED this 21st day of May, 2020.

EXHIBIT A

Description of Development

Borrower: 333 Holly Preservation, LP, a Texas limited partnership

Development: The Development is a 332-unit affordable, multifamily housing development known as 333 Holly, located at 333 Holly Creek Court, The Woodlands, Montgomery County, TX 77381. It consists of twenty four (24) residential apartment buildings and one (1) office/community building with approximately 269,756 net rentable square feet. The unit mix will consist of:

108	one-bedroom/one-bath units
80	two-bedroom/one-bath units
88	two-bedroom/two-bath units
56	three-bedroom/two-bath units
<hr/>	
332	Total Units

Unit sizes will range from approximately 625 square feet to approximately 1,062 square feet.

20611 333 Holly - Application Summary

REAL ESTATE ANALYSIS DIVISION

May 14, 2020

PROPERTY IDENTIFICATION			RECOMMENDATION					
Application #	20611		TDHCA Program	Request	Recommended			
Development	333 Holly		LIHTC (4% Credit)	\$2,484,301	\$2,484,301	\$7,483/Unit	\$0.99	
City / County	The Woodlands / Montgomery							
Region/Area	6 / Urban							
Population	General							
Set-Aside	Income Averaging							
Activity	Acquisition/Rehab	1982-1984	Private Activity Bonds	\$36,800,000	3.52%	35	17	1st

KEY PRINCIPAL / SPONSOR		
<p>• Wes Larmore / The Related Companies, LP</p>		
Related Parties	Contractor - TBD	Seller - No



UNIT DISTRIBUTION			INCOME AVERAGING		
# Beds	# Units	% Total	Income	# Units	% Total
Eff	-	0%	30%	-	0%
1	108	33%	40%	86	26%
2	168	51%	50%	53	16%
3	56	17%	60%	98	30%
4	-	0%	80%	95	29%
5	-	0%	MR	-	0%
TOTAL	332	100%	TOTAL	332	100%

PRO FORMA FEASIBILITY INDICATORS			
Pro Forma Underwritten		Applicant's Pro Forma	
Debt Coverage	✓ 1.25	Expense Ratio	✓ 38.6%
Breakeven Occ.	✓ 82.3%	Breakeven Rent	\$1,064
Average Rent	\$1,216	B/E Rent Margin	✓ \$152
Property Taxes	\$864/unit	Exemption/PILOT	50%
Total Expense	\$5,325/unit	Controllable	\$3,118/unit



MARKET FEASIBILITY INDICATORS			
Gross Capture Rate (10% Maximum)		✓ 3.8%	
Highest Unit Capture Rate	⚠ 41%	3 BR/60%	22
Dominant Unit Cap. Rate	⚠ 18%	2 BR/60%	47
Premiums (↑60% Rents)	N/A	N/A	
Rent Assisted Units	139	42% Total Units	
DEVELOPMENT COST SUMMARY			
Costs Underwritten		TDHCA's Costs - Based on PCA	
Avg. Unit Size	813 SF	Density	19.4/acre
Acquisition		\$112K/unit	\$37,153K
Building Cost	\$50.89/SF	\$41K/unit	\$13,727K
Hard Cost		\$52K/unit	\$17,146K
Total Cost		\$220K/unit	\$73,162K
Developer Fee	\$8,805K	(41% Deferred)	Paid Year: 6
Contractor Fee	\$2,400K	30% Boost	Yes
REHABILITATION COSTS / UNIT			
Site Work	\$4K	8%	Finishes/Fixture \$23K 44%
Building Shell	\$13K	24%	Amenities \$1K 3%
HVAC	\$4K	8%	Total Exterior \$18K 39%
Appliances	\$2K	4%	Total Interior \$29K 61%

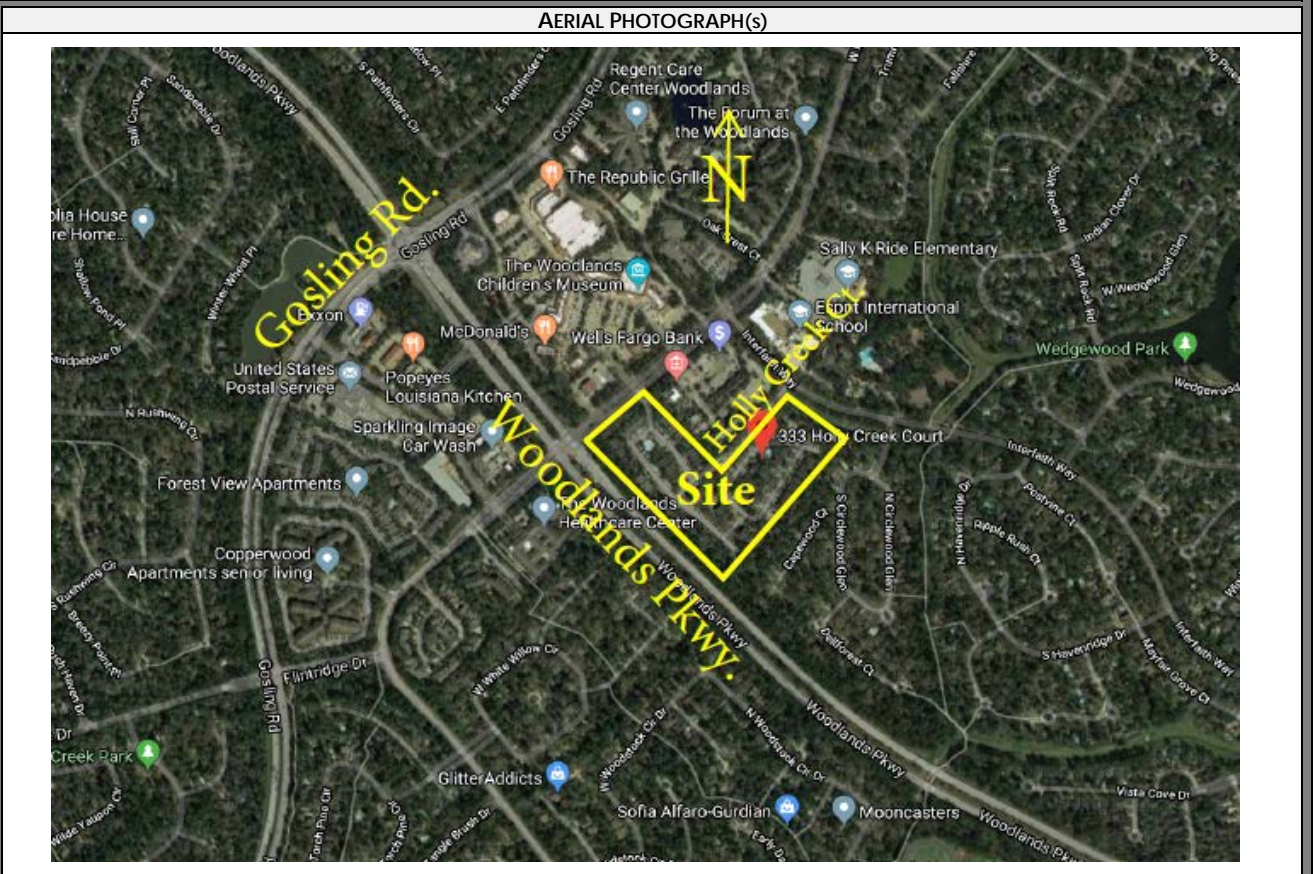
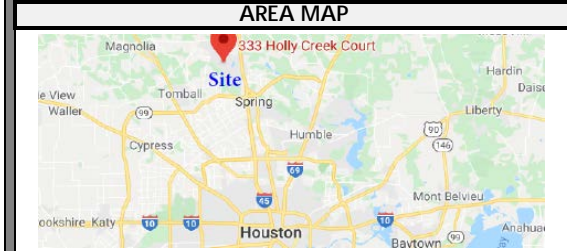
DEBT (Must Pay)					CASH FLOW DEBT / GRANT FUNDS					EQUITY / DEFERRED FEES		
Source	Term	Rate	Amount	DCR	Source	Term	Rate	Amount	DCR	Source	Amount	
Wells Fargo Multifamily Capital	17/35	3.52%	\$36,800,000	1.53						Wells Fargo	\$24,592,119	
										333 Holly Developer, LLC	\$3,569,546	
										TOTAL EQUITY SOURCES	\$28,161,665	
										TOTAL DEBT SOURCES	\$45,000,000	
TOTAL DEBT (Must Pay)			\$45,000,000		CASH FLOW DEBT / GRANTS				\$0		TOTAL CAPITALIZATION	\$73,161,665

CONDITIONS

- 1 Receipt and acceptance before Determination Notice:
 - a: Evidence of a combined HAP Contract renewal or documentation from the third party administrator evidencing their approval of the contract renewal with rents increased to the current market rents presented in this application.
 - b: A revised term sheet from permanent lender that acknowledges Supportive Services pursuant to §11.302(d)(2)(K)(ii).
 - 2 Receipt and acceptance by Cost Certification:
 - Certification from the Appraisal District that project qualifies for a 50% property tax exemption.
 - 3 Documentation at Cost Certification clearing environmental issues identified in the ESA report, specifically:
 - Certification of comprehensive testing for asbestos; that any appropriate abatement procedures were implemented; and that any remaining asbestos-containing materials are being managed in accordance with an acceptable Operations and Maintenance (O&M) program.
 - Certification of comprehensive testing for mold, and that any appropriate abatement procedures were implemented by a qualified abatement company; and certification that a Mold, Moisture & Minimization Plan has been implemented.
- Should any terms of the proposed capital structure change or if there are material changes to the overall development plan or costs, the analysis must be re-evaluated and adjustment to the credit allocation and/or terms of other TDHCA funds may be warranted.

BOND RESERVATION / ISSUER	
Issuer	TDHCA
Expiration Date	11/3/2020
Bond Amount	\$36,800,000
BRB Priority	Priority 3
Bond Structure	Fannie Mae MBS
% Financed with Tax-Exempt Bonds	59.5%

RISK PROFILE	
STRENGTHS/MITIGATING FACTORS	
o	42% of the units (139) are covered under HAP contracts
o	Gross capture rate of 3.8% for HTC units not covered under a HAP contract
o	Renovation should help maintain occupancy
o	Developer/Owner's construction and management experience with Texas HTC projects
WEAKNESSES/RISKS	
o	Project relies on property tax exemption for feasibility
o	38 year old development may have less appeal
o	Potential unforeseen deferred maintenance





DEVELOPMENT IDENTIFICATION

TDHCA Application #: **20611** Program(s): **TDHCA Bonds/4% HTC**

333 Holly

Address/Location: 333 Holly Creek Court

City: The Woodlands County: Montgomery Zip: 77381

Population: General Program Set-Aside: General Area: Urban

Activity: Acquisition/Rehab Building Type: Garden (Up to 4-story) Region: 6

Analysis Purpose: New Application - Initial Underwriting

ALLOCATION

TDHCA Program	REQUEST				RECOMMENDATION				
	Amount	Interest Rate	Amort	Term	Amount	Interest Rate	Amort	Term	Lien
Private Activity Bonds	\$36,800,000	3.52%	35	17	\$36,800,000	3.52%	35	17	1st
LIHTC (4% Credit)	\$2,484,301				\$2,484,301				

CONDITIONS

- 1 Receipt and acceptance before Determination Notice:
 - a: Evidence of a combined HAP Contract renewal or documentation from the third party administrator evidencing their approval of the contract renewal with rents increased to the current market rents presented in this application.
 - b: A revised term sheet from permanent lender that acknowledges Supportive Services pursuant to §11.302(d)(2)(K)(ii).
- 2 Receipt and acceptance by Cost Certification:
 - Certification from the Appraisal District that project qualifies for a 50% property tax exemption.
- 3 Documentation at Cost Certification clearing environmental issues identified in the ESA report, specifically:
 - Certification of comprehensive testing for asbestos; that any appropriate abatement procedures were implemented; and that any remaining asbestos-containing materials are being managed in accordance with an acceptable Operations and Maintenance (O&M) program.
 - Certification of comprehensive testing for mold, and that any appropriate abatement procedures were implemented by a qualified abatement company; and certification that a Mold, Moisture & Minimization Plan has been implemented.

Should any terms of the proposed capital structure change or if there are material changes to the overall development plan or costs, the analysis must be re-evaluated and adjustment to the credit allocation and/or terms of other TDHCA funds may be warranted.

SET-ASIDES

TDHCA SET-ASIDES for HTC LURA		
Income Limit	Rent Limit	Number of Units
40% of AMI	40% of AMI	86
50% of AMI	50% of AMI	53
60% of AMI	60% of AMI	98
80% of AMI	80% of AMI	95

DEVELOPMENT SUMMARY

Subject is an existing 332 unit family property that was built in 2 phases, Phase I in 1982 and Phase II in 1984. It is situated in the southeastern area of The Woodlands, within a 6 mile radius of the entire community. Location is proximate to schools, medical services, recreation, shopping and potential employers. The Woodlands is a Census Designated Place about 30 miles north of Houston via IH-45. Although it began as a bedroom community, it also became home to several corporate campuses, including Chevron Phillips Chemical, Huntsman Corporation, Woodforest National Bank, Baker Hughes, McDermott International and Halliburton. As of the end of 2018, it had a population of 117,305.

Applicant's budgeted renovations include site work and building cost that equal \$47K/unit.

Out of the unit mix, 139 (42%) are currently covered by HAP contracts (one contract on 31 units in the original Phase I and a separate contract on 108 units in Phase II) that will be continued with the new ownership.

RISK PROFILE

STRENGTHS/MITIGATING FACTORS	
▫	42% of the units (139) are covered under HAP contracts
▫	Gross capture rate of 3.8% for HTC units not covered under a HAP contract
▫	Renovation should help maintain occupancy
▫	Developer/Owner's construction and management experience with Texas HTC projects

WEAKNESSES/RISKS	
▫	Project relies on property tax exemption for feasibility
▫	38 year old development may have less appeal
▫	Potential unforeseen deferred maintenance
▫	

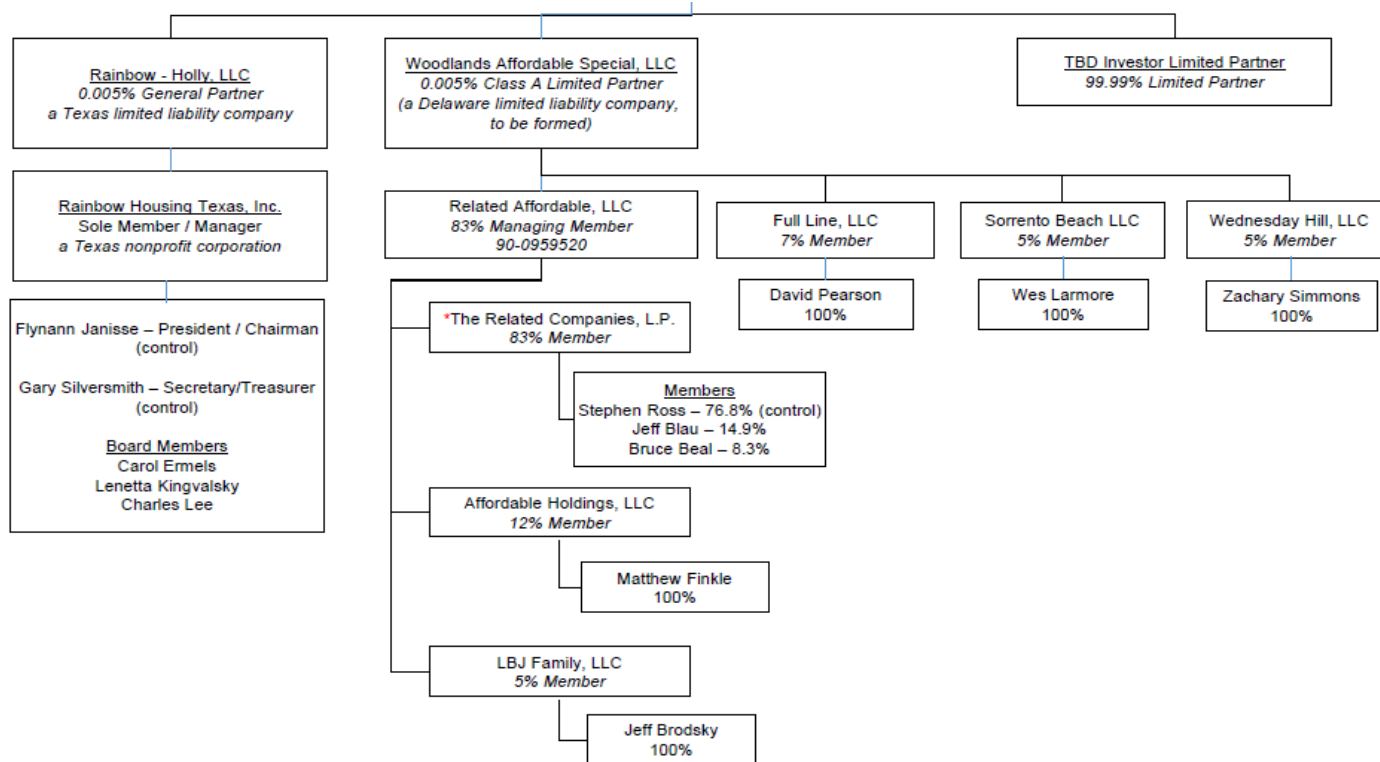
DEVELOPMENT TEAM

PRIMARY CONTACTS

Name: Wes Larmore
 Phone: (213) 634-1566
 Relationship: Sponsor/Developer

Name: _____
 Phone: _____
 Relationship: _____

OWNERSHIP STRUCTURE



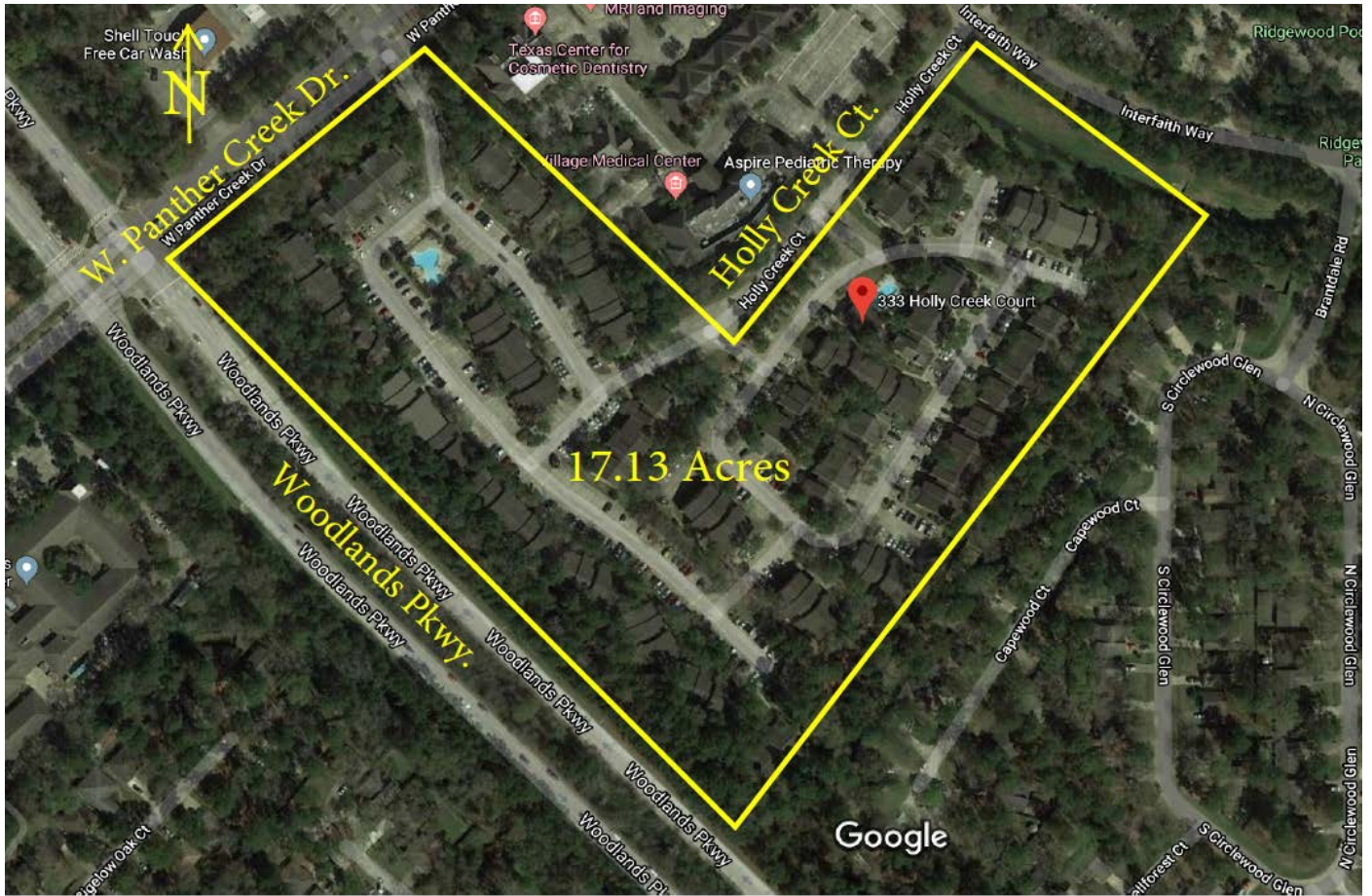
- Applicant, Developer, Cost Estimator and Property Manager are related entities.
- The Related Companies organization was founded by Stephen Ross in 1972. Today, Related owns and operates a portfolio of assets valued at over \$30 billion. With offices in Boston, Chicago, Los Angeles, San Francisco, South Florida, Washington, D.C., Abu Dhabi, London and Shanghai, they manage an operating portfolio that includes luxury, affordable and workforce apartments, commercial, retail and mixed-use developments. Related Affordable, LLC is a subsidiary of The Related Companies, L.P., and has been involved with the development of over 27 HTC projects in Texas.
- Rainbow Housing Texas, Inc. is a CHDO started in 1999 and is an affiliate of Rainbow Housing Assistance Corporation. For more information visit rainbowhousing.org.

DEVELOPMENT SUMMARY

AERIAL



SITE PLAN



Comments:

Detention ponds are not utilized for storm water runoff. Drainage is provided by subsurface concrete piping to the municipal sewer main.

Site has 3 points of access off of Holly Creek Ct. with additional access off of W. Panther Creek Dr.

Lot design accommodates building placement to provide close-in, open surface parking at no cost to the residents. Parking ratio is 1.5/unit (513 spaces).

TYPICAL BUILDING ELEVATION



Comments:

Built in two (2) phases (152 units/1982 & 180 units/1984), subject is comprised of 24 two-story garden-style buildings along with a stand-alone clubhouse. All buildings are wood-framed on reinforced concrete foundations with pitched shingle roofs. Exteriors are a combination of brick and painted fiber cement lap board siding.

RELOCATION PLAN

Planned renovation activities will require tenants to be moved into another unit onsite for a period of five to seven days while work is being done on their unit. The scope of work should not require any offsite tenant relocation or any prolonged tenant absences. Moving services will be provided along with additional assistance for any tenants that may require it.

Vacant units will be renovated during the first month. When the rehabilitation of these units is complete, tenants will be relocated into these apartments in accordance with a posted phasing schedule.

Every effort will be made to avoid any temporary displacement of existing tenants. Arrangements will be made to accommodate tenants during the time their unit is unavailable, including activities and food in the community room. If renovation activities require offsite accommodations, affected tenants will be moved to decent, safe and sanitary hotel/motel units that will be adequate for their needs.

Applicant has budgeted \$600K (\$1,807/unit) to cover possible relocation expenses.

BUILDING CONFIGURATION

Building Type	#REF1	#REF1	ARATE			PHASE							Total Buildings
Floors/Stories	2	2	2	2	2	2	2	2	2	2			
Number of Bldgs	3	2	3	2	1	7	1	3	1	1			24
Units per Bldg	20	20	16	16	8	8	16	16	16	8			
Total Units	60	40	48	32	8	56	16	48	16	8			332
Avg. Unit Size (SF)	813 sf		Total NRA (SF)				269,756		Common Area (SF)				3,931

SITE AND ACQUISITION

Site Acreage: Development Site: 17.13 acres Density: 19.4 units/acre
Site Control: 17.1 **Site Plan:** 17.1 **Appraisal:** 17.1 **ESA:** 17.1

Control Type: Purchase and Sale Agreement Contract Expiration: 6/19/2020

Tract 1: 7.48 acres
 Tract 2: 9.65 acres
 Tract 3: 8.29 acres

Total Acquisition: 25.42 acres Cost: \$63,000,000
 Development Site: 17.13 acres Cost: \$37,153,052 \$111,907 per unit

Seller: PHR Woodlands Properties, L.L.C.
 Buyer: Related Affordable, LLC
 Assignee: _____

Related-Party Seller/Identity of Interest: No

Comments:
 Purchase and Sale Agreement ("PSA") includes subject and Sponsor's other proposed project in The Woodlands, TDHCA #20612 - The Pines. The PSA explicitly states that the Purchaser is obligated to purchase both properties on the Closing Date unless otherwise agreed to by Seller at its sole discretion.
 A price of \$37,153,052 has been allocated to this project as allowed by the contract. This price factors in a credit (reduction) of \$846,948 that is stated in the contract to compensate for fire damage that occurred in building six (6).
 Rainbow Housing Texas, Inc. is the sole member of the General Partner for this project. Their status as a non-profit CHDO is expected to provide a 50% property tax exemption.

APPRAISED VALUE

Appraiser: Gill Group Date: 12/23/2019

Land as Vacant: 17.13 acres	<u>\$2,450,000</u>	Per Unit:	<u>\$7,380</u>
Existing Buildings: (as-is)	<u>\$54,725,000</u>	Per Unit:	<u>\$164,834</u>
Total Development: (as-is)	<u>\$57,175,000</u>	Per Unit:	<u>\$172,214</u>

Comments:

Appraised value was derived using the income capitalization approach. The appraiser determined a 6.00% market capitalization rate by giving the most weight to sales available in subject's market area. That rate was then adjusted down to 5.50% in order to compensate for the HAP contract rental subsidies on 139 of the units.

GENERAL INFORMATION

Flood Zone:	<u>X</u>	Scattered Site?	<u>No</u>
Zoning:	<u>No Zoning</u>	Within 100-yr floodplain?	<u>No</u>
Re-Zoning Required?	<u>No</u>	Utilities at Site?	<u>Yes</u>
Year Constructed:	<u>1982-1984</u>	Title Issues?	<u>No</u>

Surrounding Uses:

Subject is located in a mixed-use area with commercial properties to the north and west, and single family neighborhoods to the south and east.

HIGHLIGHTS of ENVIRONMENTAL REPORTS

Provider: Partner Engineering and Science, Inc. ("Partner") Date: 6/27/2019

Recognized Environmental Conditions (RECs) and Other Concerns:

- No REC's were found.
- Partner conducted a limited evaluation of suspect asbestos containing materials ("ACMs") including drywall systems, vinyl flooring and flooring mastic. The materials observed were not friable and in good condition. However, a comprehensive asbestos survey was recommended prior to any disturbance of the existing construction materials.
- Building 6 was damaged by a fire in early 2019 and is currently down. Fire and water damage were observed with evidence of microbial growth. Therefore Partner recommends that a Mold, Moisture & Minimization Plan be implemented.

MARKET ANALYSIS

Provider: Gill Group, Inc.
 Contact: Samuel T Gill

Date: 7/23/2019
 Phone: (573) 624-6614

Primary Market Area (PMA): 31 sq. miles 3 mile equivalent radius
 The PMA consists of 13 census tracts around the Woodlands.

ELIGIBLE HOUSEHOLDS BY INCOME								
Montgomery County Income Limits								
HH Size		1	2	3	4	5	6	7+
40% AMGI	Min	\$1	\$1	\$1	\$1	---	---	---
	Max	\$21,400	\$24,440	\$27,480	\$30,520	---	---	---
50% AMGI	Min	\$1	\$1	\$1	\$1	\$1	\$1	---
	Max	\$26,750	\$30,550	\$34,350	\$38,150	\$41,250	\$44,300	---
60% AMGI	Min	\$25,740	\$25,740	\$30,840	\$30,840	\$35,700	\$35,700	---
	Max	\$32,100	\$36,660	\$41,220	\$45,780	\$49,500	\$53,160	---
80% AMGI	Min	\$30,480	\$30,480	\$37,230	\$37,230	\$47,610	\$47,610	---
	Max	\$42,800	\$48,880	\$54,960	\$61,040	\$66,000	\$70,880	---

AFFORDABLE HOUSING INVENTORY						
Competitive Supply (Proposed, Under Construction, and Unstabilized)						
File #	Development	In PMA?	Type	Target Population	Comp Units	Total Units
	None					
Other Affordable Developments in PMA since 2015						
20403	The Pines		A/R	General	n/a	152
Stabilized Affordable Developments in PMA (pre-2015)					Total Units	1,506
					Total Developments	6

Proposed, Under Construction, and Unstabilized Competitive Supply:

The Pines (#20612) is a 100% HAP rehab by the same developer located one mile south of the Subject. Due to the presence of HAP contact, the units are not considered competitive.

OVERALL DEMAND ANALYSIS				
	Market Analyst		Underwriter	
	HTC	Assisted	HTC	Assisted
Total Households in the Primary Market Area	32,748		33,438	33,438
Potential Demand from the Primary Market Area	5,550	3,141	4,657	2,501
10% External Demand	555	314	466	250
Potential Demand from Other Sources	0	0	0	0
GROSS DEMAND	6,105	3,455	5,122	2,751
Subject Affordable Units	193	139	193	139
Unstabilized Competitive Units				
RELEVANT SUPPLY	193	139	193	139
Relevant Supply ÷ Gross Demand = GROSS CAPTURE RATE	3.2%	4.0%	3.8%	5.1%
Population:	General	Market Area:	Urban	Maximum Gross Capture Rate: 10%

UNDERWRITING ANALYSIS of PMA DEMAND by AMGI BAND										
AMGI Band	Market Analyst					Underwriter				
	Demand	10% Ext	Subject Units	Comp Units	AMGI Band Capture Rate	Demand	10% Ext	Subject Units	Comp Units	AMGI Band Capture Rate
60% AMGI	3,173	317	98	0	3%	2,231	223	98	0	4%
80% AMGI	4,055	406	95	0	2%	2,426	243	95	0	4%

Demand Analysis:

Capture rate limits do not apply to existing affordable housing that is at least 50% occupied and that provides a leasing preference to existing tenants. GCR calculation separated demand for the HTC units and the 139 HAP units. HAP demand includes household income from \$1 to the minimum HTC income of \$25,740. AMGI band and unit capture rates are only for the non-HAP units.

UNDERWRITING ANALYSIS of PMA DEMAND by UNIT TYPE										
Unit Type	Market Analyst					Underwriter				
	Demand	10% Ext	Subject Units	Comp Units	Unit Capture Rate	Demand	10% Ext	Subject Units	Comp Units	Unit Capture Rate
1 BR/60%	709	71	29	0	4%	372	37	29	0	7%
1 BR/80%	460	46	28	0	6%	826	83	28	0	3%
2 BR/60%	149	15	47	0	29%	238	24	47	0	18%
2 BR/80%	337	34	45	0	12%	536	54	45	0	8%
3 BR/60%	147	15	22	0	14%	48	5	22	0	41%
3 BR/80%	133	13	22	0	15%	263	26	22	0	8%

Market Analyst Comments:

The market area rental percentage is higher than the national renter percentage. (p. 57)

The subject's current occupancy rate is 93 percent. The comparables' occupancy rates range from 97 to 98 percent. (p. 77)

Underwriter Comments:

Affordable properties still monitored in the PMA average 99% occupancy.

Revisions to Market Study:	1
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OPERATING PRO FORMA

SUMMARY- AS UNDERWRITTEN (Applicant's Pro Forma)

NOI:	\$2,807,190	Avg. Rent:	\$1,216	Expense Ratio:	38.6%
Debt Service:	\$2,237,461	B/E Rent:	\$1,064	Controllable Expenses:	\$3,118
Net Cash Flow:	\$569,729	UW Occupancy:	94.0%	Property Taxes/Unit:	\$864
Aggregate DCR:	1.25	B/E Occupancy:	82.3%	Program Rent Year:	2019

Subject was originally built in 2 phases and there are currently 2 corresponding HAP contracts, with one covering 31 units in phase I and another covering 108 units in phase II. Sponsor has indicated that they will work with HUD to obtain a new 20-year contract through an Option 1b mark-up-to-market renewal that covers all 139 HAP units.

Sponsor's Pro Forma reflects the anticipated increase in HAP rents outlined as follows:

Unit Type	Current Net HAP Rent	Anticipated Net HAP Rent	Increase	Variance
1BR/1BA	\$847	\$1,275	\$428	51%
2BR/1BA	\$990	\$1,445	\$455	46%
2BR/2BA	\$1,097	\$1,575	\$478	44%
3BR/2BA	\$1,210	\$1,810	\$600	50%

While anticipated rent increases are significant, they are equivalent to the current market rent conclusions reported in the March 2020 Market Study done for this project.

All of the units are restricted and Sponsor has elected the income averaging option. The average of the imputed income limitations being designated is 58.95% percent of AMI (within the 60% threshold).

Sponsor indicated that Rents on the 80% units are being projected at less than max program to mirror the permanent lender's underwriting.

With Rainbow Housing Texas, Inc. ("RHT") being the sole member of the GP, Sponsor is assuming a 50% CHDO property tax exemption. However, with no exemption, valuing the property using Montgomery County's 10% low income housing cap rate results in a projected property tax of \$523K. All else equal, DCR would drop to 1.09, indicating that the deal would be infeasible.

Proposed management fee of \$179,280 (3.96%) equates to the HUD underwriting maximum of \$45/unit/month. The lower than typical fee is facilitated by Applicant's related party management company. However, assuming TDHCA's standard of 5% does not affect the feasibility conclusion.

Low management fee and 50% property tax exemption facilitate a lower than typical expense ratio.

As presented, average rent with 1 month concession on both 60% and 80% units is still \$101 above break-even, but concessions are likely unnecessary with subject's program rent units offering a combined 31% overall discount to market rents.

Breakeven occupancy occurs with 59 units vacant (underwritten at 20).

Applicant has budgeted \$60K for Supportive Services on this project. Pursuant to TDHCA underwriting rules, this amount will be included in the DCR calculation at cost certification, regardless if actually incurred.

Underwritten debt service includes TDHCA's 10 basis point Bond Administration Fee on the tax-exempt bond amount.

Pro Forma exhibits feasibility for over 35 years with total permanent debt at budgeted at a fixed rate of 3.52%. Rate could increase by 63 basis points (to 4.15%) before first year DCR would drop below the minimum 1.15 threshold.

As underwritten, long-term Pro Forma exhibits a 15 year residual cash flow of \$9.3M after repayment of deferred developer fee.

Related-Party Property Management Company: Yes

Revisions to Rent Schedule: 0

Revisions to Annual Operating Expenses: 2

DEVELOPMENT COST EVALUATION

SUMMARY- AS UNDERWRITTEN (TDHCA's Costs- Based on PCA)

Acquisition	\$92,939/ac	\$111,907/unit	\$37,153,052	Contractor Fee	\$2,400,401
Off-site + Site Work		\$5,602/unit	\$1,860,000	Soft Cost + Financing	\$6,277,405
Building Cost	\$50.89/sf	\$41,346/unit	\$13,727,020	Developer Fee	\$8,804,679
Contingency	10.00%	\$4,695/unit	\$1,558,702	Reserves	\$1,380,406
Total Development Cost	\$220,366/unit	\$73,161,665		Rehabilitation Cost	\$46,949/unit
Qualified for 30% Basis Boost?		Located in a Small Area Difficult Development Area (SADDA)			

Acquisition:

This property and Sponsor's other Woodlands project at 3451 Tangle Brush Drive (TDHCA #20612) are being sold under one Purchase and Sale Agreement ("PSA") for a purchase price of \$63M. The PSA specifies a \$40M price for this property and a \$23M price for 3451 Tangle Brush Drive. However, Sponsor has allocated a total acquisition cost of \$37.2M for this project and \$25M for 3451 Tangle Brush Drive, for a total of \$62.2M.

Off-site:

None.

Site Work:

Budgeted site work cost of \$1.4M (\$4.3K/unit) is comprised of \$15K for fine grading, \$200K for concrete (sidewalk and other repair), \$200K for paving (parking lot repair) and \$1M for on-site utilities (underground plumbing).

Amenity cost of \$445K (\$1.3/unit) includes \$90K for landscaping, \$70K for recreational areas, \$35K for fencing and \$250K site security/accessibility.

Building Cost:

Renovation costs include the reconstruction/repair of Building 6, which was damaged by a fire in early 2019 and is currently down.

REHABILITATION COSTS / UNIT / % HARD COST

Site Work	\$1,415,000	\$4,262/unit	8%	Finishes/Fixtures	\$7,504,520	\$22,604/unit	44%
Building Shell	\$4,158,000	\$12,524/unit	24%	HVAC	\$1,442,000	\$4,343/unit	8%
Amenities	\$445,000	\$1,340/unit	3%	Appliances	\$622,500	\$1,875/unit	4%
Total Exterior	\$6,018,000	\$18,127/unit	39%	Total Interior	\$9,569,020	\$28,822/unit	61%

Site and Exterior renovations will include:

Site Improvements

- Landscaping
- Grading
- Pool upgrades
- Playground
- Mailboxes
- Security
- Fencing
- Accessibility
- Parking lot - repair/fill pot holes - seal/stripe
- Concrete - repair damaged walks and curbs

Common Areas

- Laundry Rooms
- Community Room - ADA upgrades, addition
- DHW (central gas-fired boilers)
- On-site utilities (underground plumbing)
- Signage

Building Envelope

- Entry doors w/hardware - front, rear & storage
- Stairs
- Roof repairs
- Windows & patio doors
- Siding (Hardi), gutters, fascia, windows & sliding doors

Interior improvements to every unit will include:

Bathrooms

- Vanities
- Medicine cabinets
- Tubs & surrounds / valves & showerheads
- Toilet replacement
- Toilet accessories
- New GFI outlets
- Lighting upgrades

Kitchens

- Cabinet replacements
- Counters
- Refrigerators - Energy Star
- Stoves
- Dishwashers and new electrical hook-up
- Suppression pucks
- Range hoods
- Lighting replacement
- New GFI outlets
- Sinks - stainless steel
- Faucets - single lever

General Interior (BR/LR/DR)

- Misc. painting/drywall repairs
- Plumbing
- ADA work
- Flooring replacement - all units
- Interior doors/hardware
- Smoke detectors
- Lighting
- HVAC - 16.5 SEE

Sponsor's exterior and interior costs are consistent with costs determined by the SCR provider.

Soft Costs:

As expected on a rehab, A&E costs are lower than typical at \$1.2K/unit, as are total soft costs at \$7.3K/unit (only 3.31% of total development cost).

Developer Fee:

Developer fee is overstated by \$25K.

Reserves:

Sponsor's total capital reserves represent approximately 4 months of operating expenses and debt service. No reserves are being transferred with the acquisition of the property.

Credit Allocation Supported by Costs:

Total Development Cost	Adjusted Eligible Cost	Credit Allocation Supported by Eligible Basis
\$73,161,665	\$67,560,036	\$2,532,997

Related-Party Contractor: No

Related-Party Cost Estimator: Yes

Revisions to Development Cost Schedule:

2

UNDERWRITTEN CAPITALIZATION

BOND RESERVATION

Issuer	Amount	Reservation Date	Priority
TDHCA	\$36,800,000	5/7/2020	Priority 3
Closing Deadline		Bond Structure	
11/3/2020		Fannie Mae MBS	

Percent of Cost Financed by Tax-Exempt Bonds	59.5%
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Comments:

The tax exempt bonds are projected to finance approximately 60% of the aggregate basis of the development, which exceeds the minimum 50% requirement to qualify for 4% tax credits under IRC§142.

INTERIM SOURCES

Funding Source	Description	Amount	Rate	LTC
Wells Fargo Multifamily Capital	Tax Exempt Bonds	\$36,800,000	3.52%	50%
Wells Fargo Multifamily Capital - Taxable Loan	Taxable Loan Portion	\$8,200,000	3.51%	11%
Wells Fargo	HTC	\$20,903,301	\$0.99	29%
333 Holly Developer, LLC	Deferred Fee	\$6,234,970	0.00%	9%
Reserves Funded Post Construction	Funded Reserves	\$1,048,406	0.00%	1%
		\$73,186,677	Total Sources	

PERMANENT SOURCES

Debt Source	PROPOSED				UNDERWRITTEN				
	Amount	Interest Rate	Amort	Term	Amount	Interest Rate	Amort	Term	LTC
Wells Fargo Multifamily Capital	\$36,800,000	3.52%	35	17	\$36,800,000	3.52%	35	17	50%
Wells Fargo Multifamily Capital - Taxable Loan	\$8,200,000	3.51%	35	17	\$8,200,000	3.51%	35	17	11%
Total	\$45,000,000				\$45,000,000				

Comments:

TDHCA will make the tax-exempt bond loan through Fannie Mae's M.TEB Program (Mortgage Backed Securities as Tax Exempt Bond Collateral) and Wells Fargo will make the taxable loan through Fannie Mae's DUS (Delegated Underwriting & Servicing) conventional loan delivery for each project.

The tax-exempt and taxable loan for each project will be sized, on an aggregate basis, to meet the same underwriting standards as if there were one tax-exempt loan for that project.

The project-specific tax-exempt loan and taxable loan will be cross defaulted.

There will be separate loan agreements, notes and mortgages for the tax-exempt and taxable loan for this project and for 20612 - The Pines.

The bond mortgage for each project will be recorded first, the conventional mortgage will be recorded second.

The tax-exempt MTEB and conventional MBS will both be priced as first lien loans due to the cross default provision.

Equity & Deferred Fees	PROPOSED			UNDERWRITTEN			
	Amount	Rate	% Def	Amount	Rate	% TC	% Def
Wells Fargo	\$24,592,119	\$0.99		\$24,592,119	\$0.99	34%	
333 Holly Developer, LLC	\$3,594,558		41%	\$3,569,546		5%	41%
Total	\$28,186,677			\$28,161,665			
				\$73,161,665	Total Sources		

Credit Price Sensitivity based on current capital structure	
\$1.134	Maximum Credit Price before the Development is oversourced and allocation is limited
\$0.779	Minimum Credit Price below which the Development would be characterized as infeasible

Revisions to Sources Schedule: 2

CONCLUSIONS

Recommended Financing Structure:

Gap Analysis:	
Total Development Cost	\$73,161,665
Permanent Sources (debt + non-HTC equity)	\$45,000,000
Gap in Permanent Financing	\$28,161,665

Possible Tax Credit Allocations:	Equity Proceeds	Annual Credits
Determined by Eligible Basis	\$25,074,164	\$2,532,997
Needed to Balance Sources & Uses	\$28,161,665	\$2,844,897
Requested by Applicant	\$24,592,119	\$2,484,301

	RECOMMENDATION	
	Equity Proceeds	Annual Credits
Tax Credit Allocation	\$24,592,119	\$2,484,301

	Amount	Interest Rate	Amort	Term	Lien
TDHCA-Issued Bonds	\$36,800,000	3.52%	35	17	1st

Deferred Developer Fee	\$3,569,546	(41% deferred)
Repayable in	6 years	

Comments:

Credit allocation is limited to \$2,484,301 as requested by Applicant.
 Applicant may request additional credits at cost certification based on actual costs.

Underwriter:	<u>Gregg Kazak</u>
Manager of Real Estate Analysis:	<u>Thomas Cavanagh</u>
Director of Real Estate Analysis:	<u>Brent Stewart</u>

UNIT MIX/RENT SCHEDULE

333 Holly, The Woodlands, TDHCA Bonds/4% HTC #20611

LOCATION DATA

CITY:	The Woodlands
COUNTY:	Montgomery
Area Median Income	\$76,300
PROGRAM REGION:	6

UNIT DISTRIBUTION

# Beds	# Units	% Total	Assisted	MDL	Income	# Units	% Total
Eff	-	0.0%	0	0	20%	-	0.0%
1	108	32.5%	51	0	30%	-	0.0%
2	168	50.6%	76	0	40%	86	25.9%
3	56	16.9%	12	0	50%	53	16.0%
4	-	0.0%	0	0	60%	98	29.5%
5	-	0.0%	0	0	70%	-	0.0%
					80%	95	28.6%
					MR	-	0.0%
TOTAL	332	100.0%	139	-	TOTAL	332	100.0%

Pro Forma ASSUMPTIONS

Revenue Growth	2.00%
Expense Growth	3.00%
Basis Adjust	130%
Applicable Fraction	100.00%
APP % Acquisition	3.34%
APP % Construction	3.34%
Average Unit Size	813 sf

UNIT MIX / MONTHLY RENT SCHEDULE

HTC		RENT ASSISTED UNIT		UNIT MIX				APPLICABLE PROGRAM RENT			APPLICANT'S PRO FORMA RENTS				TDHCA PRO FORMA RENTS				MARKET RENTS		
Type	Gross Rent	Type	Gross Rent	# Units	# Beds	# Baths	NRA	Gross Rent	Utility Allow	Max Net Program Rent	Delta to Max	Rent psf	Net Rent per Unit	Total Monthly Rent	Total Monthly Rent	Rent per Unit	Rent psf	Delta to Max	Underwritten	Mkt Analyst	
TC 40%	\$573	HAP	\$1,341	51	1	1.0	625	\$1,341	\$66	\$1,275	\$0	\$2.04	\$1,275	\$65,025	\$65,025	\$1,275	\$2.04	\$0	\$1,275	\$2.04	\$1,275
TC 50%	\$858	HAP	\$1,536	41	2	1.0	775	\$1,536	\$91	\$1,445	\$0	\$1.86	\$1,445	\$59,245	\$59,245	\$1,445	\$1.86	\$0	\$1,445	\$1.86	\$1,445
TC 40%	\$687	HAP	\$1,666	35	2	2.0	918	\$1,666	\$91	\$1,575	\$0	\$1.72	\$1,575	\$55,125	\$55,125	\$1,575	\$1.72	\$0	\$1,575	\$1.72	\$1,575
TC 50%	\$992	HAP	\$1,931	12	3	2.0	1,062	\$1,931	\$121	\$1,810	\$0	\$1.70	\$1,810	\$21,720	\$21,720	\$1,810	\$1.70	\$0	\$1,810	\$1.70	\$1,810
TC 60%	\$859	0	\$0	29	1	1.0	625	\$858	\$66	\$792	\$0	\$1.27	\$792	\$22,968	\$22,968	\$792	\$1.27	\$0	\$1,275	\$2.04	\$1,275
TC 60%	\$1,030	0	\$0	20	2	1.0	775	\$1,028	\$91	\$937	\$0	\$1.21	\$937	\$18,740	\$18,740	\$937	\$1.21	\$0	\$1,445	\$1.86	\$1,445
TC 60%	\$1,030	0	\$0	27	2	2.0	918	\$1,030	\$91	\$939	\$0	\$1.02	\$939	\$25,353	\$25,353	\$939	\$1.02	\$0	\$1,575	\$1.72	\$1,575
TC 60%	\$1,191	0	\$0	22	3	2.0	1,062	\$1,190	\$121	\$1,069	\$0	\$1.01	\$1,069	\$23,518	\$23,518	\$1,069	\$1.01	\$0	\$1,810	\$1.70	\$1,810
TC 80%	\$1,146	0	\$0	28	1	1.0	625	\$1,016	\$66	\$950	\$0	\$1.52	\$950	\$26,600	\$26,600	\$950	\$1.52	\$0	\$1,275	\$2.04	\$1,275
TC 80%	\$1,374	0	\$0	19	2	1.0	775	\$1,241	\$91	\$1,150	\$0	\$1.48	\$1,150	\$21,850	\$21,850	\$1,150	\$1.48	\$0	\$1,445	\$1.86	\$1,445
TC 80%	\$1,374	0	\$0	26	2	2.0	918	\$1,291	\$91	\$1,200	\$0	\$1.31	\$1,200	\$31,200	\$31,200	\$1,200	\$1.31	\$0	\$1,575	\$1.72	\$1,575
TC 80%	\$1,588	0	\$0	22	3	2.0	1,062	\$1,587	\$121	\$1,466	\$0	\$1.38	\$1,466	\$32,252	\$32,252	\$1,466	\$1.38	\$0	\$1,810	\$1.70	\$1,810
TOTALS/AVERAGES:				332			269,756				\$0	\$1.50	\$1,216	\$403,596	\$403,596	\$1,216	\$1.50	\$0	\$1,486	\$1.83	\$1,486

ANNUAL POTENTIAL GROSS RENT:	\$4,843,152	\$4,843,152
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STABILIZED PRO FORMA

333 Holly, The Woodlands, TDHCA Bonds/4% HTC #20611

STABILIZED FIRST YEAR PRO FORMA

	COMPARABLES		Actual FYE 2019	APPLICANT				TDHCA				VARIANCE	
	Database	Other		% EGI	Per SF	Per Unit	Amount	Amount	Per Unit	Per SF	% EGI	%	\$
POTENTIAL GROSS RENT				\$1.50	\$1,216	\$4,843,152	\$4,843,152	\$1,216	\$1.50		0.0%	\$0	
Tenant Charges (Late, application fees)					\$6.02	\$24,000							
Total Secondary Income					\$6.02	\$24,000	\$24,000	\$6.02			0.0%	\$0	
POTENTIAL GROSS INCOME						\$4,867,152	\$4,867,152				0.0%	\$0	
Vacancy & Collection Loss				6.0% PGI		(292,029)	(365,036)	7.5% PGI			-20.0%	73,007	
Rental Concessions						-	-				0.0%	-	
EFFECTIVE GROSS INCOME						\$4,575,123	\$4,502,116				1.6%	\$73,007	

General & Administrative	\$78,092	\$235/Unit	\$120,322	\$362/Unit	\$101,012	\$304/Unit	4.33%	\$0.73	\$596	\$198,000	\$101,012	\$304	\$0.37	2.24%	96.0%	96,988
Management	\$114,485	4.7% EGI	\$132,004	\$398/Unit	\$143,719	\$433/Unit	3.92%	\$0.66	\$540	\$179,280	\$225,106	\$678	\$0.83	5.00%	-20.4%	(45,826)
Payroll & Payroll Tax	\$346,631	\$1,044/Unit	\$420,509	\$1,267/Unit	\$407,168	\$1,226/Unit	8.87%	\$1.51	\$1,223	\$406,000	\$407,168	\$1,226	\$1.51	9.04%	-0.3%	(1,168)
Repairs & Maintenance	\$165,370	\$498/Unit	\$209,390	\$631/Unit	\$183,056	\$551/Unit	3.45%	\$0.59	\$476	\$157,960	\$215,800	\$650	\$0.80	4.79%	-26.8%	(57,840)
Electric/Gas	\$84,828	\$256/Unit	\$51,860	\$156/Unit	\$90,191	\$272/Unit	2.10%	\$0.36	\$289	\$95,893	\$90,191	\$272	\$0.33	2.00%	6.3%	5,702
Water, Sewer, & Trash	\$194,714	\$586/Unit	\$207,740	\$626/Unit	\$211,589	\$637/Unit	3.87%	\$0.66	\$534	\$177,247	\$211,589	\$637	\$0.78	4.70%	-16.2%	(34,342)
Property Insurance	\$105,788	\$0.39 /sf	\$115,059	\$347/Unit	\$107,376	\$323/Unit	1.81%	\$0.31	\$250	\$83,000	\$107,376	\$323	\$0.40	2.39%	-22.7%	(24,376)
Property Tax (@ 50%) 2.1465	\$183,372	\$552/Unit	\$247,303	\$745/Unit	\$299,256	\$901/Unit	6.27%	\$1.06	\$864	\$286,873	\$261,559	\$788	\$0.97	5.81%	9.7%	25,314
Reserve for Replacements	\$97,679	\$294/Unit	\$149,185	\$449/Unit	\$0	\$/Unit	2.18%	\$0.37	\$300	\$99,600	\$99,600	\$300	\$0.37	2.21%	0.0%	-
Supportive Services			\$29,401	\$89/Unit	\$0	\$/Unit	1.31%	\$0.22	\$181	\$60,000	\$60,000	\$181	\$0.22	1.33%	0.0%	-
TDHCA Compliance fees (\$40/HTC unit)			\$12,370	\$37/Unit	\$0	\$/Unit	0.29%	\$0.05	\$40	\$13,280	\$13,280	\$40	\$0.05	0.29%	0.0%	-
TDHCA Bond Compliance Fee			\$0	\$/Unit	\$0	\$/Unit	0.18%	\$0.03	\$25	\$8,300	\$8,300	\$25	\$0.03	0.18%	0.0%	-
Bond Trustee Fees			\$0	\$/Unit	\$0	\$/Unit	0.05%	\$0.01	\$8	\$2,500	\$2,500	\$8	\$0.01	0.06%	0.0%	-
TOTAL EXPENSES							38.64%	\$6.55	\$5,325	\$1,767,933	\$1,803,481	\$5,432	\$6.69	40.06%	-2.0%	\$ (35,548)
NET OPERATING INCOME ("NOI")							61.36%	\$10.41	\$8,455	\$2,807,190	\$2,698,635	\$8,128	\$10.00	59.94%	4.0%	\$ 108,555

CONTROLLABLE EXPENSES									\$3,118/Unit				\$3,090/Unit			
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CAPITALIZATION / TOTAL DEVELOPMENT BUDGET / ITEMIZED BASIS

333 Holly, The Woodlands, TDHCA Bonds/4% HTC #20611

DEBT / GRANT SOURCES															
		APPLICANT'S PROPOSED DEBT/GRANT STRUCTURE							AS UNDERWRITTEN DEBT/GRANT STRUCTURE						
DEBT (Must Pay)	Fee	Cumulative DCR		Pmt	Rate	Amort	Term	Principal	Principal	Term	Amort	Rate	Pmt	Cumulative	
		UW	App											DCR	LTC
Wells Fargo Multifamily Capital		1.47	1.53	\$1,830,212	3.52%	35	17	\$36,800,000	\$36,800,000	17	35	3.52%	\$1,830,212	1.53	50.3%
Wells Fargo Multifamily Capital - Taxable Loan		1.21	1.25	\$407,248	3.51%	35	17	\$8,200,000	\$8,200,000	17	35	3.51%	\$407,248	1.25	11.2%
				\$2,237,460	TOTAL DEBT / GRANT SOURCES			\$45,000,000	\$45,000,000	TOTAL DEBT SERVICE			\$2,237,461	1.25	61.5%

NET CASH FLOW	\$461,175	\$569,730	APPLICANT	NET OPERATING INCOME	\$2,807,190	\$569,729	NET CASH FLOW
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EQUITY SOURCES											
		APPLICANT'S PROPOSED EQUITY STRUCTURE				AS UNDERWRITTEN EQUITY STRUCTURE					
EQUITY / DEFERRED FEES	DESCRIPTION	% Cost	Annual Credit	Credit Price	Amount	Amount	Credit Price	Annual Credit	% Cost	Annual Credits per Unit	Allocation Method
333 Holly Developer, LLC	Deferred Developer Fees	4.9%	(41% Deferred)		\$3,594,558	\$3,569,546	(41% Deferred)		4.9%	Total Developer Fee: \$8,804,679	
Additional (Excess) Funds Req'd		0.0%			\$0				0.0%		
TOTAL EQUITY SOURCES		38.5%			\$28,186,677	\$28,161,665			38.5%		

TOTAL CAPITALIZATION	\$73,186,677	\$73,161,665	15-Yr Cash Flow after Deferred Fee:	\$9,340,468
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DEVELOPMENT COST / ITEMIZED BASIS												
		APPLICANT COST / BASIS ITEMS					TDHCA COST / BASIS ITEMS					COST VARIANCE
	Acquisition	New Const. Rehab	Total Costs		Total Costs	Total Costs		Eligible Basis		%	\$	
								New Const. Rehab	Acquisition			
Land Acquisition			\$7,380 / Unit	\$2,450,000	\$1,592,042	\$4,795 / Unit				53.9%	\$857,958	
Building Acquisition	\$34,703,052		\$104,527 / Unit	\$34,703,052	\$35,561,010	\$107,111 / Unit		\$34,703,052		-2.4%	(\$857,958)	
Off-Sites		\$0	\$ / Unit	\$0	\$0	\$ / Unit		\$0		0.0%	\$0	
Site Work		\$1,415,000	\$4,262 / Unit	\$1,415,000	\$1,415,000	\$4,262 / Unit		\$1,415,000		0.0%	\$0	
Site Amenities		\$445,000	\$1,340 / Unit	\$445,000	\$445,000	\$1,340 / Unit		\$445,000		0.0%	\$0	
Building Cost	\$13,727,020	\$50.89 /sf	\$41,346/Unit	\$13,727,020	\$13,727,020	\$41,346/Unit	\$50.89 /sf	\$13,727,020		0.0%	\$0	
Contingency	\$1,558,702	10.00%	10.00%	\$1,558,702	\$1,558,702	10.00%	10.00%	\$1,558,702		0.0%	\$0	
Contractor Fees	\$2,400,401	14.00%	14.00%	\$2,400,401	\$2,400,401	14.00%	14.00%	\$2,400,401		0.0%	\$0	
Soft Costs	25,000	\$1,769,373	\$7,287 / Unit	\$2,419,373	\$2,419,373	\$7,287 / Unit		\$1,769,373	\$25,000	0.0%	\$0	
Financing	25,000	\$2,679,309	\$11,621 / Unit	\$3,858,032	\$3,858,032	\$11,621 / Unit		\$2,679,309	\$25,000	0.0%	\$0	
Developer Fee	\$5,230,470	\$3,599,221	15.03%	15.04%	\$8,829,691	\$8,804,679	15.00%	15.00%	\$3,599,221	\$5,212,958	0.3%	\$25,012
Reserves			4 Months	\$1,380,406	\$1,380,406	4 Months				0.0%	\$0	
TOTAL HOUSING DEVELOPMENT COST (UNADJUSTED BASIS)	\$39,983,522	\$27,594,026	\$220,442 / Unit	\$73,186,677	\$73,161,665	\$220,366 / Unit		\$27,594,026	\$39,966,010	0.0%	\$25,012	
Acquisition Cost	\$0			\$0								
Contingency		\$0		\$0								
Contractor's Fee		\$0		\$0								
Financing Cost		\$0										
Developer Fee	(\$2,703)	\$7,152		(\$25,012)								
Reserves				\$0								
ADJUSTED BASIS / COST	\$39,980,819	\$27,594,026	\$220,366/unit	\$73,161,665	\$73,161,665	\$220,366/unit		\$27,594,026	\$39,966,010	0.0%	\$0	
TOTAL HOUSING DEVELOPMENT COSTS BASED ON 3RD PARTY PCA/CNA				\$73,161,665								

CAPITALIZATION / DEVELOPMENT COST BUDGET / ITEMIZED BASIS ITEMS

333 Holly, The Woodlands, TDHCA Bonds/4% HTC #20611

CREDIT CALCULATION ON QUALIFIED BASIS				
	Applicant		TDHCA	
	Acquisition	Construction Rehabilitation	Acquisition	Construction Rehabilitation
ADJUSTED BASIS	\$39,980,819	\$27,594,026	\$39,966,010	\$27,594,026
Deduction of Federal Grants	\$0	\$0	\$0	\$0
TOTAL ELIGIBLE BASIS	\$39,980,819	\$27,594,026	\$39,966,010	\$27,594,026
High Cost Area Adjustment		130%		130%
TOTAL ADJUSTED BASIS	\$39,980,819	\$35,872,234	\$39,966,010	\$35,872,234
Applicable Fraction	100.00%	100.00%	100.00%	100.00%
TOTAL QUALIFIED BASIS	\$39,980,819	\$35,872,234	\$39,966,010	\$35,872,234
Applicable Percentage	3.34%	3.34%	3.34%	3.34%
ANNUAL CREDIT ON BASIS	\$1,335,359	\$1,198,133	\$1,334,865	\$1,198,133
CREDITS ON QUALIFIED BASIS	\$2,533,492		\$2,532,997	

Method	ANNUAL CREDIT CALCULATION BASED ON TDHCA BASIS		FINAL ANNUAL LIHTC ALLOCATION		
	Annual Credits	Proceeds	Credit Price \$0.9899	Variance to Request	
			Credit Allocation	Credits	Proceeds
Eligible Basis	\$2,532,997	\$25,074,164	----	----	----
Needed to Fill Gap	\$2,844,897	\$28,161,665	----	----	----
Applicant Request	\$2,484,301	\$24,592,119	\$2,484,301	\$0	\$0

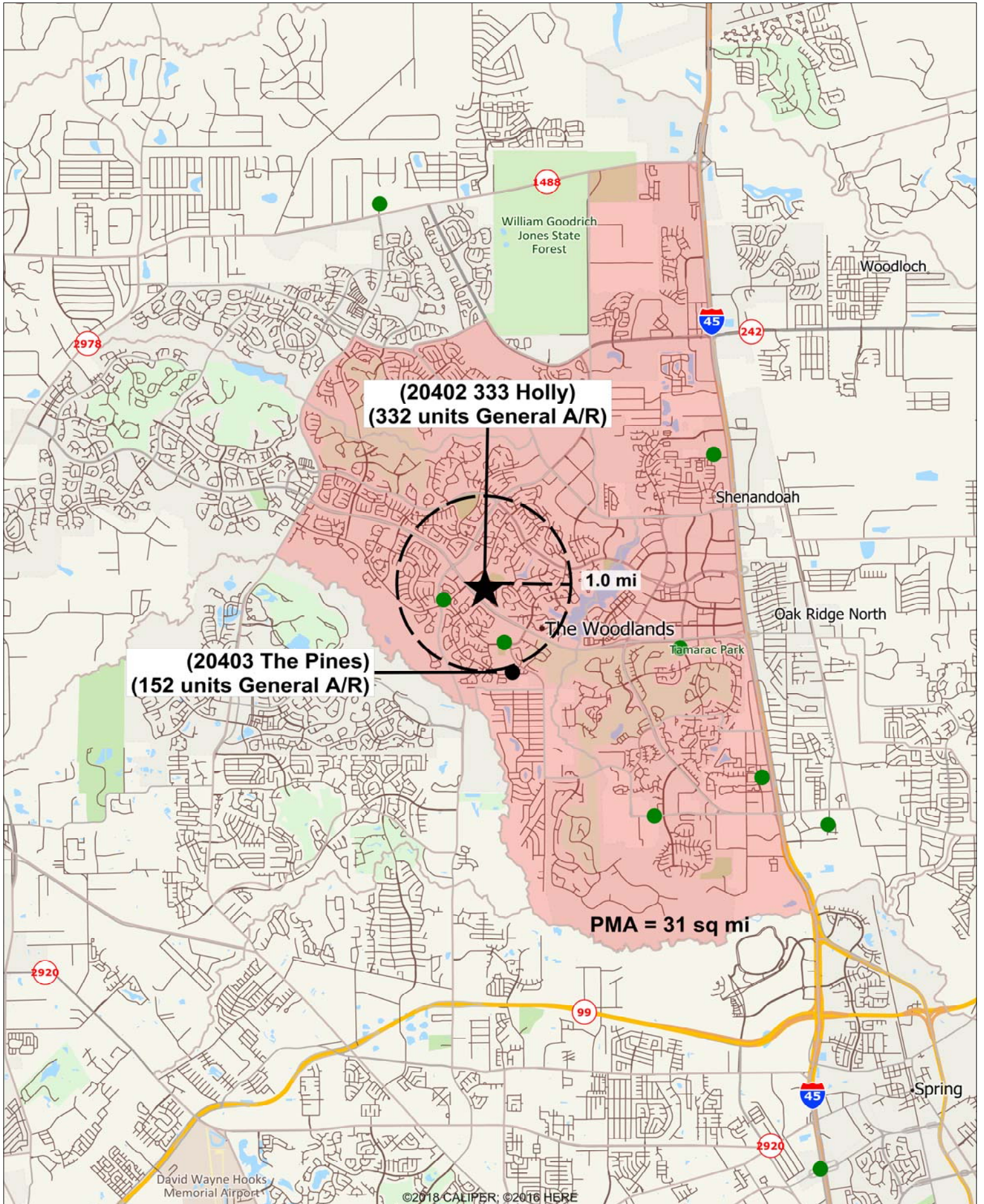
50% Test for Bond Financing for 4% Tax Credits					
Tax-Exempt Bond Amount	\$36,800,000		Percent Financed by Tax-Exempt Bonds	Applicant	TDHCA
Aggregate Basis Limit for 50% Test	\$73,600,000				
	Applicant	TDHCA			
Land Cost	\$2,450,000	\$1,592,042			
Depreciable Bldg Cost	\$59,372,857	\$60,230,815			
Aggregate Basis for 50% Test	\$61,822,857	\$61,822,857	amount aggregate basis can increase before 50% test fails	\$11,777,143 19.0%	\$11,777,143 19.0%

Long-Term Pro Forma

333 Holly, The Woodlands, TDHCA Bonds/4% HTC #20611

	Growth Rate	Year 1	Year 2	Year 3	Year 4	Year 5	Year 10	Year 15	Year 20	Year 25	Year 30	Year 35
EFFECTIVE GROSS INCOME	2.00%	\$4,575,123	\$4,666,625	\$4,759,958	\$4,855,157	\$4,952,260	\$5,467,695	\$6,036,777	\$6,665,090	\$7,358,798	\$8,124,708	\$8,970,334
TOTAL EXPENSES	3.00%	\$1,767,933	\$1,819,178	\$1,871,925	\$1,926,217	\$1,982,101	\$2,287,088	\$2,639,536	\$3,046,890	\$3,517,765	\$4,062,138	\$4,691,560
NET OPERATING INCOME ("NOI")		\$2,807,190	\$2,847,447	\$2,888,033	\$2,928,940	\$2,970,159	\$3,180,607	\$3,397,241	\$3,618,200	\$3,841,033	\$4,062,569	\$4,278,774
EXPENSE/INCOME RATIO		38.6%	39.0%	39.3%	39.7%	40.0%	41.8%	43.7%	45.7%	47.8%	50.0%	52.3%
MUST -PAY DEBT SERVICE												
TOTAL DEBT SERVICE		\$2,237,461	\$2,237,461	\$2,237,461	\$2,237,461	\$2,237,461	\$2,237,461	\$2,237,461	\$2,237,461	\$2,237,461	\$2,237,461	\$2,237,461
DEBT COVERAGE RATIO		1.25	1.27	1.29	1.31	1.33	1.42	1.52	1.62	1.72	1.82	1.91
ANNUAL CASH FLOW		\$569,729	\$609,987	\$650,572	\$691,479	\$732,698	\$943,147	\$1,159,780	\$1,380,740	\$1,603,572	\$1,825,109	\$2,041,314
Deferred Developer Fee Balance		\$2,999,816	\$2,389,830	\$1,739,258	\$1,047,779	\$315,080	\$0	\$0	\$0	\$0	\$0	\$0
CUMULATIVE NET CASH FLOW		\$0	\$0	\$0	\$0	\$0	\$3,976,975	\$9,340,468	\$15,800,961	\$23,372,984	\$32,056,711	\$41,833,933

20611 - 333 Holly PMA Map



TEXAS DEPT OF HOUSING & COMMUNITY AFFAIRS

Moderator: Teresa Morales

April 30, 2020

6:01 pm CT

Teresa Morales: Good evening. This is Teresa Morales with the Texas Department of Housing and Community Affairs and the purpose of this call is to conduct a public hearing with respect to the proposed affordable housing development known as 333 Holly Apartments.

We'll allow folks an opportunity to still call in. We'll get started in about another minute or so.

Good evening. This is Teresa Morales with the Texas Department of Housing and Community Affairs and we are going to go ahead and get started with the public hearing for the proposed 333 Holly Apartments.

For the purposes of this hearing, there will be a brief speech that I need to read that is required by the Internal Revenue Code and it will be at the conclusion of that speech when I will open up the lines for any public comment that individuals wish to make.

Good evening. My name is Teresa Morales and I would like to proceed with the public hearing. Let the record show that it is 6:08 pm on Tuesday - excuse me - on Thursday, April 30, 2020 and we are conducting a public hearing on behalf of the Texas Department of Housing and Community Affairs with respect to an issue of tax-exempt multifamily revenue bonds for a residential

rental community.

This hearing is required by the Internal Revenue Code. The purpose of this hearing is to provide a reasonable opportunity for interested individuals to express their views regarding the development and the proposed bond issue.

(Unintelligible) will be made at this hearing. The department's board is scheduled to meet to consider the transaction on May 21st, 2020. In addition to providing your comments at this hearing, the public is also invited to provide comment directly to the board at any of their meetings.

The bonds will be issued as tax-exempt multifamily revenue bonds in the aggregate principal amount and not to exceed \$50 million and taxable bonds, if necessary, in an amount to be determined and issued in one or more series by the Texas Department of Housing and Community Affairs, the issuer.

The proceeds of the bonds will be loaned to 333 Holly Preservation, LP or a related person or affiliate entity thereof to finance a portion of the cross of acquiring, rehabbing and equipping a multifamily housing community described as follows.

A 332-unit multifamily residential rental development to be located on approximately 17.13 acres of land located at 333 Holly Court, The Woodlands, Montgomery County, Texas 77381. The proposed multifamily rental housing community will be initially owned and operated by the borrower or related person or affiliate thereof.

I would now like to open the floor up for public comment for those individuals who would like to express any comments with respect to this proposed development and we'll open the lines for you to be able to do that.

Operator: All participants are now in interactive talk mode.

Teresa Morales: The lines are now open and unmuted. If there are any individuals who would

like to express public comment with respect to 333 Holly Apartments, you can go ahead and proceed.

Hearing none, let the record show that the meeting is adjourned and the time is now 6:11 pm.

END

5c

BOARD ACTION REQUEST
BOND FINANCE DIVISION
MAY 21, 2020

Presentation, discussion, and possible action regarding the Issuance of Multifamily Green Tax-Exempt Bonds (Green M-TEBS – The Pines) Resolution No. 20-021 and a Determination Notice of Housing Tax Credits

RECOMMENDED ACTION

WHEREAS, the Board adopted an inducement resolution for The Pines at the Board meeting of October 10, 2019;

WHEREAS, a 4% Housing Tax Credit application for The Pines, sponsored by Rainbow – Pines, LLC, which includes Rainbow Housing Texas, Inc. as sole member of the general partner was submitted to the Department on April 10, 2020;

WHEREAS, a Certification of Reservation (Reservation) was issued in the amount of \$22,000,000 on May 8, 2020, with a bond delivery deadline of November 4, 2020; and

WHEREAS, the Executive Award Review Advisory Committee (EARAC) considered and approved the program and underwriting aspects of the application;

WHEREAS, in accordance with 10 TAC §1.301(d)(1), the compliance history is designated as a Category 3 and is on this Board agenda for consideration by the Board under Item 4;

WHEREAS, only if the compliance history is approved by the Board may the Board take action under this agenda item relating to the issuance of Multifamily Green Tax-Exempt Bonds and the issuance of a Determination Notice, based on the facts and circumstances unique to this transaction and discussed herein that necessitate consideration on the same agenda as a recommendation of denial from compliance;

WHEREAS, Board approval of the compliance history despite the Category 3 designation would prompt the Board to impose conditions on the applicant of this award should they so choose; and

NOW, therefore, it is hereby

RESOLVED, that the issuance of Multifamily Green Tax-Exempt Bonds (Green M-TEBS - The Pines) in an amount not to exceed \$22,000,000, Resolution No. 20-021 is hereby approved in the form presented to this meeting;

FURTHER RESOLVED, the issuance of a Determination Notice of \$1,469,273 in 4% Housing Tax Credits for The Pines, subject to underwriting conditions that may be applicable as found in the Real Estate Analysis report posted to the Department’s website, is hereby approved in the form presented to this meeting;

FURTHER RESOLVED, any conditions imposed by the Board relating to the compliance history of the applicant are hereby a condition of the award; and

FURTHER RESOLVED, that if approved, staff is authorized, empowered, and directed, for and on behalf of the Department to execute such documents, instruments and writings and perform such acts and deeds as may be necessary to effectuate the foregoing.

BACKGROUND

General Information: The Bonds will be issued in accordance with Tex. Gov’t Code §2306.353 *et seq.*, which authorizes the Department to issue revenue bonds for its public purposes, as defined therein. Tex. Gov’t Code §2306.472 provides that the Department’s revenue bonds are solely obligations of the Department, and do not create an obligation, debt or liability of the State of Texas or a pledge or loan of faith, credit or taxing power of the State of Texas.

Development Information: The Pines is located at 3451 Tangle Brush Drive in The Woodlands, Montgomery County, and proposes the acquisition and rehabilitation of 152 units that will continue to serve the general population. The Reservation from the Bond Review Board was issued under the Priority 3 designation, which does not have a prescribed restriction on the percentage of Area Median Family Income (AMFI) that must be served. All 152 units will be rent and income restricted at 60% of AMFI. There is an existing Section 8 HAP contract covering all of the units that is expected to continue. Rehabilitation costs (includes building costs and site work) are approximately \$47k per unit.

This application was originally submitted in December 2019, with Private Activity Bonds proposed to be issued through Montgomery County Housing Finance Corporation (HFC). The organizational structure associated with that application involved Texas Housing Foundation (THF) as the sole member of the general partner. In April 2020, the applicant moved the transaction to TDHCA as the issuer, which resulted in some changes to the full application that had already undergone a program review by staff. One change was to the organizational structure, which replaced THF with Rainbow Housing Texas, Inc (Rainbow) as the sole member of the general partner. For efficiency and in line with common practice with respect to these types of changes, submission of a new application was not required; rather, the applicant was instructed to submit revised application exhibits affected by the change to allow an additional review of these items to be performed by staff and inserted into the application.

Once the previous participation review was completed and it was determined that there was an event of foreclosure associated with Rainbow, staff realized that the *Development Owner Certification, Acknowledgement and Consent* form in the application failed to disclose such event pursuant to §11.202(1)(M) which states, in part, that “*an Applicant may be considered ineligible if...the Applicant, Developer, or Guarantor...*”

(M) Fails to disclose, in the Application, any Principal or any entity or Person in the Development ownership structure who was or is involved as a Principal in any other affordable housing transaction, that has terminated voluntarily or involuntarily within the past 10 years, or plans to or is negotiating to terminate, their relationship with any other affordable housing development. The disclosure must identify the person or persons and development involved, the identity of each other development, and contact information for the other Principals of each such development, a narrative description of the facts and circumstances of the termination or proposed termination, and any appropriate supporting documents. An Application may be referred to the Board for a determination of a person's fitness to be involved as a Principal with respect to an Application, which may include a staff recommendation..."

Based on Board action under Item 4 on today's agenda approving the compliance history of this application, staff believes the aforementioned failure to disclose has been addressed and no additional action by the Board or applicant under §11.202 is required under the current agenda item.

Organizational Structure and Previous Participation: The Borrower is The Pines Preservation, LP and includes the entities and principals as illustrated in Exhibit A. The applicant's portfolio is considered a Category 3 and, if this item is being considered, then the previous participation was deemed acceptable by the Board under agenda Item 4 on today's agenda. Any conditions imposed by the Board as a result of their approval of the compliance history will be factored into this award.

Staff notes that applications for which there is a Category 3 designation under the previous participation rules are decided from an eligibility standpoint on the Board agenda, followed by a decision on the award on a subsequent Board agenda, assuming the compliance history was approved. The Pines transaction warrants consideration on the same agenda as the compliance eligibility (only to the extent the compliance history is approved) based on circumstances unique to the transaction.

The Pines was originally placed under contract in July 2019. The Board adopted an inducement resolution in October 2019. Concurrent with the Board's inducement, the applicant tracked the development through Montgomery County HFC with the goal of obtaining a bond reservation sooner, as well as track the various local approvals necessary for the application. Despite being in-line for a bond reservation with Montgomery County HFC last fall, there was no volume cap left in 2019 to secure a reservation. A reservation was obtained at the start of the 2020 program year in January, and the full HTC application was submitted and reviewed by staff shortly thereafter. As the application was in underwriting the applicant made the decision to switch issuers to TDHCA. With limited volume cap remaining in its set-aside, staff started conversations with the Attorney General's office to transfer the volume cap associated with The Pines from Montgomery County HFC to TDHCA; however, in the midst of COVID-19, those conversations did not result in any determination as to what local approvals would be required.

The applicant revised the financing structure to accommodate the limited volume cap the Department had as well as modify the organizational structure to include a different non-profit entity for purposes of seeking a 50% property tax exemption (in lieu of the 100% exemption the prior nonprofit general

partner could provide). The Department expeditiously processed these changes, held a TEFRA hearing and worked with bond counsel and the working group to get substantially final bond documents before the Board today, something that was accomplished in only two weeks' time which demonstrates the commitment by the financing partners to this transaction and their desire to close.

Given that the Department is the issuer, the transaction will require Bond Review Board approval, which lengthens the timeline by which to close, something that is not required for local issuer transactions. Moreover, while the purchase contract provides for an extension, it is only if the delay is attributable to the renewal and transfer of the existing HAP contract by HUD. The seller is under no obligation to extend the closing date if the delay is attributable to TDHCA. To delay consideration of the award until the June Board meeting would impact the closing timeline that could unduly jeopardize the transaction, based not only on the aforementioned factors, but based on market conditions and potential disruptions in response to COVID-19, and the desire of all financing participants to close the transaction as quickly as possible.

Tax Equity and Fiscal Responsibility Act (TEFRA) Public Hearing/Public Comment: In light of COVID-19 and the inability for an in-person TEFRA hearing to be held, staff proceeded (under guidance from Bracewell, bond counsel to the Department), to conduct a telephonic hearing for the proposed development which was held on April 30, 2020. Given that it was via telephone and would ordinarily be difficult to discern exactly how many individuals participated in the hearing, there is an option on the call line to obtain a participant count. For this hearing there were only two attendees, which represented staff conducting the hearing. A copy of the hearing transcript is included herein. The Department has received no letters of support or opposition for this development. Staff notes that the IRS subsequently published guidance that conducting a TEFRA via telephone is acceptable in light of COVID-19.

Summary of Financial Structure

This transaction utilizes a Fannie Mae Multifamily Pass-Through Mortgage-Backed Security (MBS). The mortgage loan will be originated by the Department to the Borrower on the closing date and funded with bond proceeds. Simultaneously with the closing, the loan will be assigned to the Fannie Mae lender (Wells Fargo Multifamily Capital) and the funds used by the lender by which to acquire the loan will be deposited into the collateral account to secure the bonds. The project will be 100% cash collateralized at all times, which offers protection for the bondholders. Approximately 10-15 days from the closing date Wells Fargo Multifamily Capital will assign the loan to Fannie Mae and in exchange, Fannie will deliver the MBS to the trustee. The trustee will use the funds (loan proceeds from Wells Fargo) in the collateral account to purchase the MBS which will be used to secure the bonds from that point forward. Payments on the bonds will be guaranteed by Fannie Mae.

Under the proposed structure, the Department will issue tax-exempt fixed rate bonds in an amount not to exceed \$22,000,000 that will be initially placed with Wells Fargo Multifamily Capital. The bonds will have an interest rate that mirrors the pass-through rate on the MBS, currently estimated to be 2.50%, which does not include servicing (0.420%) or guarantee fees (0.780%). The all-in rate will be 3.70%. The

loan will have a term of 17 years and a 35-year amortization. The bonds will have a maximum maturity date of June 1, 2040, but are expected to reach maturity on July 1, 2037.

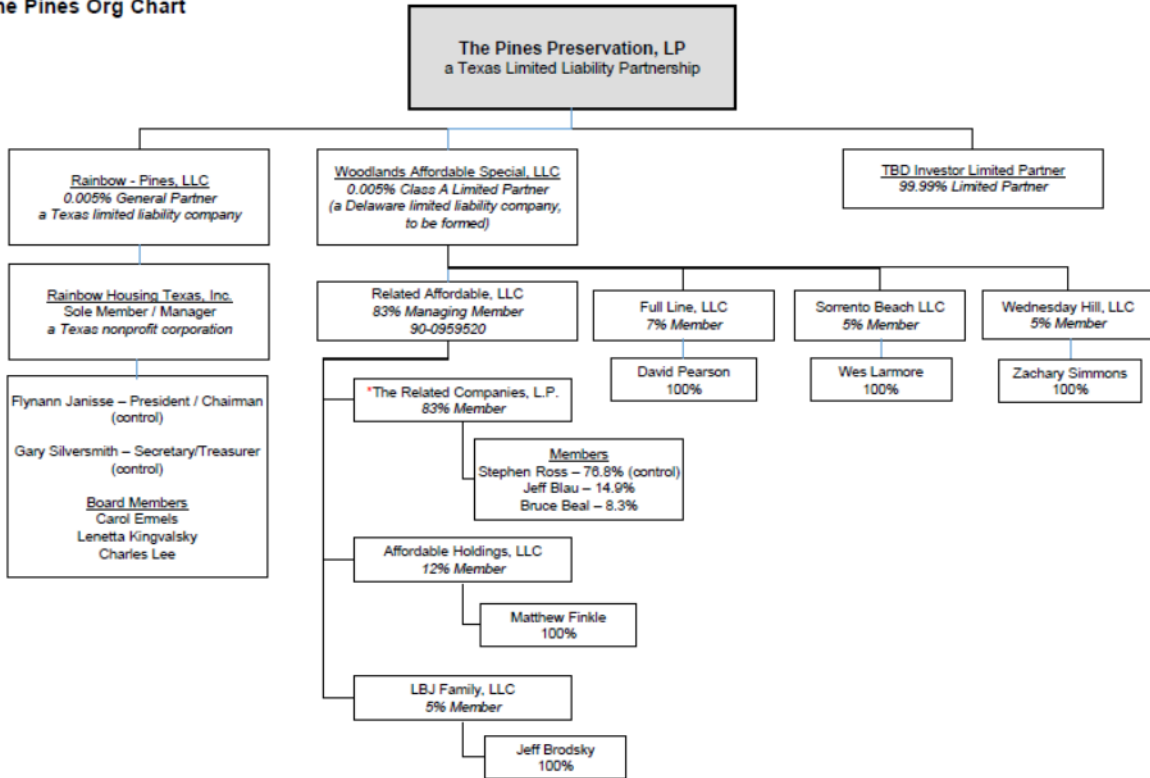
In addition to the \$22,000,000 in tax-exempt proceeds, the transaction also involves \$4,500,000 in taxable, conventional debt. Although the transaction was originally contemplated to have all project costs funded with tax-exempt bonds, limitations on available volume cap required use of taxable conventional debt. The tax-exempt bonds being issued are sufficient to meet the 50% test related to bond proceeds that are required to finance at least 50% of the development's aggregate basis in order to qualify for the 4% HTC.

Additionally, unique to this transaction is that it's utilizing a product from Fannie under their Green Building Program. The name of the issuance reflects that they are Multifamily Green Tax-Exempt Bonds. Fannie Mae offers incentives (preferential pricing and a free energy and water audit paid by Fannie) for owners who commit to property improvements that are projected to reduce the property's annual energy and/or water consumption by at least 30%. As a result of these features it will disclose the Green Loan as a Green MBS and will presumably be able to access a broader MBS investor market.

A copy of the Exhibits recommended to be approved by the Board as referenced in Resolution No. 20-021 can be found online at TDHCA's Board Meeting Information Center website at <http://www.tdhca.state.tx.us/board/meetings.htm>.

Exhibit A

The Pines Org Chart



*The Related Companies, L.P. is the Guarantor.

RESOLUTION NO. 20-021

RESOLUTION AUTHORIZING AND APPROVING THE ISSUANCE, SALE AND DELIVERY OF TEXAS DEPARTMENT OF HOUSING AND COMMUNITY AFFAIRS MULTIFAMILY GREEN TAX-EXEMPT BONDS (GREEN M-TEBS – THE PINES) SERIES 2020; APPROVING THE FORM AND SUBSTANCE AND AUTHORIZING THE EXECUTION AND DELIVERY OF DOCUMENTS AND INSTRUMENTS PERTAINING THERETO; AUTHORIZING AND RATIFYING OTHER ACTIONS AND DOCUMENTS; AND CONTAINING OTHER PROVISIONS RELATING TO THE SUBJECT

WHEREAS, the Texas Department of Housing and Community Affairs (the “Department”) has been duly created and organized pursuant to and in accordance with the provisions of Chapter 2306, Texas Government Code, as amended (the “Act”), for the purpose, among others, of providing a means of financing the costs of residential ownership, development, construction and rehabilitation that will provide decent, safe, and affordable living environments for individuals and families of low, very low and extremely low income (as defined in the Act) and families of moderate income (as described in the Act and determined by the Governing Board of the Department (the “Board”) from time to time); and

WHEREAS, the Act authorizes the Department: (a) to make mortgage loans to housing sponsors to provide financing for multifamily residential rental housing in the State of Texas (the “State”) intended to be occupied by individuals and families of low, very low and extremely low income and families of moderate income, as determined by the Department; (b) to issue its revenue bonds, for the purpose, among others, of obtaining funds to make such loans and provide financing, to establish necessary reserve funds and to pay administrative and other costs incurred in connection with the issuance of such bonds; and (c) to pledge all or any part of the revenues, receipts or resources of the Department, including the revenues and receipts to be received by the Department from such multifamily residential rental development loans, and to mortgage, pledge or grant security interests in such loans or other property of the Department in order to secure the payment of the principal or redemption price of and interest on such bonds; and

WHEREAS, the Board has determined to authorize the issuance of its Texas Department of Housing and Community Affairs Multifamily Green Tax-Exempt Bonds (GREEN M-TEBS – THE PINES) Series 2020 (the “Bonds”) pursuant to and in accordance with the terms of an Indenture of Trust (the “Indenture”) between the Department and BOKF, NA, as trustee (the “Trustee”), for the purpose of obtaining funds to finance the Development (defined below), all under and in accordance with the Constitution and laws of the State; and

WHEREAS, the Department desires to use the proceeds of the Bonds to fund a mortgage loan to The Pines Preservation, LP, a Texas limited partnership (the “Borrower”) in order to finance the cost of acquisition, equipping and rehabilitation of a qualified residential rental development described in Exhibit A attached hereto (the “Development”) located within the

State and required by the Act to be occupied by individuals and families of low and very low income and families of moderate income, as determined by the Department; and

WHEREAS, the Board, by a resolution adopted on October 10, 2019, declared its intent to issue its revenue bonds to provide financing for the Development; and

WHEREAS, the Borrower has requested and received a reservation of private activity bond allocation from the State of Texas; and

WHEREAS, it is anticipated that the Department, the Trustee, the Lender (defined below) and the Borrower will execute and deliver a Financing Agreement (the "Financing Agreement") pursuant to which (i) the Department will agree to make a mortgage loan (the "Loan") to the Borrower to enable the Borrower to finance the cost of acquisition, equipping and rehabilitation of the Development and related costs, and (ii) the Borrower will execute and deliver to the Department a promissory note (the "Note") in an original principal amount equal to the original aggregate principal amount of the Bonds, and providing for payment of interest on such principal amount sufficient to pay the interest on the Bonds in accordance with the terms of a Multifamily Loan and Security Agreement (Non-Recourse) (the "Loan Agreement") by and between the Borrower and the Department and to pay other costs described in the Financing Agreement; and

WHEREAS, it is anticipated that the Note will be secured by a Multifamily Deed of Trust, Assignment of Leases and Rents, Security Agreement and Fixture Filing (the "Mortgage") from the Borrower for the benefit of the Department; and

WHEREAS, it is anticipated that the obligations of the Borrower under the Financing Agreement (other than for the repayment of principal and interest) will be secured by a Subordinate Multifamily Deed of Trust, Security Agreement and Fixture Filing (the "Subordinate Mortgage") from the Borrower for the benefit of the Department and the Trustee; and

WHEREAS, the Borrower will obtain a loan from, Wells Fargo Bank, National Association, as lender (the "Lender"), and the Lender will deposit the proceeds of such loan with the Trustee, to be held by the Trustee as security for the Bonds in accordance with the Indenture; and

WHEREAS, in connection with the financing of the Development, the Borrower will also obtain a taxable mortgage loan (the "Taxable Mortgage Loan") from the Lender; and

WHEREAS, the Board has determined that the Department, the Trustee, and the Borrower will execute a Tax Exemption Certificate and Agreement (the "Tax Exemption Agreement") to set forth various facts, certifications, covenants, representations, and warranties regarding the Bonds and the Development and to establish the expectations of the Department, the Trustee, and the Borrower as to future events regarding the Bonds, the Development, and the use and investment of proceeds of the Bonds; and

WHEREAS, the Board has determined that the Department, the Trustee and the Borrower will execute a Regulatory and Land Use Restriction Agreement (the "Regulatory Agreement") with respect to the Development, which will be filed of record in the real property records of Montgomery County, Texas; and

WHEREAS, the Lender has agreed to permit the Loan and the Taxable Mortgage Loan, and to allow the lien of the Subordinate Mortgage in accordance with the terms of a Subordination Agreement (Affordable) (the "Subordination Agreement") among the Lender, the Department and the Borrower; and

WHEREAS, the Board has been presented with a draft of, has considered and desires to ratify, approve, confirm and authorize the use and distribution in the public offering of the Bonds of an Official Statement (the "Official Statement") and to authorize the Authorized Representatives (as defined herein) of the Department to deem the Official Statement "final" for purposes of Rule 15c2-12 of the Securities and Exchange Commission and to approve the making of such changes in the Official Statement as may be required to provide a final Official Statement for use in the public offering and sale of the Bonds; and

WHEREAS, the Board has further determined that the Department will enter into a Purchase Contract (the "Bond Purchase Agreement") with Jefferies LLC (the "Underwriter"), and the Borrower, setting forth certain terms and conditions upon which the Underwriter will purchase all of the Bonds from the Department and the Department will sell the Bonds to the Underwriter; and

WHEREAS, the Board has examined proposed forms of (a) the Indenture, the Financing Agreement, the Tax Exemption Agreement, the Regulatory Agreement, the Loan Agreement, the Subordination Agreement, the Official Statement and the Bond Purchase Agreement (collectively, the "Issuer Documents"), all of which are attached to and comprise a part of this Resolution and (b) the Mortgage, the Subordinate Mortgage and the Note; has found the form and substance of such documents to be satisfactory and proper and the recitals contained therein to be true, correct and complete; and has determined, subject to the conditions set forth in Article 1, to authorize the issuance of the Bonds, the execution and delivery of the Issuer Documents, the acceptance of the Mortgage, the Subordinate Mortgage and the Note and the taking of such other actions as may be necessary or convenient in connection therewith;

NOW, THEREFORE, BE IT RESOLVED BY THE GOVERNING BOARD OF THE TEXAS DEPARTMENT OF HOUSING AND COMMUNITY AFFAIRS:

ARTICLE 1

ISSUANCE OF BONDS; APPROVAL OF DOCUMENTS

Section 1.1 Issuance, Execution and Delivery of the Bonds. That the issuance of the Bonds is hereby authorized pursuant to the Act, including particularly Section 2306.353 thereof,

and Chapter 1371, Texas Government Code, all under and in accordance with the conditions set forth herein and in the Indenture, and that, upon execution and delivery of the Indenture, the Authorized Representatives of the Department named in this Resolution are each hereby authorized to execute, attest and affix the Department's seal to the Bonds and to deliver the Bonds to the Attorney General of the State (the "Attorney General") for approval, the Comptroller of Public Accounts of the State for registration and the Trustee for authentication (to the extent required in the Indenture), and thereafter to deliver the Bonds to or upon the order of the initial purchaser thereof pursuant to the Bond Purchase Agreement.

Section 1.2 Interest Rate, Principal Amount, Maturity and Price. That the Chair or Vice Chair of the Board or the Executive Director of the Department are hereby authorized and empowered, in accordance with Chapter 1371, Texas Government Code, to fix and determine the interest rate, principal amount and maturity of, the redemption and tender provisions related to, and the price at which the Department will sell to the Underwriter or another party to the Bond Purchase Agreement, the Bonds, all of which determinations shall be conclusively evidenced by the execution and delivery by an Authorized Representative (as defined below) of the Department of the Indenture and the Bond Purchase Agreement; provided, however, that (i) the Bonds shall bear interest at the interest rate set forth in the Bond Purchase Agreement in accordance with the provisions of the Indenture; provided that in no event shall the interest rate on the Bonds (including any default interest rate) exceed the maximum interest rate permitted by applicable law; and provided further that the initial interest rate on the Bonds shall not exceed 6.00% (ii) the aggregate principal amount of the Bonds shall not exceed \$22,000,000; (iii) the final maturity of the Bonds shall occur not later than June 1, 2040; and (iv) the price at which the Bonds are sold to the initial purchaser thereof under the Bond Purchase Agreement shall not exceed 100% of the principal amount thereof.

Section 1.3 Approval, Execution and Delivery of the Indenture. That the form and substance of the Indenture are hereby approved, and that the Authorized Representatives (as defined below) are each hereby authorized to execute the Indenture, and to deliver the Indenture to the Trustee.

Section 1.4 Approval, Execution and Delivery of the Financing Agreement and the Loan Agreement. That the form and substance of the Financing Agreement and the Loan Agreement are hereby approved, and that the Authorized Representatives are each hereby authorized to execute the Financing Agreement and the Loan Agreement, and to deliver the Financing Agreement and the Loan Agreement to the Borrower.

Section 1.5 Approval, Execution and Delivery of the Tax Exemption Agreement. That the form and substance of the Tax Exemption Agreement relating to the Bonds are hereby approved and the Authorized Representatives are each hereby authorized to execute the Tax Exemption Agreement and to deliver the Tax Exemption Agreement to the Borrower and the Trustee.

Section 1.6 Approval, Execution and Delivery of the Regulatory Agreement. That the form and substance of the Regulatory Agreement are hereby approved, and that the

Authorized Representatives are each hereby authorized to execute, attest and affix the Department's seal to the Regulatory Agreement, and to deliver the Regulatory Agreement to the Borrower and the Trustee and to cause the Regulatory Agreement to be filed of record in the real property records of Montgomery County, Texas.

Section 1.7 Approval, Execution and Delivery of the Bond Purchase Agreement. That the sale of the Bonds to the Underwriter and/or any other parties pursuant to the Bond Purchase Agreement is hereby approved, that the form and substance of the Bond Purchase Agreement are hereby approved, and that the Authorized Representatives are each hereby authorized to execute the Bond Purchase Agreement and to deliver the Bond Purchase Agreement to the Borrower, the Underwriter, and/or any other parties to the Bond Purchase Agreement, as appropriate.

Section 1.8 Acceptance of the Note, the Mortgage and the Subordinate Mortgage. That the form and substance of the Note, the Mortgage and the Subordinate Mortgage are hereby accepted by the Department and that the Authorized Representatives are each hereby authorized to endorse and deliver the Note without recourse.

Section 1.9 Approval, Execution and Delivery of the Subordination Agreement. That the form and substance of the Subordination Agreement are hereby approved, and that the Authorized Representatives are each hereby authorized to execute the Subordination Agreement, and to deliver the Subordination Agreement to the Lender and the Borrower and to cause the Subordination Agreement to be filed of record in the real property records of Montgomery County, Texas.

Section 1.10 Approval, Execution, Use and Distribution of the Official Statement. That the form and substance of the Official Statement and its use and distribution by the Underwriter in accordance with the terms, conditions and limitations contained therein are hereby approved, ratified, confirmed and authorized; that the Chair and Vice Chair of the Board and the Executive Director of the Department are hereby severally authorized to deem the Official Statement "final" for purposes of Rule 15c2-12 under the Securities and Exchange Act of 1934; that the Authorized Representatives named in this Resolution are each authorized hereby to make or approve such changes in the Official Statement as may be required to provide a final Official Statement for the Bonds; that the Authorized Representatives named in this Resolution are each authorized hereby to accept the Official Statement, as required; and that the use and distribution of the Official Statement by the Underwriter hereby is authorized and approved, subject to the terms, conditions and limitations contained therein, and further subject to such amendments or additions thereto as may be required by the Bond Purchase Agreement and as may be approved by the Executive Director of the Department and the Department's counsel.

Section 1.11 Taking of Any Action; Execution and Delivery of Other Documents. That the Authorized Representatives are each hereby authorized to take any actions and to execute, attest and affix the Department's seal to, and to deliver to the appropriate parties, all such other agreements, commitments, assignments, bonds, certificates, contracts, documents, instruments, releases, financing statements, letters of instruction, notices of acceptance,

written requests and other papers, whether or not mentioned herein, as they or any of them consider to be necessary or convenient to carry out or assist in carrying out the purposes of this Resolution.

Section 1.12 Power to Revise Form of Documents. That, notwithstanding any other provision of this Resolution, the Authorized Representatives are each hereby authorized to make or approve such revisions in the form of the documents attached hereto as exhibits as, in the judgment of such Authorized Representative, and in the opinion of Bracewell LLP, Bond Counsel to the Department (“Bond Counsel”), may be necessary or convenient to carry out or assist in carrying out the purposes of this Resolution, such approval to be evidenced by the execution of such documents by the Authorized Representatives.

Section 1.13 Exhibits Incorporated Herein. That all of the terms and provisions of each of the documents listed below as an exhibit shall be and are hereby incorporated into and made a part of this Resolution for all purposes:

- Exhibit B - Indenture
- Exhibit C - Financing Agreement
- Exhibit D - Loan Agreement
- Exhibit E - Tax Exemption Agreement
- Exhibit F - Regulatory Agreement
- Exhibit G - Bond Purchase Agreement
- Exhibit H - Note
- Exhibit I - Mortgage
- Exhibit J - Subordinate Mortgage
- Exhibit K - Subordination Agreement
- Exhibit L - Official Statement

Section 1.14 Authorized Representatives. That the following persons are each hereby named as authorized representatives of the Department for purposes of executing, attesting, affixing the Department’s seal to, and delivering the documents and instruments and taking the other actions referred to in this Article 1: the Chair or Vice Chair of the Board, the Executive Director of the Department, the Director of Administration of the Department, the Director of Financial Administration of the Department, the Director of Bond Finance and Chief Investment Officer of the Department, the Director of Multifamily Bonds of the Department, the Director of Texas Homeownership of the Department and the Secretary or any Assistant Secretary to the Board. Such persons are referred to herein collectively as the “Authorized Representatives.” Any one of the Authorized Representatives is authorized to act individually as set forth in this Resolution.

ARTICLE 2

APPROVAL AND RATIFICATION OF CERTAIN ACTIONS

Section 2.1 Approval and Ratification of Application to Texas Bond Review Board. That the Board hereby ratifies and approves the submission of the application for approval of state bonds to the Texas Bond Review Board on behalf of the Department in connection with the issuance of the Bonds in accordance with Chapter 1231, Texas Government Code.

Section 2.2 Approval of Submission to the Attorney General. That the Board hereby authorizes, and approves the submission by Bond Counsel to the Attorney General, for his approval, of a transcript of legal proceedings relating to the issuance, sale and delivery of the Bonds.

Section 2.3 Certification of the Minutes and Records. That the Secretary or Assistant Secretary to the Board hereby is authorized to certify and authenticate minutes and other records on behalf of the Department for the Bonds and all other Department activities.

Section 2.4 Approval of Requests for Rating from Rating Agency. That the action of the Executive Director of the Department or any successor and the Department's consultants in seeking a rating from Moody's Investors Services, Inc., and its successors and assigns, is approved, ratified and confirmed hereby.

Section 2.5 Authority to Invest Proceeds. That the Department is authorized to invest and reinvest the proceeds of the Bonds and the fees and revenues to be received in connection with the financing of the Development in accordance with the Indenture and the Tax Exemption Agreement and to enter into any agreements relating thereto only to the extent permitted by the Indenture and the Tax Exemption Agreement.

Section 2.6 Underwriter. That the underwriter with respect to the issuance of the Bonds will be Jefferies LLC, or any other party identified in the Bond Purchase Agreement.

Section 2.7 Engagement of Other Professionals. That the Executive Director of the Department or any successor is authorized to engage auditors to perform such functions, audits, yield calculations and subsequent investigations as necessary or appropriate to comply with the Bond Purchase Agreement and the requirements of Bond Counsel, provided such engagement is done in accordance with applicable law of the State.

Section 2.8 Ratifying Other Actions. That all other actions taken by the Executive Director of the Department and the Department staff in connection with the issuance of the Bonds and the financing of the Development are hereby ratified and confirmed.

ARTICLE 3

CERTAIN FINDINGS AND DETERMINATIONS

Section 3.1 Findings of the Board. That in accordance with Section 2306.223 of the Act and after the Department's consideration of the information with respect to the Development and the information with respect to the proposed financing of the Development by the Department, including but not limited to the information submitted by the Borrower, independent studies commissioned by the Department, recommendations of the Department staff and such other information as it deems relevant, the Board hereby finds:

(a) Need for Housing Development.

(i) that the Development is necessary to provide needed decent, safe, and sanitary housing at rentals or prices that individuals or families of low and very low income or families of moderate income can afford,

(ii) that the financing of the Development is a public purpose and will provide a public benefit, and

(iii) that the Development will be undertaken within the authority granted by the Act to the housing finance division and the Borrower.

(b) Findings with Respect to the Borrower.

(i) that the Borrower, by operating the Development in accordance with the requirements of the Financing Agreement, the Tax Exemption Agreement and the Regulatory Agreement, will supply well-planned and well-designed housing for individuals or families of low and very low income or families of moderate income,

(ii) that the Borrower is financially responsible, and

(iii) that the Borrower is not, and will not enter into a contract for the Development with, a housing developer that (A) is on the Department's debarred list, including any parts of that list that are derived from the debarred list of the United States Department of Housing and Urban Development; (B) breached a contract with a public agency; or (C) misrepresented to a subcontractor the extent to which the developer has benefited from contracts or financial assistance that has been awarded by a public agency, including the scope of the developer's participation in contracts with the agency and the amount of financial assistance awarded to the developer by the Department.

(c) Public Purpose and Benefits.

(i) that the Borrower has agreed to operate the Development in accordance with the Financing Agreement, the Tax Exemption Agreement and the Regulatory

Agreement, which require, among other things, that the Development be occupied by individuals and families of low, very low and extremely low income and families of moderate income, and

(ii) that the issuance of the Bonds to finance the Development is undertaken within the authority conferred by the Act and will accomplish a valid public purpose and will provide a public benefit by assisting individuals and families of low, very low and extremely low income and families of moderate income in the State to obtain decent, safe, and sanitary housing by financing the costs of the Development, thereby helping to maintain a fully adequate supply of sanitary and safe dwelling accommodations at rents that such individuals and families can afford.

Section 3.2 Determination of Eligible Tenants. That the Board has determined, to the extent permitted by law and after consideration of such evidence and factors as it deems relevant, the findings of the staff of the Department, the laws applicable to the Department and the provisions of the Act, that eligible tenants for the Development shall be (1) individuals and families of low, very low and extremely low income, (2) persons with special needs, and (3) families of moderate income, with the income limits as set forth in the Tax Exemption Agreement and the Regulatory Agreement.

Section 3.3 Sufficiency of Loan Interest Rate. That, in accordance with Section 2306.226 of the Act, the Board hereby finds and determines that the interest rate on the Loan will produce the amounts required, together with other available funds, to pay for the Department's costs of operation with respect to the Bonds and the Development and enable the Department to meet its covenants with and responsibilities to the holders of the Bonds.

Section 3.4 No Gain Allowed. That, in accordance with Section 2306.498 of the Act, no member of the Board or employee of the Department may purchase any Bond in the secondary open market for municipal securities.

ARTICLE 4

GENERAL PROVISIONS

Section 4.1 Limited Obligations. That the Bonds and the interest thereon shall be special limited obligations of the Department payable solely from the trust estate created under the Indenture, including the revenues and funds of the Department pledged under the Indenture to secure payment of the Bonds, and under no circumstances shall the Bonds be payable from any other revenues, funds, assets or income of the Department.

Section 4.2 Non-Governmental Obligations. That the Bonds shall not be and do not create or constitute in any way an obligation, a debt or a liability of the State or create or constitute a pledge, giving or lending of the faith or credit or taxing power of the State. Each Bond shall contain on its face a statement to the effect that the State is not obligated to pay the

principal thereof or interest thereon and that neither the faith or credit nor the taxing power of the State is pledged, given or loaned to such payment.

Section 4.3 Effective Date. That this Resolution shall be in full force and effect from and upon its adoption.

Section 4.4 Notice of Meeting. This Resolution was considered and adopted at a meeting of the Governing Board that was noticed, convened, and conducted in full compliance with the Texas Open Meetings Act, Chapter 551 of the Texas Government Code, and with §2306.032 of the Texas Government Code, and the March 16, 2020 action by the Governor of the State of Texas under Section 418.016, Texas Government Code, suspending certain provisions of the Texas Open Meetings Act, regarding meetings of the Governing Board.

PASSED AND APPROVED this 21st day of May, 2020.

EXHIBIT A

Description of Development

Borrower: The Pines Preservation, LP, a Texas limited partnership

Development: The Development is a 152-unit affordable, multifamily housing development known as The Pines, located at 3451 Tangle Brush Drive, The Woodlands, TX 77381. It consists of twelve (12) residential apartment buildings and one (1) office/community building with approximately 129,912 net rentable square feet. The unit mix will consist of:

40	one-bedroom/one-bath units
72	two-bedroom/one-bath units
40	three-bedroom/one-and-one-half-bath units
152	Total Units

Unit sizes will range from approximately 636 square feet to approximately 1,098 square feet.

20612 The Pines - Application Summary

PROPERTY IDENTIFICATION		RECOMMENDATION					
Application #	20612	TDHCA Program		Request	Recommended		
Development	The Pines	LIHTC (4% Credit)		\$1,469,273	\$1,469,273	\$9,666/Unit	\$0.99
City / County	The Woodlands / Montgomery						
Region/Area	6 / Urban						
Population	General						
Set-Aside	General						
Activity	Acquisition/Rehab (Built in 1980)	Private Activity Bonds	\$22,000,000	3.52%	35	17	1st

KEY PRINCIPAL / SPONSOR		
<ul style="list-style-type: none"> Wes Larmore / The Related Companies, LP 		
Related Parties	Contractor - TBD	Seller - No

TYPICAL BUILDING ELEVATION/PHOTO



UNIT DISTRIBUTION			INCOME DISTRIBUTION		
# Beds	# Units	% Total	Income	# Units	% Total
Eff	-	0%	30%	-	0%
1	40	26%	40%	-	0%
2	72	47%	50%	-	0%
3	40	26%	60%	152	100%
4	-	0%	MR	-	✓
TOTAL	152	100%	TOTAL	152	100%

PRO FORMA FEASIBILITY INDICATORS			
Pro Forma Underwritten		Applicant's Pro Forma	
Debt Coverage	✓ 1.21	Expense Ratio	✓ 36.9%
Breakeven Occ.	✓ 84.4%	Breakeven Rent	\$1,292
Average Rent	\$1,455	B/E Rent Margin	✓ \$163
Property Taxes	\$1,113/unit	Exemption/PILOT	50%
Total Expense	\$6,142/unit	Controllable	\$3,492/unit

SITE PLAN



MARKET FEASIBILITY INDICATORS			
Gross Capture Rate (10% Maximum)		✓ 0.0%	
Highest Unit Capture Rate	🟡 19%	3 BR/50%	40
Dominant Unit Cap. Rate	✓ 7%	2 BR/50%	72
Premiums (↑60% Rents)	N/A	N/A	
Rent Assisted Units	152	100% Total Units	

DEVELOPMENT COST SUMMARY			
Costs Underwritten		TDHCA's Costs - Based on PCA	
Avg. Unit Size	855 SF	Density	18.3/acre
Acquisition		\$164K/unit	\$25,000K
Building Cost	\$46.15/SF	\$39K/unit	\$5,995K
Hard Cost		\$52K/unit	\$7,881K
Total Cost		\$288K/unit	\$43,763K
Developer Fee	\$5,320K	(51% Deferred)	Paid Year: 8
Contractor Fee	\$1,103K	30% Boost	Yes

REHABILITATION COSTS / UNIT					
Site Work	\$4K	8%	Finishes/Fixture	\$22K	42%
Building Shell	\$11K	22%	Amenities	\$3K	6%
HVAC	\$4K	8%	Total Exterior	\$19K	41%
Appliances	\$2K	4%	Total Interior	\$28K	59%

DEBT (Must Pay)					CASH FLOW DEBT / GRANT FUNDS					EQUITY / DEFERRED FEES	
Source	Term	Rate	Amount	DCR	Source	Term	Rate	Amount	DCR	Source	Amount
Wells Fargo Multifamily Capital	17/35	3.52%	\$22,000,000	1.46						Wells Fargo	\$14,544,346
										The Pines Developer, LLC	\$2,718,547
TOTAL DEBT (Must Pay)			\$26,500,000		CASH FLOW DEBT / GRANTS			\$0		TOTAL EQUITY SOURCES	\$17,262,893
										TOTAL DEBT SOURCES	\$26,500,000
										TOTAL CAPITALIZATION	\$43,762,893

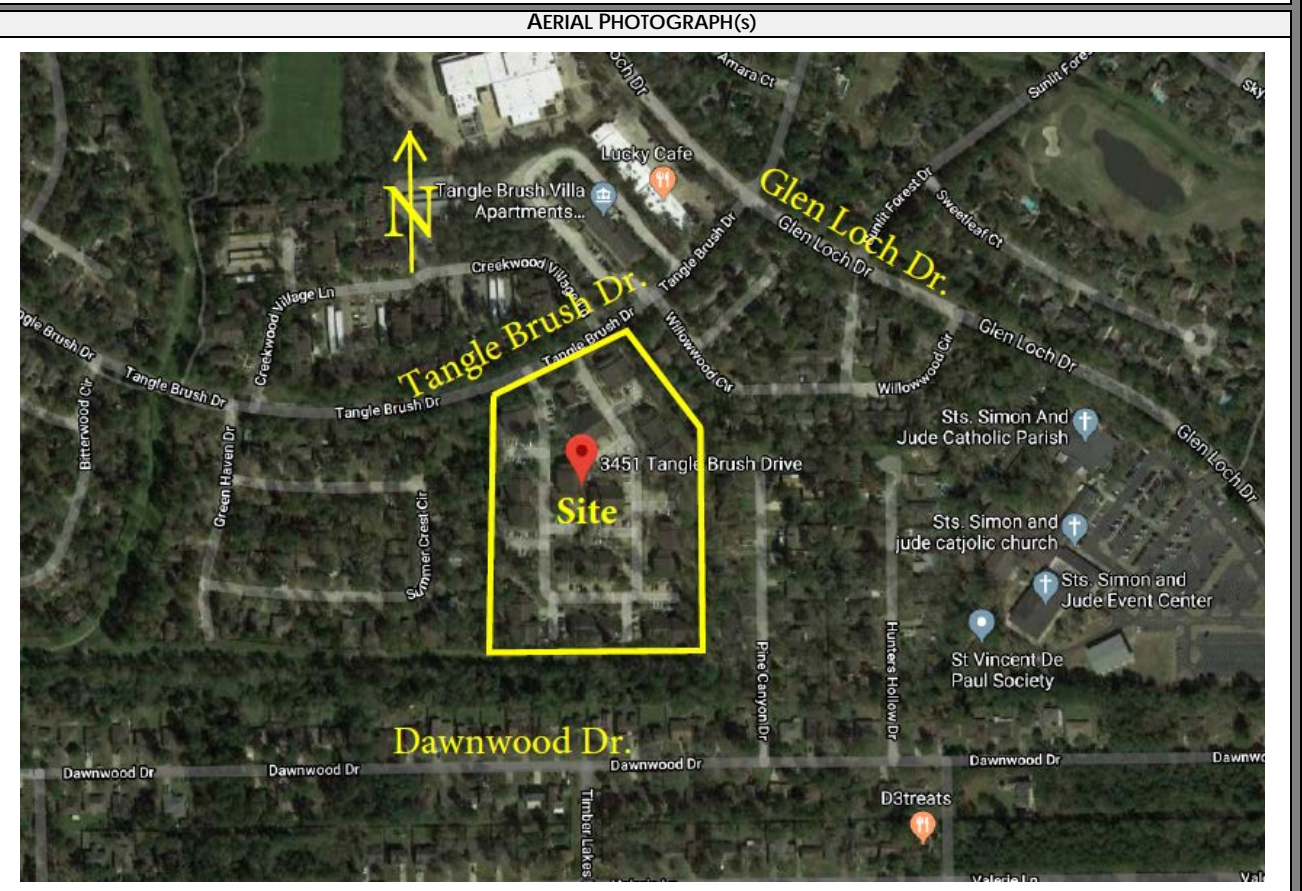
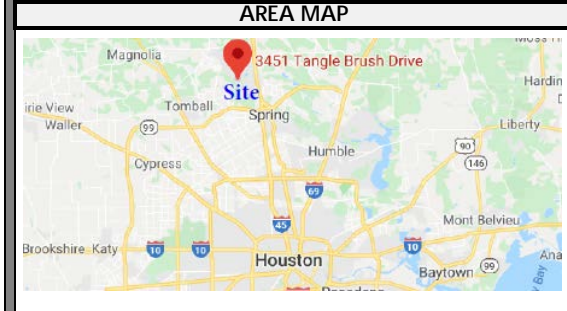
CONDITIONS

- 1 Receipt and acceptance before Determination Notice:
 - a: Evidence of the existing HAP Contract renewal or documentation from the third party administrator evidencing their approval of the contract renewal with rents increased to the current market rents presented in this application.
 - b: A revised term sheet from permanent lender that acknowledges Supportive Services pursuant to §11.302(d)(2)(K)(ii).
- 3 Documentation at Cost Certification clearing environmental issues identified in the ESA report, specifically:
 - Certification of comprehensive testing for asbestos; that any appropriate abatement procedures were implemented; and that any remaining asbestos-containing materials are being managed in accordance with an acceptable Operations and Maintenance (O&M) program.

Should any terms of the proposed capital structure change or if there are material changes to the overall development plan or costs, the analysis must be re-evaluated and adjustment to the credit allocation and/or terms of other TDHCA funds may be warranted.

BOND RESERVATION / ISSUER	
Issuer	TDHCA
Expiration Date	11/4/2020
Bond Amount	\$22,000,000
BRB Priority	Priority 3
Bond Structure	Fannie Mae MBS
% Financed with Tax-Exempt Bonds	59.4%

RISK PROFILE	
STRENGTHS/MITIGATING FACTORS	
o	100% of units covered under project-based HAP contract at market rents
o	Renovation should help maintain occupancy
o	Developer/Owner's construction and management experience with Texas HTC projects
WEAKNESSES/RISKS	
o	Project relies on partial property tax exemption for feasibility
o	40 year old development may have less appeal
o	Potential unforeseen deferred maintenance





DEVELOPMENT IDENTIFICATION

TDHCA Application #: 20612 Program(s): TDHCA Bonds/4% HTC

The Pines

Address/Location: 3451 Tangle Brush Drive

City: The Woodlands County: Montgomery Zip: 77381

Population: General Program Set-Aside: General Area: Urban

Activity: Acquisition/Rehab Building Type: Garden (Up to 4-story) Region: 6

Analysis Purpose: New Application - Initial Underwriting

ALLOCATION

TDHCA Program	REQUEST				RECOMMENDATION				
	Amount	Interest Rate	Amort	Term	Amount	Interest Rate	Amort	Term	Lien
Private Activity Bonds	\$22,000,000	3.52%	35	17	\$22,000,000	3.52%	35	17	1st
LIHTC (4% Credit)	\$1,469,273				\$1,469,273				

CONDITIONS

- 1 Receipt and acceptance before Determination Notice:
 - a: Evidence of the existing HAP Contract renewal or documentation from the third party administrator evidencing their approval of the contract renewal with rents increased to the current market rents presented in this application.
 - b: A revised term sheet from permanent lender that acknowledges Supportive Services pursuant to §11.302(d)(2)(K)(ii).
 - 2 Receipt and acceptance by Cost Certification:
 - Certification from the Appraisal District that project qualifies for a 50% property tax exemption.
 - 3 Documentation at Cost Certification clearing environmental issues identified in the ESA report, specifically:
 - Certification of comprehensive testing for asbestos; that any appropriate abatement procedures were implemented; and that any remaining asbestos-containing materials are being managed in accordance with an acceptable Operations and Maintenance (O&M) program.
- Should any terms of the proposed capital structure change or if there are material changes to the overall development plan or costs, the analysis must be re-evaluated and adjustment to the credit allocation and/or terms of other TDHCA funds may be warranted.

SET-ASIDES

TDHCA SET-ASIDES for HTC LURA		
Income Limit	Rent Limit	Number of Units
60% of AMI	60% of AMI	152

DEVELOPMENT SUMMARY

Subject is an existing 152 unit family property built in 1980. It is situated in the southeastern area of The Woodlands, within a 6 mile radius of the entire community. Location is proximate to schools, medical services, recreation, shopping and potential employers. The Woodlands is a Census Designated Place about 30 miles north of Houston via IH-45. Although it began as a bedroom community, it also became home to several corporate campuses, including Chevron Phillips Chemical, Huntsman Corporation, Woodforest National Bank, Baker Hughes, McDermott International and Halliburton. As of the end of 2018, it had a population of 117,305.

Applicant's budgeted renovations include site work and building cost that equal \$46K/unit.

All 152 units are currently covered by a HAP contract that will be continued with the new ownership.

RISK PROFILE

STRENGTHS/MITIGATING FACTORS	
▫	100% of units covered under project-based HAP contract at market rents
▫	Renovation should help maintain occupancy
▫	Developer/Owner's construction and management experience with Texas HTC projects

WEAKNESSES/RISKS	
▫	Project relies on partial property tax exemption for feasibility
▫	40 year old development may have less appeal
▫	Potential unforeseen deferred maintenance

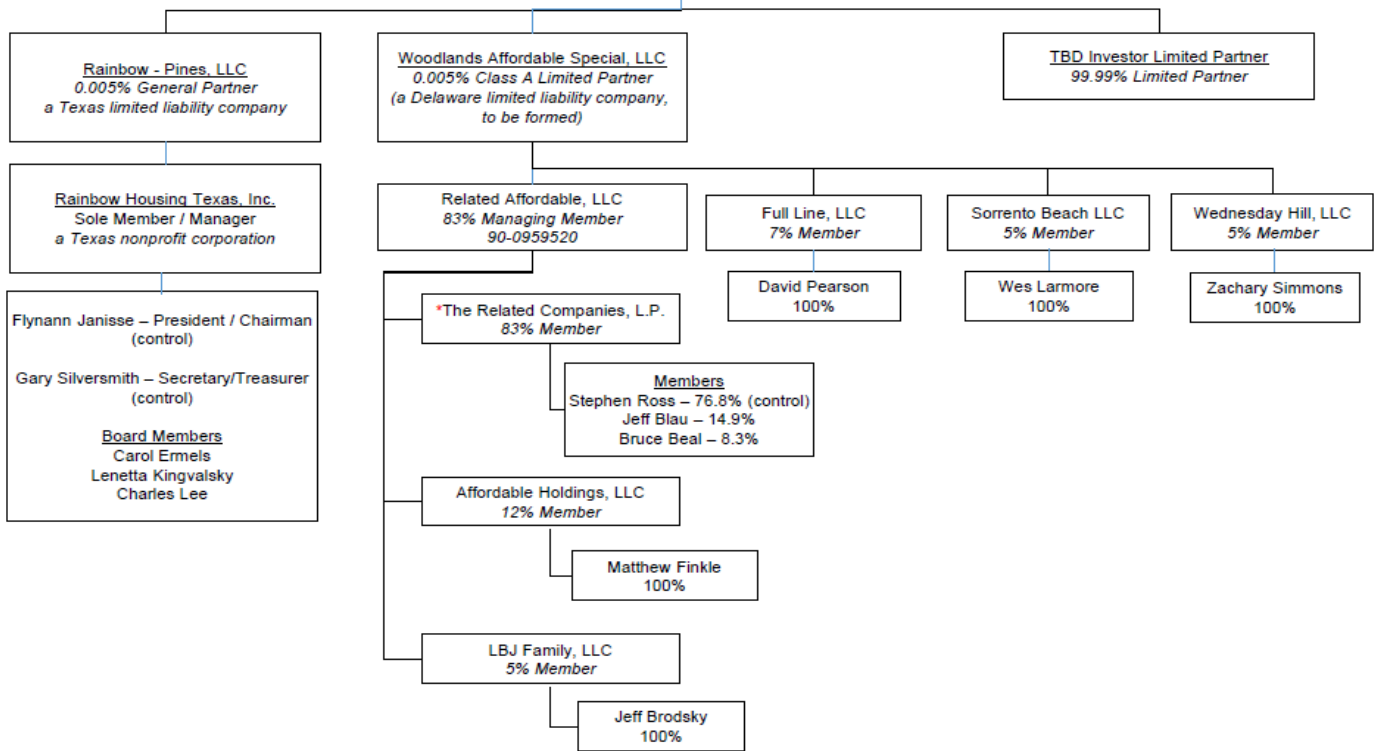
DEVELOPMENT TEAM

PRIMARY CONTACTS

Name: Wes Larmore
Phone: (213) 634-1566
Relationship: Sponsor/Developer

Name: _____
Phone: _____
Relationship: _____

OWNERSHIP STRUCTURE



- Applicant, Developer, Cost Estimator and Property Manager are related entities.
- The Related Companies organization was founded by Stephen Ross in 1972. Today, Related owns and operates a portfolio of assets valued at over \$30 billion. With offices in Boston, Chicago, Los Angeles, San Francisco, South Florida, Washington, D.C., Abu Dhabi, London and Shanghai, they manage an operating portfolio that includes luxury, affordable and workforce apartments, commercial, retail and mixed-use developments. Related Affordable, LLC is a subsidiary of The Related Companies, L.P., and has been involved with the development of over 27 HTC projects in Texas.
- Rainbow Housing Texas, Inc. is a CHDO started in 1999 and is an affiliate of Rainbow Housing Assistance Corporation. For more information visit rainbowhousing.org.

DEVELOPMENT SUMMARY

AERIAL



SITE PLAN



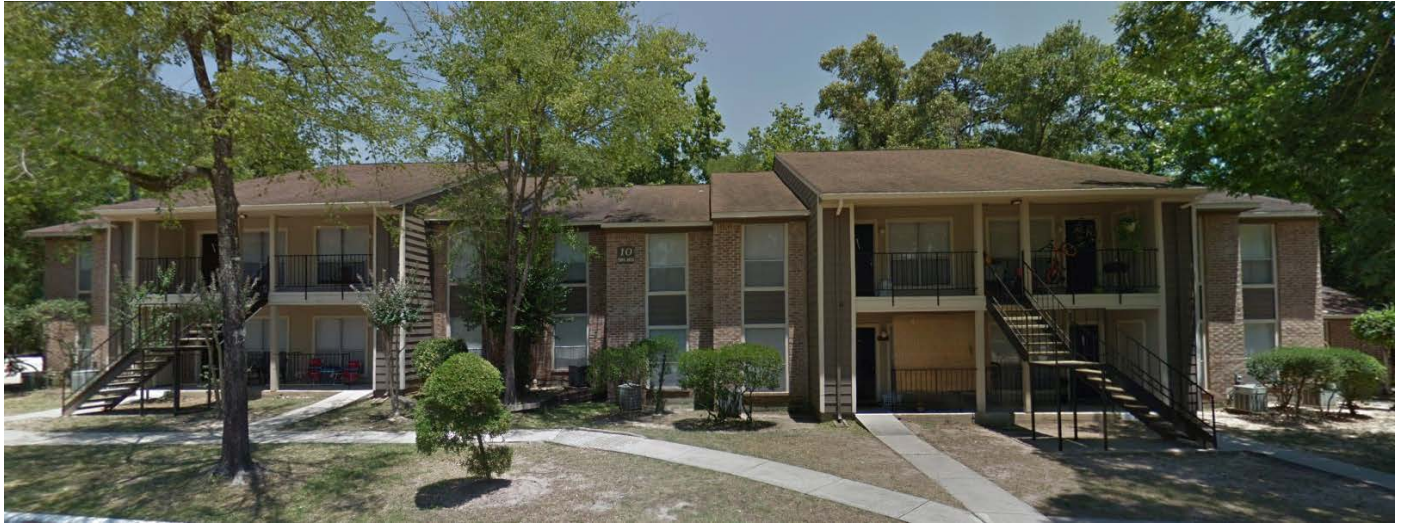
Comments:

Detention ponds are not utilized for storm water runoff. Drainage is provided by subsurface concrete piping to the municipal sewer main.

Site has 2 points of access off of Tangle Brush Dr.

Lot design accommodates building placement to provide close-in, open surface parking at no cost to the residents. Parking ratio is 3.3/unit (507 spaces).

TYPICAL BUILDING ELEVATION



Comments:

Built in 1980, subject is comprised of 12 two-story garden-style buildings along with a stand-alone clubhouse. All buildings are wood-framed on reinforced concrete foundations with pitched shingle roofs. Exteriors are a combination of brick and painted fiber cement lap board siding.

RELOCATION PLAN

Planned renovation activities will require tenants to be moved into another unit onsite for a period of five to seven days while work is being done on their unit. Should property be at 100% occupancy, a tenant- in place renovation may be implemented. The scope of work should not require any offsite tenant relocation or any prolonged tenant absences. Moving services will be provided along with additional assistance for any tenants that may require it.

Vacant units will be renovated during the first month. When the rehabilitation of these units is complete, tenants will be relocated into these apartments in accordance with a posted phasing schedule.

Every effort will be made to avoid any temporary displacement of existing tenants. Arrangements will be made to accommodate tenants during the time their unit is unavailable, including activities and food in the community room. If renovation activities require offsite accommodations, affected tenants will be moved to decent, safe and sanitary hotel/motel units that will be adequate for their needs.

Applicant has budgeted \$350K (\$2,303/unit) to cover possible relocation expenses.

BUILDING CONFIGURATION

Building Type	A	B	C	C1	D	D1	E	E1					Total Buildings
Floors/Stories	2	2	2	2	2	2	2	2					
Number of Bldgs	2	1	1	1	1	1	3	2					6
Units per Bldg	16	16	16	16	16	16	8	8					
Total Units	32	16	16	16	16	16	24	16					152
Avg. Unit Size (SF)	855 sf		Total NRA (SF)				129,912		Common Area (SF)				2,759

SITE AND ACQUISITION

Site Acreage: Development Site: 8.29 acres Density: 18.3 units/acre
Site Control: 8.29 **Site Plan:** 8.29 **Appraisal:** 8.29 **ESA:** 8.29

Control Type: Purchase and Sale Agreement Contract Expiration: 6/19/2020

Tract 1: 7.48 acres
 Tract 2: 9.65 acres
 Tract 3: 8.29 acres

Total Acquisition: 25.43 acres Cost: \$63,000,000
 Development Site: 8.29 acres Cost: \$25,000,000 \$164,474 per unit

Seller: PHR Woodlands Properties, L.L.C.

Buyer: Related Affordable, LLC

Assignee: _____

Related-Party Seller/Identity of Interest: No

Comments:

Purchase and Sale Agreement ("PSA") includes subject and Sponsor's other proposed project in The Woodlands, TDHCA #20611 - 333 Holly. The PSA explicitly states that the Purchaser is obligated to purchase both properties on the Closing Date unless otherwise agreed to by Seller at its sole discretion.

A price of \$25,000,000 has been allocated to this project as allowed by the contract.

Rainbow Housing Texas, Inc. is the sole member of the General Partner for this project. Their status as a non-profit CHDO is expected to provide a 50% property tax exemption.

APPRAISED VALUE

Appraiser: Gill Group Date: 12/23/2019

Land as Vacant:	<u>8.29</u> acres	<u>\$1,185,000</u>	Per Unit:	<u>\$7,796</u>
Existing Buildings: (as-is)		<u>\$26,115,000</u>	Per Unit:	<u>\$171,809</u>
Total Development: (as-is)		<u>\$27,300,000</u>	Per Unit:	<u>\$179,605</u>

Comments:

Appraised value was derived using the income capitalization approach. The appraiser determined a 6.00% market capitalization rate by giving the most weight to sales available in subject's market area. That rate was then adjusted down to 5.00% in order to compensate for the HAP contract rental subsidies on 100% of the units.

GENERAL INFORMATION

Flood Zone: <u> X </u>	Scattered Site? <u> No </u>
Zoning: <u> No Zoning </u>	Within 100-yr floodplain? <u> No </u>
Re-Zoning Required? <u> No </u>	Utilities at Site? <u> Yes </u>
Year Constructed: <u> 1980 </u>	Title Issues? <u> No </u>

Surrounding Uses:

Subject is located in a residential area with multifamily properties to the north and single family neighborhoods to the east, west and south.

HIGHLIGHTS of ENVIRONMENTAL REPORTS

Provider: Partner Engineering and Science, Inc. ("Partner") Date: 6/27/2019

Recognized Environmental Conditions (RECs) and Other Concerns:

- No REC's were found.
- Partner conducted a limited evaluation of suspect asbestos containing materials ("ACMs") including drywall systems, vinyl flooring and flooring mastic. The materials observed were not friable and in good condition. However, based on the original date of construction (1980), a comprehensive asbestos survey was recommended.

MARKET ANALYSIS

Provider: Gill Group, Inc. Date: 7/9/2019
 Contact: Samuel T Gill Phone: (573) 624-6614

Primary Market Area (PMA): 31 sq. miles 3 mile equivalent radius
 The PMA consists of 13 census tracts around the Woodlands.

ELIGIBLE HOUSEHOLDS BY INCOME								
Montgomery County Income Limits								
HH Size		1	2	3	4	5	6	7+
60% AMGI	Min	---	---	---	---	---	---	---
	Max	---	---	---	---	---	---	---

AFFORDABLE HOUSING INVENTORY									
Competitive Supply (Proposed, Under Construction, and Unstabilized)									
File #	Development				In PMA?	Type	Target Population	Comp Units	Total Units
	None								
Other Affordable Developments in PMA since 2015									
20402	333 Holly					A/R	General	n/a	332
Stabilized Affordable Developments in PMA (pre-2015)									
								Total Units	1,506
								Total Developments	6

Proposed, Under Construction, and Unstabilized Competitive Supply:

333 Holly(#20611) is a 100% HAP rehab by the same developer located one mile north of the Subject. Due to the presence of HAP contact, the units are no considered competitive.

OVERALL DEMAND ANALYSIS				
	Market Analyst		Underwriter	
	HTC	Assisted	HTC	Assisted
Total Households in the Primary Market Area		32,748		33,438
Senior Households in the Primary Market Area				
Potential Demand from the Primary Market Area		6,175		4,664
10% External Demand		618		466
Potential Demand from Other Sources		0		0
GROSS DEMAND		6,793		5,130
Subject Affordable Units		152		152
Unstabilized Competitive Units				
RELEVANT SUPPLY		152		152
Relevant Supply ÷ Gross Demand = GROSS CAPTURE RATE		2.2%		3.0%

Population:	General	Market Area:	Urban	Maximum Gross Capture Rate:	10%
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UNDERWRITING ANALYSIS of PMA DEMAND by AMGI BAND

* N/A due to all units qualifying from \$1 up.

Demand Analysis:

Capture rate limits do not apply to existing affordable housing that is at least 50% occupied and that provides a leasing preference to existing tenants. The Subject property is covered by a Housing Assistance Program contract, meaning that all households below the maximum income level are eligible and incomes are limited to 50% AMI and below.

Market Analyst qualified households from \$1 up to the 60% AMI maximum.

UNDERWRITING ANALYSIS of PMA DEMAND by UNIT TYPE										
Unit Type	Market Analyst					Underwriter				
	Demand	10% Ext	Subject Units	Comp Units	Unit Capture Rate	Demand	10% Ext	Subject Units	Comp Units	Unit Capture Rate
1 BR/50%						1,794	179	40	0	2%
1 BR/60%	1,590	159	40	0	2%					
2 BR/50%						929	93	72	0	7%
2 BR/60%	2,619	262	72	0	2%					
3 BR/50%						194	19	40	0	19%
3 BR/60%	541	54	40	0	7%					

Market Analyst Comments:

The subject is an existing family development that is 100 percent occupied. (p. 15)

Underwriter Comments:

Affordable properties still monitored in the PMA average 99% occupancy.

Revisions to Market Study:	0
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OPERATING PRO FORMA

SUMMARY- AS UNDERWRITTEN (Applicant's Pro Forma)

NOI:	\$1,599,713	Avg. Rent:	\$1,455	Expense Ratio:	36.9%
Debt Service:	\$1,317,639	B/E Rent:	\$1,292	Controllable Expenses:	\$3,492
Net Cash Flow:	\$282,074	UW Occupancy:	95.0%	Property Taxes/Unit:	\$1,113
Aggregate DCR:	1.21	B/E Occupancy:	84.4%	Program Rent Year:	2019

All 152 units are covered by a HUD Section 8 HAP contract. Sponsor has indicated that they will work with HUD to obtain a new 20-year contract through an Option 1b mark-up-to-market renewal.

Sponsor's Pro Forma reflects the anticipated increase in HAP rents outlined as follows:

Unit Type	Current Net HAP Rent	Anticipated Net HAP Rent	Increase	Variance
1BR/1BA	\$827	\$1,230	\$403	49%
2BR/1BA	\$1,014	\$1,410	\$396	39%
3BR/1.5BA	\$1,251	\$1,760	\$509	41%

While anticipated rent increases are significant, they are equivalent to the current market rent conclusions reported in the July 2019 Market Study done for this project.

With Rainbow Housing Texas, Inc. ("RHT") being the sole member of the GP, Sponsor is assuming a 50% CHDO property tax exemption. However, with no exemption, valuing the property using Montgomery County's 10% low income housing cap rate results in a projected property tax of \$310K. All else equal, DCR would drop to 1.07, indicating that the deal would be infeasible.

Proposed management fee of \$87,552 (3.46%) equates to the calculated HUD underwriting maximum of \$48/unit/month. The lower than typical fee is facilitated by Applicant's related party management company. However, assuming TDHCA's standard of 5% does not affect feasibility.

Low management fee and 50% property tax exemption facilitate a lower than typical expense ratio.

As presented, average rent with 1 month concession is still \$42 above break-even, but concessions should be unnecessary since all units are covered under a project-based HAP contract.

Coverage under the HAP contract also prompted the assumption of a 95% occupancy rate.

Breakeven occupancy occurs with 24 units vacant (underwritten at 8).

Applicant has budgeted \$50K for Supportive Services on this project. Pursuant to TDHCA underwriting rules, this amount will be included in the DCR calculation at cost certification, regardless if actually incurred.

Underwritten debt service includes TDHCA's 10 basis point Bond Administration Fee on the tax-exempt bond amount.

Pro Forma exhibits feasibility for over 35 years with a permanent loan rate of 3.52% fixed. Rate could increase by 39 basis points (to 3.91%) before first year DCR would drop below the minimum 1.15 threshold.

As underwritten, long-term Pro Forma exhibits a 15 year residual cash flow of \$4M after repayment of deferred developer fee.

Related-Party Property Management Company: Yes

Revisions to Rent Schedule:

1

Revisions to Annual Operating Expenses:

2

DEVELOPMENT COST EVALUATION

SUMMARY- AS UNDERWRITTEN (TDHCA's Costs- Based on PCA)

Acquisition	\$130,853/ac	\$164,474/unit	\$25,000,000	Contractor Fee	\$1,103,398
Off-site + Site Work		\$7,697/unit	\$1,170,000	Soft Cost + Financing	\$3,873,206
Building Cost	\$46.15/sf	\$39,440/unit	\$5,994,920	Developer Fee	\$5,319,894
Contingency	10.00%	\$4,714/unit	\$716,492	Reserves	\$584,983
Total Development Cost	\$287,914/unit	\$43,762,893		Rehabilitation Cost	\$47,138/unit
Qualified for 30% Basis Boost?	Located in a Small Area Difficult Development Area (SADDA)				

Acquisition:

This property and Sponsor's other Woodlands project at 333 Holly Creek Court (TDHCA #20402) are being sold under one Purchase and Sale Agreement ("PSA") for a purchase price of \$63M. The PSA specifies a \$23M price for this property and a \$40M price for 333 Holly Creek Court. However, Sponsor has allocated a total acquisition cost of \$25M for this project and \$37.2M for 333 Holly Creek, for a total \$62.2M.

Off-site:

None.

Site Work:

Budgeted site work cost of \$665K (\$4.4K/unit) is comprised of \$15K for grading, \$75K for concrete (sidewalk and curb repair), \$75K for paving (parking lot repair) and \$500K for on-site utilities (underground plumbing).

Amenity cost of \$505K (\$3.3/unit) includes \$290K for landscaping, \$35K for fencing and \$180K site security/accessibility.

Building Cost:

REHABILITATION COSTS / UNIT / % HARD COST

Site Work	\$665,000	\$4,375/unit	8%	Finishes/Fixtures	\$3,318,720	\$21,834/unit	42%
Building Shell	\$1,733,600	\$11,405/unit	22%	HVAC	\$657,600	\$4,326/unit	8%
Amenities	\$505,000	\$3,322/unit	6%	Appliances	\$285,000	\$1,875/unit	4%
Total Exterior	\$2,903,600	\$19,103/unit	41%	Total Interior	\$4,261,320	\$28,035/unit	59%

Site and Exterior renovations will include:

Site Improvements

- Landscaping
- Grading
- Playground
- Mailboxes
- Security
- Fencing
- Accessibility
- Parking lot - repair/fill pot holes - seal/stripe
- Concrete - repair damaged walks and curbs

Common Areas

- Laundry Rooms
- Community Room - ADA upgrades, addition
- DHW (central gas-fired boilers)
- On-site utilities (underground plumbing)
- Signage

Building Envelope

- Entry doors w/hardware - front, rear & storage
- Stairs
- Windows & patio doors
- Siding (Hardi), gutters, fascia, windows & sliding doors

Interior improvements to every unit will include:

Bathrooms

- Vanities
- Medicine cabinets
- Tubs & surrounds / valves & showerheads
- Toilet replacement
- New GFI outlets
- Lighting upgrades
- Fan replacement
- Accessories

Kitchens

- Cabinet replacements
- Counters
- Refrigerators - Energy Star
- Stoves
- Dishwashers and new electrical hook-up
- Suppression pucks
- Range hoods
- Lighting replacement
- New GFI outlets
- Sinks - stainless steel
- Faucets - single lever

General Interior (BR/LR/DR)

- Misc. painting/drywall repairs
- Plumbing
- ADA work
- Flooring replacement - all units
- Interior doors/hardware
- Smoke detectors
- Lighting
- HVAC - 16.5 SEE

Sponsor's exterior and interior costs are consistent with costs determined by the SCR provider.

Soft Costs:

As expected on a rehab, A&E costs are lower than typical at \$2.1K/unit, as are total soft costs at \$9.7K/unit (only 3.36% of total development cost).

Developer Fee:

Developer fee is overstated by \$16K.

Reserves:

Sponsor's total capital reserves represent approximately 3 months of operating expenses and debt service. No reserves are being transferred with the acquisition of the property.

Credit Allocation Supported by Costs:

Total Development Cost	Adjusted Eligible Cost	Credit Allocation Supported by Eligible Basis
\$43,762,893	\$40,843,352	\$1,498,422

Related-Party Contractor: _____ No

Related-Party Cost Estimator: _____ No

Revisions to Development Cost Schedule:	2
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UNDERWRITTEN CAPITALIZATION

BOND RESERVATION			
Issuer	Amount	Reservation Date	Priority
TDHCA	\$22,000,000	5/8/2020	Priority 3
Closing Deadline		Bond Structure	
11/4/2020		Fannie Mae MBS	

Percent of Cost Financed by Tax-Exempt Bonds	59.4%
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Comments:

The tax exempt bonds are projected to finance approximately 59% of the aggregate basis of the development, which exceeds the minimum 50% requirement to qualify for 4% tax credits under IRC§142.

INTERIM SOURCES				
Funding Source	Description	Amount	Rate	LTC
Wells Fargo Multifamily Capital	Tax Exempt Bonds	\$22,000,000	3.52%	50%
Wells Fargo Multifamily Capital - Taxable Loan	Taxable Loan Portion	\$4,500,000	3.51%	10%
Wells Fargo	HTC	\$12,362,694	\$0.99	28%
The Pines Developer, LLC	Deferred Fee	\$4,331,710	0.00%	10%
Reserves Funded Post Construction	Funded Reserves	\$584,983	0.00%	1%
		\$43,779,387	Total Sources	

PERMANENT SOURCES									
Debt Source	PROPOSED				UNDERWRITTEN				
	Amount	Interest Rate	Amort	Term	Amount	Interest Rate	Amort	Term	LTC
Wells Fargo Multifamily Capital	\$22,000,000	3.52%	35	17	\$22,000,000	3.52%	35	17	50%
Wells Fargo Multifamily Capital - Taxable Loan	\$4,500,000	3.51%	35	17	\$4,500,000	3.51%	35	17	10%
Total	\$26,500,000				\$26,500,000				

Comments:

TDHCA will make the tax-exempt bond loan through Fannie Mae's M.TEB Program (Mortgage Backed Securities as Tax Exempt Bond Collateral) and Wells Fargo will make the taxable loan through Fannie Mae's DUS (Delegated Underwriting & Servicing) conventional loan delivery for each project.

The tax-exempt and taxable loan for each project will be sized, on an aggregate basis, to meet the same underwriting standards as if there were one tax-exempt loan for that project.

The project-specific tax-exempt loan and taxable loan will be cross defaulted.

There will be separate loan agreements, notes and mortgages for the tax-exempt and taxable loan for this project and for 20611 - 333 Holly.

The bond mortgage for each project will be recorded first, the conventional mortgage will be recorded second.

The tax-exempt MTEB and conventional MBS will both be priced as first lien loans due to the cross default provision.

Equity & Deferred Fees	PROPOSED			UNDERWRITTEN			
	Amount	Rate	% Def	Amount	Rate	% TC	% Def
Wells Fargo	\$14,544,346	\$0.99		\$14,544,346	\$0.99	33%	
The Pines Developer, LLC	\$2,735,041		51%	\$2,718,547		6%	51%
Total	\$17,279,387			\$17,262,893			
				\$43,762,893	Total Sources		

Credit Price Sensitivity based on current capital structure	
\$1.175	Maximum Credit Price before the Development is oversourced and allocation is limited
\$0.813	Minimum Credit Price below which the Development would be characterized as infeasible

Revisions to Sources Schedule: 2

CONCLUSIONS

Recommended Financing Structure:

Gap Analysis:	
Total Development Cost	\$43,762,893
Permanent Sources (debt + non-HTC equity)	\$26,500,000
Gap in Permanent Financing	\$17,262,893

Possible Tax Credit Allocations:	Equity Proceeds	Annual Credits
Determined by Eligible Basis	\$14,832,892	\$1,498,422
Needed to Balance Sources & Uses	\$17,262,893	\$1,743,901
Requested by Applicant	\$14,544,346	\$1,469,273

	RECOMMENDATION	
	Equity Proceeds	Annual Credits
Tax Credit Allocation	\$14,544,346	\$1,469,273

	Amount	Interest Rate	Amort	Term	Lien
TDHCA-Issued Bonds	\$22,000,000	3.52%	35	17	1st

Deferred Developer Fee	\$2,718,547	(51% deferred)
Repayable in	8 years	

Comments:

Credit allocation is limited to \$1,469,273 as requested by Applicant.
 Applicant may request additional credits at cost certification based on actual costs.

Underwriter:	<u>Gregg Kazak</u>
Manager of Real Estate Analysis:	<u>Thomas Cavanagh</u>
Director of Real Estate Analysis:	<u>Brent Stewart</u>

UNIT MIX/RENT SCHEDULE

The Pines, The Woodlands, TDHCA Bonds/4% HTC #20612

LOCATION DATA

CITY:	The Woodlands
COUNTY:	Montgomery
Area Median Income	\$76,300
PROGRAM REGION:	6

UNIT DISTRIBUTION

# Beds	# Units	% Total	Assisted	MDL	Income	# Units	% Total
Eff	-	0.0%	0	0	20%	-	0.0%
1	40	26.3%	40	0	30%	-	0.0%
2	72	47.4%	72	0	40%	-	0.0%
3	40	26.3%	40	0	50%	-	0.0%
4	-	0.0%	0	0	60%	152	100.0%
5	-	0.0%	0	0	70%	-	0.0%
					80%	-	0.0%
					MR	-	0.0%
TOTAL	152	100.0%	152	-	TOTAL	152	100.0%

Pro Forma ASSUMPTIONS

Revenue Growth	2.00%
Expense Growth	3.00%
Basis Adjust	130%
Applicable Fraction	100.00%
APP % Acquisition	3.34%
APP % Construction	3.34%
Average Unit Size	855 sf

UNIT MIX / MONTHLY RENT SCHEDULE

HTC		RENT ASSISTED UNIT		UNIT MIX				APPLICABLE PROGRAM RENT			APPLICANT'S PRO FORMA RENTS				TDHCA PRO FORMA RENTS			MARKET RENTS			
Type	Gross Rent	Type	Gross Rent	# Units	# Beds	# Baths	NRA	Gross Rent	Utility Allow	Max Net Program Rent	Delta to Max	Rent psf	Net Rent per Unit	Total Monthly Rent	Total Monthly Rent	Rent per Unit	Rent psf	Delta to Max	Underwritten	Mkt Analyst	
TC 60%	\$859	HAP	\$1,293	40	1	1.0	636	\$1,293	\$63	\$1,230	\$0	\$1.93	\$1,230	\$49,200	\$49,200	\$1,230	\$1.93	\$0	\$1,230	\$1.93	\$1,230
TC 60%	\$1,030	HAP	\$1,493	72	2	1.0	841	\$1,493	\$83	\$1,410	\$0	\$1.68	\$1,410	\$101,520	\$101,520	\$1,410	\$1.68	\$0	\$1,410	\$1.68	\$1,410
TC 60%	\$1,191	HAP	\$1,861	40	3	1.5	1,098	\$1,861	\$101	\$1,760	\$0	\$1.60	\$1,760	\$70,400	\$70,400	\$1,760	\$1.60	\$0	\$1,760	\$1.60	\$1,760
TOTALS/AVERAGES:				152			129,912				\$0	\$1.70	\$1,455	\$221,120	\$221,120	\$1,455	\$1.70	\$0	\$1,455	\$1.70	\$1,455

ANNUAL POTENTIAL GROSS RENT:	\$2,653,440	\$2,653,440
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STABILIZED PRO FORMA

The Pines, The Woodlands, TDHCA Bonds/4% HTC #20612

STABILIZED FIRST YEAR PRO FORMA

	COMPARABLES		Actual FYE 2019	APPLICANT				TDHCA				VARIANCE	
	Database	Other		% EGI	Per SF	Per Unit	Amount	Amount	Per Unit	Per SF	% EGI	%	\$
POTENTIAL GROSS RENT				\$1.70	\$1,455	\$2,653,440	\$2,653,440	\$1,455	\$1.70		0.0%	\$0	
Laundry and Vending					\$3.29	\$6,000							
Tenant Charges (Late, Application Fees)					\$3.95	\$7,200							
Total Secondary Income					\$7.24		\$13,200	\$7.24			0.0%	\$0	
POTENTIAL GROSS INCOME						\$2,666,640	\$2,666,640				0.0%	\$0	
Vacancy & Collection Loss					5.0% PGI	(133,332)	(133,332)	5.0% PGI			0.0%	-	
Rental Concessions						-	-				0.0%	-	
EFFECTIVE GROSS INCOME						\$2,533,308	\$2,533,308				0.0%	\$0	

General & Administrative	\$58,017	\$382/Unit	\$47,309	\$311/Unit	\$51,231	\$337/Unit	3.00%	\$0.58	\$499	\$75,880	\$58,017	\$382	\$0.45	2.29%	30.8%	17,863
Management	\$61,372	5.2% EGI	\$57,250	\$377/Unit	\$71,936	\$473/Unit	3.46%	\$0.67	\$576	\$87,552	\$126,665	\$833	\$0.98	5.00%	-30.9%	(39,113)
Payroll & Payroll Tax	\$196,466	\$1,293/Unit	\$213,835	\$1,407/Unit	\$255,679	\$1,682/Unit	8.46%	\$1.65	\$1,411	\$214,400	\$255,679	\$1,682	\$1.97	10.09%	-16.1%	(41,279)
Repairs & Maintenance	\$112,096	\$737/Unit	\$96,630	\$636/Unit	\$84,859	\$558/Unit	3.26%	\$0.64	\$543	\$82,560	\$98,800	\$650	\$0.76	3.90%	-16.4%	(16,240)
Electric/Gas	\$28,619	\$188/Unit	\$24,764	\$163/Unit	\$30,173	\$199/Unit	1.34%	\$0.26	\$224	\$34,000	\$30,173	\$199	\$0.23	1.19%	12.7%	3,827
Water, Sewer, & Trash	\$98,498	\$648/Unit	\$116,718	\$768/Unit	\$85,529	\$563/Unit	4.89%	\$0.95	\$816	\$124,000	\$85,529	\$563	\$0.66	3.38%	45.0%	38,471
Property Insurance	\$57,017	\$0.44 /sf	\$44,589	\$293/Unit	\$49,164	\$323/Unit	1.50%	\$0.29	\$250	\$38,000	\$49,164	\$323	\$0.38	1.94%	-22.7%	(11,164)
Property Tax (@ 50%) 2.1965	\$113,361	\$746/Unit	\$119,306	\$785/Unit	\$191,748	\$1,262/Unit	6.68%	\$1.30	\$1,113	\$169,223	\$154,997	\$1,020	\$1.19	6.12%	9.2%	14,226
Reserve for Replacements	\$44,096	\$290/Unit	\$45,223	\$298/Unit		\$/Unit	1.80%	\$0.35	\$300	\$45,600	\$45,600	\$300	\$0.35	1.80%	0.0%	-
Cable TV			\$581	\$4/Unit		\$/Unit	0.00%	\$0.00	\$0	\$0	\$0	\$0	\$0.00	0.00%	0.0%	-
Supportive Services			\$21,234	\$140/Unit		\$/Unit	1.97%	\$0.38	\$329	\$50,000	\$50,000	\$329	\$0.38	1.97%	0.0%	-
TDHCA Compliance fees (\$40/HTC unit)			\$5,103	\$34/Unit		\$/Unit	0.24%	\$0.05	\$40	\$6,080	\$6,080	\$40	\$0.05	0.24%	0.0%	-
TDHCA Direct Loan Compliance Fees (\$34/MDL unit)			\$0	\$/Unit		\$/Unit	0.00%	\$0.00	\$0	\$0	\$0	\$0	\$0.00	0.00%	0.0%	-
TDHCA Bond Compliance Fee			\$0	\$/Unit		\$/Unit	0.15%	\$0.03	\$25	\$3,800	\$3,800	\$25	\$0.03	0.15%	0.0%	-
Bond Trustee Fees			\$0	\$/Unit		\$/Unit	0.10%	\$0.02	\$16	\$2,500	\$2,500	\$16	\$0.02	0.10%	0.0%	-
Security			\$24,133	\$159/Unit		\$/Unit	0.00%	\$0.00	\$0	\$0	\$0	\$0	\$0.00	0.00%	0.0%	-
Other			\$4,933	\$32/Unit		\$/Unit	0.00%	\$0.00	\$0	\$0	\$0	\$0	\$0.00	0.00%	0.0%	-
TOTAL EXPENSES							36.85%	\$7.19	\$6,142	\$ 933,595	\$967,004	\$6,362	\$7.44	38.17%	-3.5%	\$ (33,409)
NET OPERATING INCOME ("NOI")							63.15%	\$12.31	\$10,524	\$1,599,713	\$1,566,304	\$10,305	\$12.06	61.83%	2.1%	\$ 33,409

CONTROLLABLE EXPENSES									\$3,492/Unit			\$3,475/Unit				
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CAPITALIZATION / TOTAL DEVELOPMENT BUDGET / ITEMIZED BASIS

The Pines, The Woodlands, TDHCA Bonds/4% HTC #20612

DEBT / GRANT SOURCES															
APPLICANT'S PROPOSED DEBT/GRANT STRUCTURE								AS UNDERWRITTEN DEBT/GRANT STRUCTURE							
DEBT (Must Pay)	Fee	Cumulative DCR		Pmt	Rate	Amort	Term	Principal	Principal	Term	Amort	Rate	Pmt	Cumulative	
		UW	App											DCR	LTC
Wells Fargo Multifamily Capital		1.43	1.46	1,094,149	3.52%	35	17	\$22,000,000	\$22,000,000	17	35	3.52%	\$1,094,149	1.46	50.3%
Wells Fargo Multifamily Capital - Taxable Loan		1.28	1.31	\$128,571	3.51%	35	17	\$4,500,000	\$4,500,000	17	35	3.51%	\$223,490	1.21	10.3%
				\$1,222,720	TOTAL DEBT / GRANT SOURCES			\$26,500,000	\$26,500,000	TOTAL DEBT SERVICE			\$1,317,639	1.21	60.6%

NET CASH FLOW	\$343,584	\$376,993	APPLICANT NET OPERATING INCOME		\$1,599,713	\$282,074	NET CASH FLOW
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EQUITY SOURCES											
APPLICANT'S PROPOSED EQUITY STRUCTURE						AS UNDERWRITTEN EQUITY STRUCTURE					
EQUITY / DEFERRED FEES	DESCRIPTION	% Cost	Annual Credit	Credit Price	Amount	Amount	Credit Price	Annual Credit	% Cost	Annual Credits per Unit	Allocation Method
The Pines Developer, LLC	Deferred Developer Fees	6.2%	(51% Deferred)		\$2,735,041	\$2,718,547	(51% Deferred)		6.2%	Total Developer Fee: \$5,319,894	
	Additional (Excess) Funds Req'd	0.0%			\$0				0.0%		
TOTAL EQUITY SOURCES		39.5%			\$17,279,387	\$17,262,893			39.4%		

TOTAL CAPITALIZATION	\$43,779,387	\$43,762,893			15-Yr Cash Flow after Deferred Fee:	\$4,076,872
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DEVELOPMENT COST / ITEMIZED BASIS													
APPLICANT COST / BASIS ITEMS						TDHCA COST / BASIS ITEMS						COST VARIANCE	
	Eligible Basis		Total Costs			Total Costs			Eligible Basis		%	\$	
	Acquisition	New Const. Rehab							New Const. Rehab	Acquisition			
Land Acquisition			\$7,796 / Unit	\$1,185,000	\$1,085,165	\$7,139 / Unit					9.2%	\$99,835	
Building Acquisition	\$23,815,000		\$156,678 / Unit	\$23,815,000	\$23,914,835	\$157,334 / Unit			\$23,815,000		-0.4%	(\$99,835)	
Off-Sites		\$0	\$ / Unit	\$0	\$0	\$ / Unit			\$0		0.0%	\$0	
Site Work		\$665,000	\$4,375 / Unit	\$665,000	\$665,000	\$4,375 / Unit			\$665,000		0.0%	\$0	
Site Amenities		\$505,000	\$3,322 / Unit	\$505,000	\$505,000	\$3,322 / Unit			\$505,000		0.0%	\$0	
Building Cost		\$5,994,920	\$46.15 /sf	\$39,440/Unit	\$5,994,920	\$5,994,920	\$39,440/Unit	\$46.15 /sf	\$5,994,920		0.0%	\$0	
Contingency		\$716,492	10.00%	10.00%	\$716,492	\$716,492	10.00%	10.00%	\$716,492		0.0%	\$0	
Contractor Fees		\$1,103,398	14.00%	14.00%	\$1,103,398	\$1,103,398	14.00%	14.00%	\$1,103,398		0.0%	\$0	
Soft Costs	25,000	\$1,082,412		\$9,687 / Unit	\$1,472,412	\$1,472,412		\$9,687 / Unit	\$1,082,412	\$25,000	0.0%	\$0	
Financing	25,000	\$1,583,737		\$15,795 / Unit	\$2,400,795	\$2,400,795		\$15,795 / Unit	\$1,583,737	\$25,000	0.0%	\$0	
Developer Fee	\$3,588,744	\$1,747,644	15.03%	15.05%	\$5,336,388	\$5,319,894	15.00%	15.00%	\$1,747,644	\$3,579,750	0.3%	\$16,494	
Reserves				3 Months	\$584,983	\$584,983		3 Months			0.0%	\$0	
TOTAL HOUSING DEVELOPMENT COST (UNADJUSTED BASIS)	\$27,453,744	\$13,398,602		\$288,022 / Unit	\$43,779,387	\$43,762,893		\$287,914 / Unit	\$13,398,602	\$27,444,750	0.0%	\$16,494	
Acquisition Cost	\$0				\$0								
Contingency		\$0			\$0								
Contractor's Fee		\$0			\$0								
Financing Cost		\$0											
Developer Fee	\$2,105	\$2,951			(\$16,494)								
Reserves					\$0								
ADJUSTED BASIS / COST	\$27,455,849	\$13,398,602		\$287,914/unit	\$43,762,893	\$43,762,893		\$287,914/unit	\$13,398,602	\$27,444,750	0.0%	\$0	
TOTAL HOUSING DEVELOPMENT COSTS BASED ON 3RD PARTY PCA/CNA					\$43,762,893								

CAPITALIZATION / DEVELOPMENT COST BUDGET / ITEMIZED BASIS ITEMS

The Pines, The Woodlands, TDHCA Bonds/4% HTC #20612

CREDIT CALCULATION ON QUALIFIED BASIS				
	Applicant		TDHCA	
	Acquisition	Construction Rehabilitation	Acquisition	Construction Rehabilitation
ADJUSTED BASIS	\$27,455,849	\$13,398,602	\$27,444,750	\$13,398,602
Deduction of Federal Grants	\$0	\$0	\$0	\$0
TOTAL ELIGIBLE BASIS	\$27,455,849	\$13,398,602	\$27,444,750	\$13,398,602
High Cost Area Adjustment		130%		130%
TOTAL ADJUSTED BASIS	\$27,455,849	\$17,418,182	\$27,444,750	\$17,418,182
Applicable Fraction	100.00%	100.00%	100.00%	100.00%
TOTAL QUALIFIED BASIS	\$27,455,849	\$17,418,182	\$27,444,750	\$17,418,182
Applicable Percentage	3.34%	3.34%	3.34%	3.34%
ANNUAL CREDIT ON BASIS	\$917,025	\$581,767	\$916,655	\$581,767
CREDITS ON QUALIFIED BASIS	\$1,498,793		\$1,498,422	

Method	ANNUAL CREDIT CALCULATION BASED ON TDHCA BASIS		FINAL ANNUAL LIHTC ALLOCATION		
	Annual Credits	Proceeds	Credit Price \$0.9899	Variance to Request	
			Credit Allocation	Credits	Proceeds
Eligible Basis	\$1,498,422	\$14,832,892	----	----	----
Needed to Fill Gap	\$1,743,901	\$17,262,893	----	----	----
Applicant Request	\$1,469,273	\$14,544,346	\$1,469,273	\$0	\$0

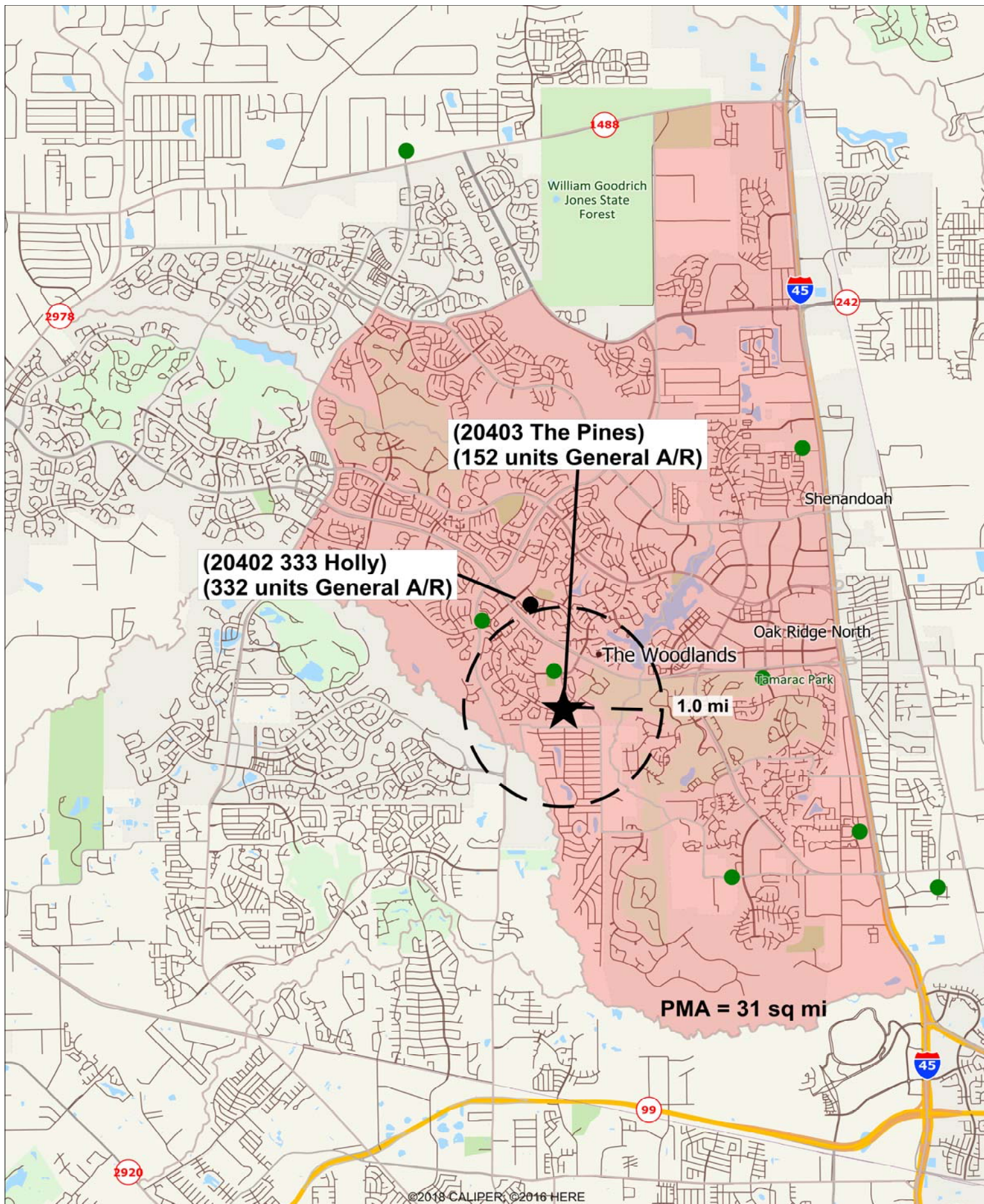
50% Test for Bond Financing for 4% Tax Credits					
Tax-Exempt Bond Amount	\$22,000,000		Percent Financed by Tax-Exempt Bonds	Applicant	TDHCA
Aggregate Basis Limit for 50% Test	\$44,000,000			59.4%	59.4%
	Applicant	TDHCA	amount aggregate basis can increase before 50% test fails		
Land Cost	\$1,185,000	\$1,085,165		\$6,934,042	\$6,934,042
Depreciable Bldg Cost	\$35,880,958	\$35,980,793		18.7%	18.7%
Aggregate Basis for 50% Test	\$37,065,958	\$37,065,958			

Long-Term Pro Forma

The Pines, The Woodlands, TDHCA Bonds/4% HTC #20612

	Growth Rate	Year 1	Year 2	Year 3	Year 4	Year 5	Year 10	Year 15	Year 20	Year 25	Year 30	Year 35
EFFECTIVE GROSS INCOME	2.00%	\$2,533,308	\$2,583,974	\$2,635,654	\$2,688,367	\$2,742,134	\$3,027,538	\$3,342,646	\$3,690,551	\$4,074,667	\$4,498,762	\$4,966,996
TOTAL EXPENSES	3.00%	\$933,595	\$960,727	\$988,656	\$1,017,405	\$1,046,998	\$1,208,527	\$1,395,239	\$1,611,088	\$1,860,653	\$2,149,235	\$2,482,970
NET OPERATING INCOME ("NOI")		\$1,599,713	\$1,623,247	\$1,646,998	\$1,670,962	\$1,695,136	\$1,819,011	\$1,947,407	\$2,079,463	\$2,214,014	\$2,349,527	\$2,484,026
EXPENSE/INCOME RATIO		36.9%	37.2%	37.5%	37.8%	38.2%	39.9%	41.7%	43.7%	45.7%	47.8%	50.0%
MUST -PAY DEBT SERVICE												
TOTAL DEBT SERVICE		\$1,317,639	\$1,317,639	\$1,317,639	\$1,317,639	\$1,317,639	\$1,317,639	\$1,317,639	\$1,317,639	\$1,317,639	\$1,317,639	\$1,317,639
DEBT COVERAGE RATIO		1.21	1.23	1.25	1.27	1.29	1.38	1.48	1.58	1.68	1.78	1.89
ANNUAL CASH FLOW												
		\$282,074	\$305,608	\$329,359	\$353,323	\$377,498	\$501,372	\$629,769	\$761,825	\$896,375	\$1,031,888	\$1,166,387
Deferred Developer Fee Balance		\$2,436,472	\$2,130,864	\$1,801,505	\$1,448,182	\$1,070,684	\$0	\$0	\$0	\$0	\$0	\$0
CUMULATIVE NET CASH FLOW		\$0	\$0	\$0	\$0	\$0	\$1,186,478	\$4,076,872	\$7,620,627	\$11,832,681	\$16,721,071	\$22,284,875

20612 The Pines PMA Map



Disclaimer: This map is not a survey. Boundaries, distance and scale are approximate only.

TEXAS DEPARTMENT OF HOUSING & COMM AFFAIRS

Moderator: Teresa Morales
April 30, 2020
4:52 pm CT

Teresa Morales: Good afternoon. This is Teresa Morales with the Texas Department of Housing and Community Affairs and the purpose of this conference call, if you will, is for a public hearing with respect to the Pines Apartments. And just to give some folks a few more minutes to dial in if they wish to we'll just hold off a couple of minutes before getting started.

Good Afternoon. This is Teresa Morales, again, with the Texas Department of Housing and Community Affairs. We will go ahead and get started. This is for a (inaudible) public hearing with respect to the Pines Apartments. There is a speech that is required for me to read, for purposes of Internal Revenue code. And I will go ahead and read that speech and it will be at the conclusion of that where, if there are any interested persons who wish to express public comment with respect to this proposed development, it will be at that time when you can do so.

Good afternoon. My name is Teresa Morales and I would like to proceed with the public hearing. Let the record show that it is 5:05 pm, Tuesday, April 30, 2020 and we are conducting a public hearing on behalf of the Texas

Department of Housing and Community Affairs with respect to an issue of tax-exempt multifamily revenue bonds for a residential rental community. This hearing is required by the Internal Revenue code. The sole purpose of this hearing is to provide a reasonable opportunity for interested individuals to express their views regarding the development and the proposed bond issue. The decision regarding the development will be made at this hearing. The Department's Board is scheduled to meet to consider the transaction on May 21, 2020.

In addition to providing your comments at this hearing the public is also invited to provide comment directly to the Board at any of their meetings.

The bonds will be issued as tax-exempt multifamily revenue bonds in the aggregate principal amount not to exceed \$30,000,000 in taxable bonds, if necessary, in an amount to be determined and issued in one or more series by the Texas Department of Housing and Community Affairs, the issuer.

The proceeds of the bonds will be loaned to the Pines Preservation LP or a related person or affiliate entity thereof. The financial portion of the cost of acquiring, rehabbing, and equipping a multifamily rental housing community described as follows:

A 152 unit multifamily residential rental development to be located on approximately 8.29 acres of land located at 3451 Tangle Brush Drive, The Woodlands, Montgomery County, Texas, 77381.

The proposed multifamily rental housing community will be initially owned and operated by the borrower or a related person or affiliate thereof.

I would now like to open the floor for public comment and we'll open the line.

Operator: All participants are now in interactive talk mode.

Teresa Morales: And now the floor is opened for public comment. Are there any individuals on the line who like to express public comment with respect to the Pines Apartments?

Hearing none, the meeting is now adjourned and the time is 5:07 pm.

END

5d

BOARD ACTION REQUEST

BOND FINANCE DIVISION

MAY 21, 2020

Presentation, discussion, and possible action regarding the Issuance of Multifamily Housing Revenue Bonds (The Walzem) Resolution No. 20-022 and a Determination Notice of Housing Tax Credits

RECOMMENDED ACTION

WHEREAS, the Board previously approved an allocation of 4% Housing Tax Credits (HTC) and award of \$4,000,000 in TCAP RF at the Board meeting of December 12, 2019;

WHEREAS, the applicant subsequently changed bond issuers from Bexar County Housing Finance Corporation to TDHCA and received a 2020 Certificate of Reservation (Reservation), thereby making this application subject to the 2020 QAP and rules;

WHEREAS, the Board adopted an inducement resolution for The Walzem at the Board meeting of February 27, 2020;

WHEREAS, a 4% Housing Tax Credit application for The Walzem, sponsored by Cohen-Esrey Walzem, LLC, and Bexar Management and Development Corporation was submitted to the Department on February 24, 2020;

WHEREAS, a Reservation was issued in the amount of \$20,000,000 on March 12, 2020, with a bond delivery deadline of September 8, 2020;

WHEREAS, the \$4,000,000 TCAP RF awarded under the 2019-1 Multifamily Direct Loan Notice of Funding Availability remains in place and the applicant has requested to opt into the 2020 rules for Direct Loan purposes in accordance with 10 TAC §13.5(i) as a TCAP RF Contract has not yet been executed (the requirements of the 2019-1 NOFA will remain); and

WHEREAS, under agenda item 4 the Board considered the compliance history of the applicant based on the recently adopted Previous Participation rules and only if the compliance history has been deemed acceptable by the Board should this agenda item regarding the issuance of Multifamily Housing Revenue Bonds and 4% Housing Tax Credits be considered; and

NOW, therefore, it is hereby

RESOLVED, that the issuance of unrated Multifamily Housing Revenue Bonds (The Walzem) for \$20,000,000, pursuant to Resolution No. 20-022 is hereby approved in the form presented to this meeting;

FURTHER RESOLVED, the issuance of a Determination Notice of \$1,280,892 in 4% Housing Tax Credits for The Walzem, subject to underwriting conditions that may be applicable as found in the Real Estate Analysis report posted to the Department's website, is hereby approved in the form presented to this meeting;

FURTHER RESOLVED, that the Development will be subject to the 2020 rules and the requirements of the 2019-1 NOFA; and

FURTHER RESOLVED, that if approved, staff is authorized, empowered, and directed, for and on behalf of the Department to execute such documents, instruments and writings and perform such acts and deeds as may be necessary to effectuate the foregoing.

BACKGROUND

General Information: The Bonds will be issued in accordance with Tex. Gov't Code §2306.353 *et seq.*, which authorizes the Department to issue revenue bonds for its public purposes, as defined therein. Tex. Gov't Code §2306.472 provides that the Department's revenue bonds are solely obligations of the Department, and do not create an obligation, debt or liability of the State of Texas or a pledge or loan of faith, credit or taxing power of the State of Texas.

Development Information: The Walzem Apartments are to be located at 7810 Walzem Road in San Antonio, Bexar County, and proposes the new construction of 200 units that will serve the general population. The Reservation from the Bond Review Board was issued under the Priority 3 designation, which does not have a prescribed restriction on the percentage of Area Median Family Income (AMFI) that must be served. All 200 units will be rent and income restricted at 60% of AMFI.

Organizational Structure and Previous Participation: The Borrower is The Walzem Apartments, LLC and includes the entities and principals as illustrated in Exhibit A. The applicant's portfolio was originally considered a Category 3; however, under agenda item 4 on today's agenda, the Board utilized their discretion and evaluated the compliance history of the applicant under the Previous Participation Rules adopted at the Board meeting of April 23, 2020. Pursuant to that agenda item, the Board deemed the previous participation acceptable.

Tax Equity and Fiscal Responsibility Act (TEFRA) Public Hearing/Public Comment: In light of COVID-19 and the inability for an in-person TEFRA hearing to be held, staff proceeded (under guidance from Bracewell, bond counsel to the Department), to conduct a telephonic hearing for the

proposed development which was held on April 28, 2020. Given that it was via telephone and would ordinarily be difficult to discern exactly how many individuals participated in the hearing, there is an option on the call line to obtain a participant count. For this hearing there were eight attendees, among which were several staff conducting the hearing, as well as members of the development team. A copy of the hearing transcript is included herein.

Staff notes that the previous application through a local issuer received some opposition and that same opposition was presented before the Board at the time the inducement resolution was adopted. While the application has been under review with the Department serving as bond issuer there has been no additional public comment submitted. The prior opposition included the following: 22 letters, signed by 24 individuals, and a petition signed by 27 individuals expressing opposition to the development and a letter from Bexar County Commissioner Tommy Calvert was also submitted with the prior application.

Summary of Financial Structure

Under the proposed structure, the Department will issue unrated tax-exempt multifamily bonds in the amount of \$20,000,000 that will be initially purchased by JP Morgan Chase. The bonds will be variable rate, but will be effectively fixed for the first year, the rate will be reset for the second year, and monthly thereafter until conversion.

Bank of America will provide a taxable construction loan that will be used to cash collateralize the bonds purchased by JP Morgan Chase. The construction loan will carry an interest rate equal to the LIBOR Daily Floating Rate plus 1.95%. Bank of America will provide approximately \$7,450,000 as an equity bridge loan.

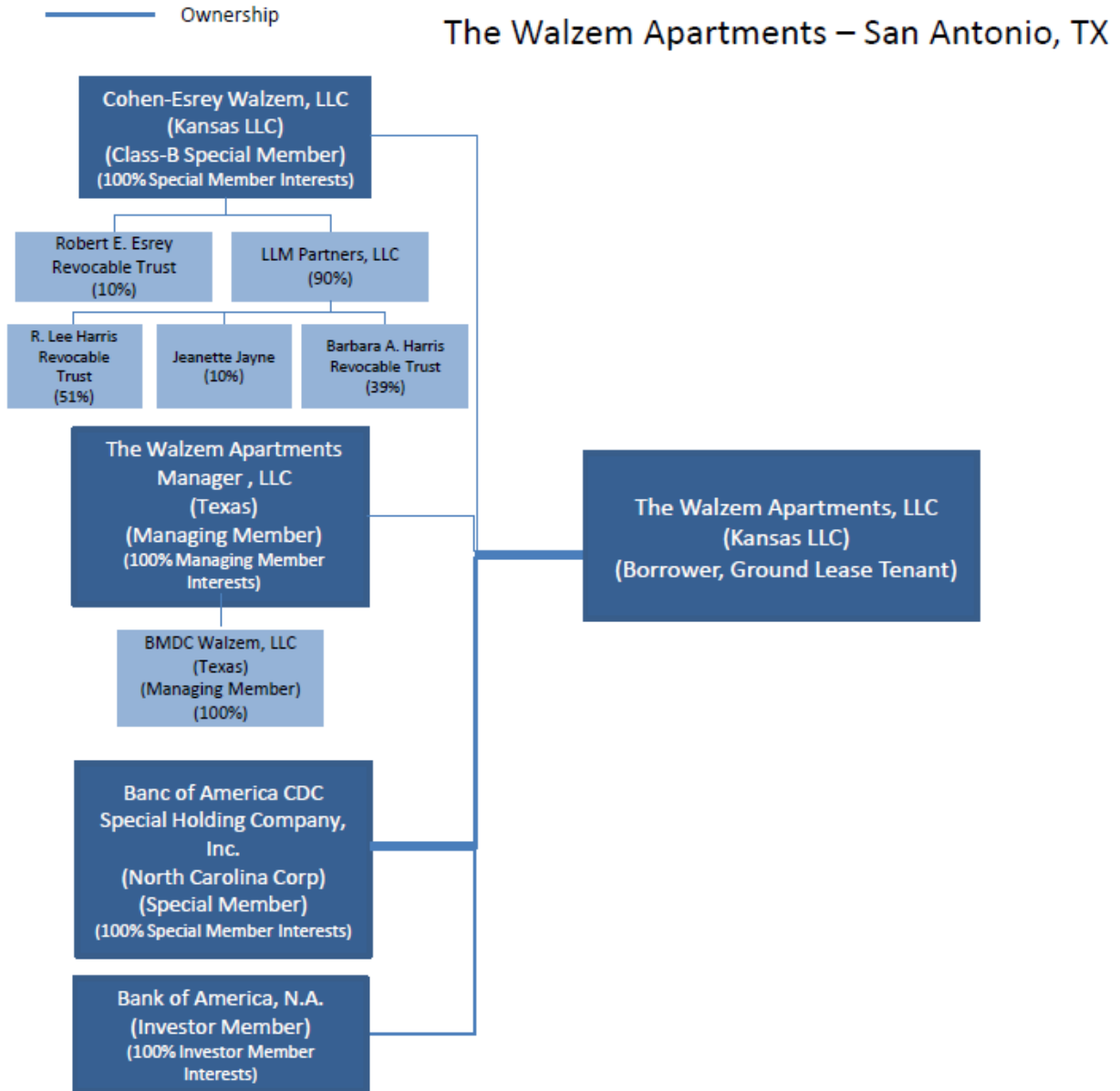
At conversion, Cedar Rapids Bank and Trust will purchase the bonds from JP Morgan Chase, and will serve as the permanent lender for the remainder of the term of the bonds. The cash collateral will be released to repay the Bank of America taxable construction loan. There will be a forward starting swap in place at closing of the bonds that will commence at conversion, and will terminate 16 years later, in July of 2039. The borrower will pay a fixed interest rate to the swap counterparty (CRBT) and the swap counterparty will pay a variable interest rate in return to the bondholder (CRBT). While the Department is not a party to the swap agreement, the swap payments will flow through the indenture to the trustee. The bonds will have a variable interest rate equal to 79% of 1 Month LIBOR plus 2.00%, which will match the amount paid by Cedar Rapids Bank and Trust as swap counterparty. The loan will have term of 16 years and a 40 year amortization. The final maturity date of the bonds is July 9, 2039.

As previously noted, the award of TCAP RF Direct Loan funds of \$4,000,000 remains in place but has been re-evaluated as part of the proposed bond issuance and new determination of 4% Housing Tax Credits. The current underwriting report reflects a slightly reduced amount of \$3,875,000. However, because the NOFA in which these funds were awarded is closed and there are no commitment or expenditure deadlines associated with these funds, staff is not

recommending that this loan be reduced by today's Board Action. This leaves an opportunity for that amount to go back up to \$4,000,000 should the 2020 HOME rents be published and/or a decrease in the first lien loan interest rate occur prior to closing, but in no case later than September 8, 2020.

A copy of the Exhibits recommended to be approved by the Board as referenced in Resolution No. 20-022 can be found online at TDHCA's Board Meeting Information Center website at <http://www.tdhca.state.tx.us/board/meetings.htm>.

Exhibit A



RESOLUTION NO. 20-022

RESOLUTION AUTHORIZING AND APPROVING THE ISSUANCE, SALE AND DELIVERY OF TEXAS DEPARTMENT OF HOUSING AND COMMUNITY AFFAIRS MULTIFAMILY HOUSING REVENUE BONDS (THE WALZEM) SERIES 2020; APPROVING THE FORM AND SUBSTANCE AND AUTHORIZING THE EXECUTION AND DELIVERY OF DOCUMENTS AND INSTRUMENTS PERTAINING THERETO; AUTHORIZING AND RATIFYING OTHER ACTIONS AND DOCUMENTS; AND CONTAINING OTHER PROVISIONS RELATING TO THE SUBJECT

WHEREAS, the Texas Department of Housing and Community Affairs (the "Department") has been duly created and organized pursuant to and in accordance with the provisions of Chapter 2306, Texas Government Code, as amended (the "Act"), for the purpose, among others, of providing a means of financing the costs of residential ownership, development, construction and rehabilitation that will provide decent, safe, and affordable living environments for individuals and families of low, very low and extremely low income (as defined in the Act) and families of moderate income (as described in the Act and determined by the Governing Board of the Department (the "Board") from time to time); and

WHEREAS, the Act authorizes the Department: (a) to make mortgage loans to housing sponsors to provide financing for multifamily residential rental housing in the State of Texas (the "State") intended to be occupied by individuals and families of low, very low and extremely low income and families of moderate income, as determined by the Department; (b) to issue its revenue bonds, for the purpose, among others, of obtaining funds to make such loans and provide financing, to establish necessary reserve funds and to pay administrative and other costs incurred in connection with the issuance of such bonds; and (c) to pledge all or any part of the revenues, receipts or resources of the Department, including the revenues and receipts to be received by the Department from such multifamily residential rental development loans, and to mortgage, pledge or grant security interests in such loans or other property of the Department in order to secure the payment of the principal or redemption price of and interest on such bonds; and

WHEREAS, the Board has determined to authorize the issuance of its Texas Department of Housing and Community Affairs Multifamily Housing Revenue Bonds (The Walzem), Series 2020 (the "Bonds") pursuant to and in accordance with the terms of a Trust Indenture (the "Indenture") between the Department and Wilmington Trust, National Association, as trustee (the "Trustee"), for the purpose of obtaining funds to finance the Development (defined below), all under and in accordance with the Constitution and laws of the State; and

WHEREAS, the Department desires to use the proceeds of the Bonds to fund a mortgage loan to The Walzem Apartments, LLC, a Kansas limited liability company (the "Borrower") in order to finance the cost of acquisition, construction and equipping of a qualified residential rental development described in Exhibit A attached hereto (the "Development") located within

the State and required by the Act to be occupied by individuals and families of low and very low income and families of moderate income, as determined by the Department; and

WHEREAS, the Board, by resolution adopted on February 27, 2020 declared its intent to issue its revenue bonds to provide financing for the Development; and

WHEREAS, the Borrower has requested and expects to receive a reservation of private activity bond allocation from the State of Texas; and

WHEREAS, it is anticipated that the Department, the Borrower and JPMorgan Chase Bank, N.A., a national banking association, as initial purchaser (the "Purchaser") will execute and deliver a Loan Agreement (the "Loan Agreement") pursuant to which (i) the Department will agree to make a mortgage loan funded with the proceeds of the Bonds (the "Loan") to the Borrower to enable the Borrower to finance the cost of the acquisition, construction and equipping of the Development and related costs, and (ii) the Borrower will execute and deliver to the Department a promissory note (the "Note") in an original principal amount equal to the original aggregate principal amount of the Bonds, and providing for payment of interest on such principal amount equal to the interest on the Bonds and to pay other costs described in the Loan Agreement; and

WHEREAS, it is anticipated that the Note will be secured by a Subordinate Multifamily Leasehold Deed of Trust, Security Agreement and Assignment of Rents and Leases (the "Bond Mortgage") from the Borrower for the benefit of the Department and assigned to the Trustee; and

WHEREAS, the Department's rights (except for certain unassigned rights) under the Indenture, the Note and the Bond Mortgage will be assigned to the Trustee pursuant to an Assignment of Deed of Trust and Loan Documents (the "Assignment") from the Department to the Trustee; and

WHEREAS, the Board has determined that the Department, the Trustee, Bexar Management and Development Corporation, a Texas nonprofit public facility corporation, as fee owner (the "Fee Owner"), and the Borrower will execute a Regulatory and Land Use Restriction Agreement (the "Regulatory Agreement") with respect to the Development, which will be filed of record in the real property records of Bexar County, Texas; and

WHEREAS, the Board has determined that the Department, the Trustee and the Borrower will execute a Tax Exemption Certificate and Agreement (the "Tax Exemption Agreement") to set forth various facts, certifications, covenants, representations, and warranties regarding the Bonds and the Development and to establish the expectations of the Department, the Trustee, and the Borrower as to future events regarding the Bonds, the Development, and the use and investment of Proceeds of the Bonds; and

WHEREAS, the Board has further determined that the Department will enter into a Bond Purchase Agreement (the "Bond Purchase Agreement") with the Borrower and the Purchaser,

setting forth certain terms and conditions upon which the Purchaser will purchase all of the Bonds from the Department and the Department will sell the Bonds to the Purchaser; and

WHEREAS, the Board has examined proposed forms of (a) the Indenture, the Loan Agreement, the Regulatory Agreement, the Assignment, the Tax Exemption Agreement, and the Bond Purchase Agreement (collectively, the "Issuer Documents"), all of which are attached to and comprise a part of this Resolution and (b) the Bond Mortgage and the Note; has found the form and substance of such documents to be satisfactory and proper and the recitals contained therein to be true, correct and complete; and has determined, subject to the conditions set forth in Article 1, to authorize the issuance of the Bonds, the execution and delivery of the Issuer Documents, the acceptance of the Bond Mortgage and the Note and the taking of such other actions as may be necessary or convenient in connection therewith;

NOW, THEREFORE, BE IT RESOLVED BY THE GOVERNING BOARD OF THE TEXAS DEPARTMENT OF HOUSING AND COMMUNITY AFFAIRS:

ARTICLE 1

ISSUANCE OF BONDS; APPROVAL OF DOCUMENTS

Section 1.1 Issuance, Execution and Delivery of the Bonds. That the issuance of the Bonds is hereby authorized pursuant to the Act, including particularly Section 2306.353 thereof, all under and in accordance with the conditions set forth herein and in the Indenture, and that, upon execution and delivery of the Indenture, the Authorized Representatives of the Department named in this Resolution are each hereby authorized to execute, attest and affix the Department's seal to the Bonds and to deliver the Bonds to the Attorney General of the State (the "Attorney General") for approval, the Comptroller of Public Accounts of the State for registration and the Trustee for authentication (to the extent required in the Indenture), and thereafter to deliver the Bonds to or upon the order of the initial purchaser thereof pursuant to the Bond Purchase Agreement.

Section 1.2 Interest Rate, Principal Amount, Maturity and Price. The Bonds shall bear interest at the Index Interest Rate (as defined in the Indenture), to be determined periodically and subject to adjustment as provided in the Indenture; provided that, in no event shall the interest rate (including any default rate) on the Bonds exceed the maximum interest rate permitted by applicable law; (ii) the aggregate principal amount of the Bonds shall be \$20,000,000; (iii) the final maturity of the Bonds shall be July 9, 2039; and (iv) the price at which the Bonds are sold to the Purchaser shall be the principal amount thereof.

Section 1.3 Approval, Execution and Delivery of the Indenture. That the form and substance of the Indenture are hereby approved, and that the Authorized Representatives (as defined in Section 1.13 below) each are hereby authorized to execute the Indenture, and to deliver the Indenture to the Trustee.

Section 1.4 Approval, Execution and Delivery of the Loan Agreement. That the form and substance of the Loan Agreement are hereby approved, and that the Authorized Representatives each are hereby authorized to execute the Loan Agreement, and to deliver the Loan Agreement to the Borrower.

Section 1.5 Approval, Execution and Delivery of the Regulatory Agreement. That the form and substance of the Regulatory Agreement are hereby approved, and that the Authorized Representatives each are hereby authorized to execute, attest and affix the Department's seal to the Regulatory Agreement, and to deliver the Regulatory Agreement to the Borrower, the Fee Owner and the Trustee and to cause the Regulatory Agreement to be filed of record in the real property records of Bexar County, Texas.

Section 1.6 Approval, Execution and Delivery of the Tax Exemption Agreement. That the form and substance of the Tax Exemption Agreement are hereby approved, and that the Authorized Representatives each are hereby authorized to execute the Tax Exemption Agreement, and to deliver the Tax Exemption Agreement to the Borrower and the Trustee.

Section 1.7 Approval, Execution and Delivery of the Bond Purchase Agreement. That the sale of the Bonds to the Purchaser is hereby approved, that the form and substance of the Bond Purchase Agreement are hereby approved, and that the Authorized Representatives each are hereby authorized to execute the Bond Purchase Agreement and to deliver the Bond Purchase Agreement to the Borrower and the Purchaser.

Section 1.8 Acceptance of the Note and the Bond Mortgage. That the form and substance of the Note and the Bond Mortgage are hereby accepted by the Department and that the Authorized Representatives each are hereby authorized to endorse and deliver the Note to the order of the Trustee without recourse.

Section 1.9 Approval, Execution and Delivery of the Assignment. That the form and substance of the Assignment are hereby approved, and that the Authorized Representatives each are hereby authorized to execute the Assignment, and to deliver the Assignment to the Trustee.

Section 1.10 Taking of Any Action; Execution and Delivery of Other Documents. That the Authorized Representatives are each hereby authorized to take any actions and to execute, attest and affix the Department's seal to, and to deliver to the appropriate parties, all such other agreements, commitments, assignments, bonds, certificates, contracts, documents, instruments, releases, financing statements, letters of instruction, notices of acceptance, written requests and other papers, whether or not mentioned herein, as they or any of them consider to be necessary or convenient to carry out or assist in carrying out the purposes of this Resolution.

Section 1.11 Power to Revise Form of Documents. That, notwithstanding any other provision of this Resolution, the Authorized Representatives are each hereby authorized to make or approve such revisions in the form of the documents attached hereto as exhibits as, in

the judgment of such Authorized Representative, and in the opinion of Bracewell LLP, Bond Counsel to the Department ("Bond Counsel"), may be necessary or convenient to carry out or assist in carrying out the purposes of this Resolution, such approval to be evidenced by the execution of such documents by the Authorized Representatives.

Section 1.12 Exhibits Incorporated Herein. That all of the terms and provisions of each of the documents listed below as an exhibit shall be and are hereby incorporated into and made a part of this Resolution for all purposes:

- Exhibit B - Indenture
- Exhibit C - Loan Agreement
- Exhibit D - Regulatory Agreement
- Exhibit E - Tax Exemption Agreement
- Exhibit F - Bond Purchase Agreement
- Exhibit G - Note
- Exhibit H - Bond Mortgage
- Exhibit I - Assignment

Section 1.13 Authorized Representatives. That the following persons are each hereby named as authorized representatives of the Department for purposes of executing, attesting, affixing the Department's seal to, and delivering the documents and instruments and taking the other actions referred to in this Article 1: the Chair or Vice Chair of the Board, the Executive Director of the Department, the Director of Administration of the Department, the Director of Financial Administration of the Department, the Director of Bond Finance and Chief Investment Officer of the Department, the Director of Multifamily Bonds of the Department, the Director of Texas Homeownership of the Department, and the Secretary or any Assistant Secretary to the Board. Such persons are referred to herein collectively as the "Authorized Representatives." Any one of the Authorized Representatives is authorized to act individually as set forth in this Resolution.

ARTICLE 2

APPROVAL AND RATIFICATION OF CERTAIN ACTIONS

Section 2.1 Approval and Ratification of Application to Texas Bond Review Board. That the Board hereby ratifies and approves the submission of the application for approval of state bonds to the Texas Bond Review Board on behalf of the Department in connection with the issuance of the Bonds in accordance with Chapter 1231, Texas Government Code.

Section 2.2 Approval of Submission to the Attorney General. That the Board hereby authorizes, and approves the submission by Bond Counsel to the Attorney General, for his approval, of a transcript of legal proceedings relating to the issuance, sale and delivery of the Bonds.

Section 2.3 Certification of the Minutes and Records. That the Secretary or Assistant Secretary to the Board hereby is authorized to certify and authenticate minutes and other records on behalf of the Department for the Bonds and all other Department activities.

Section 2.4 Authority to Invest Proceeds. That the Department is authorized to invest and reinvest the proceeds of the Bonds and the fees and revenues to be received in connection with the financing of the Development in accordance with the Indenture and the Tax Exemption Agreement and to enter into any agreements relating thereto only to the extent permitted by the Indenture and the Tax Exemption Agreement.

Section 2.5 Engagement of Other Professionals. That the Executive Director of the Department or any successor is authorized to engage auditors to perform such functions, audits, yield calculations and subsequent investigations as necessary or appropriate to comply with the Bond Purchase Agreement and the requirements of Bond Counsel, provided such engagement is done in accordance with applicable law of the State.

Section 2.6 Ratifying Other Actions. That all other actions taken by the Executive Director of the Department and the Department staff in connection with the issuance of the Bonds and the financing of the Development are hereby ratified and confirmed.

ARTICLE 3

CERTAIN FINDINGS AND DETERMINATIONS

Section 3.1 Findings of the Board. That in accordance with Section 2306.223 of the Act and after the Department's consideration of the information with respect to the Development and the information with respect to the proposed financing of the Development by the Department, including but not limited to the information submitted by the Borrower, independent studies commissioned by the Department, recommendations of the Department staff and such other information as it deems relevant, the Board hereby finds:

(a) Need for Housing Development.

(i) that the Development is necessary to provide needed decent, safe, and sanitary housing at rentals or prices that individuals or families of low and very low income or families of moderate income can afford,

(ii) that the financing of the Development is a public purpose and will provide a public benefit, and

(iii) that the Development will be undertaken within the authority granted by the Act to the housing finance division and the Borrower.

(b) Findings with Respect to the Borrower.

(i) that the Borrower, by operating the Development in accordance with the requirements of the Loan Agreement, the Tax Exemption Agreement and the Regulatory Agreement, will supply well-planned and well-designed housing for individuals or families of low and very low income or families of moderate income,

(ii) that the Borrower is financially responsible, and

(iii) that the Borrower is not, and will not enter into a contract for the Development with, a housing developer that (A) is on the Department's debarred list, including any parts of that list that are derived from the debarred list of the United States Department of Housing and Urban Development; (B) breached a contract with a public agency; or (C) misrepresented to a subcontractor the extent to which the developer has benefited from contracts or financial assistance that has been awarded by a public agency, including the scope of the developer's participation in contracts with the agency and the amount of financial assistance awarded to the developer by the Department.

(c) Public Purpose and Benefits.

(i) that the Borrower has agreed to operate the Development in accordance with the Loan Agreement, the Tax Exemption Agreement and the Regulatory Agreement, which require, among other things, that the Development be occupied by individuals and families of low and very low income and families of moderate income, and

(ii) that the issuance of the Bonds to finance the Development is undertaken within the authority conferred by the Act and will accomplish a valid public purpose and will provide a public benefit by assisting individuals and families of low and very low income and families of moderate income in the State to obtain decent, safe, and sanitary housing by financing the costs of the Development, thereby helping to maintain a fully adequate supply of sanitary and safe dwelling accommodations at rents that such individuals and families can afford.

Section 3.2 Determination of Eligible Tenants. That the Board has determined, to the extent permitted by law and after consideration of such evidence and factors as it deems relevant, the findings of the staff of the Department, the laws applicable to the Department and the provisions of the Act, that eligible tenants for the Development shall be (1) individuals and families of low and very low income, (2) persons with special needs, and (3) families of moderate income, with the income limits as set forth in the Tax Exemption Agreement and the Regulatory Agreement.

Section 3.3 Sufficiency of Loan Interest Rate. That the Board hereby finds and determines that the interest rate on the Loan established pursuant to the Loan Agreement will

produce the amounts required, together with other available funds, to pay for the Department's costs of operation with respect to the Bonds and the Development and enable the Department to meet its covenants with and responsibilities to the holders of the Bonds.

Section 3.4 No Gain Allowed. That, in accordance with Section 2306.498 of the Act, no member of the Board or employee of the Department may purchase any Bond in the secondary open market for municipal securities.

ARTICLE 4

GENERAL PROVISIONS

Section 4.1 Limited Obligations. That the Bonds and the interest thereon shall be special limited obligations of the Department payable solely from the trust estate created under the Indenture, including the revenues and funds of the Department pledged under the Indenture to secure payment of the Bonds, and under no circumstances shall the Bonds be payable from any other revenues, funds, assets or income of the Department.

Section 4.2 Non-Governmental Obligations. That the Bonds shall not be and do not create or constitute in any way an obligation, a debt or a liability of the State or create or constitute a pledge, giving or lending of the faith or credit or taxing power of the State. Each Bond shall contain on its face a statement to the effect that the State is not obligated to pay the principal thereof or interest thereon and that neither the faith or credit nor the taxing power of the State is pledged, given or loaned to such payment.

Section 4.3 Effective Date. That this Resolution shall be in full force and effect from and upon its adoption.

Section 4.4 Notice of Meeting. This Resolution was considered and adopted at a meeting of the Governing Board that was noticed, convened, and conducted in full compliance with the Texas Open Meetings Act, Chapter 551 of the Texas Government Code, and with Section 2306.032 of the Texas Government Code, and the March 16, 2020 action by the Governor of the State of Texas under Section 418.016, Texas Government Code, suspending certain provisions of the Texas Open Meetings Act regarding meetings of the Governing Board.

PASSED AND APPROVED this 21st day of May, 2020.

EXHIBIT A

Description of Development

Borrower: The Walzem Apartments, LLC, a Kansas limited liability company

Development: The Development is a 200-unit affordable, multifamily housing development to be known as The Walzem, to be located at 7810 Walzem Road, San Antonio, Bexar County, Texas 78244. It consists of two (2) residential apartment buildings with approximately 176,991 net rentable square feet. The unit mix will consist of:

60	one-bedroom/one-bath units
100	two-bedroom/two-bath units
40	three-bedroom/two-bath units
<hr/>	
200	Total Units

Unit sizes will range from approximately 670 square feet to approximately 1,165 square feet.



Addendum to Underwriting Report

TDHCA Application #: **20604** Program(s): **TDHCA Bonds / 4% HTC / MDL**

The Walzem

Address/Location: Northwest of the NWC of FM78 & Walzem Road

City: San Antonio County: Bexar Zip: 78244

APPLICATION HISTORY	
Report Date	PURPOSE
05/14/20	Revised Report with TDHCA as Bond Issuer.
12/05/19	Original Underwriting Report - Application number 19468

ALLOCATION

TDHCA Program	Previous Allocation				RECOMMENDATION				
	Amount	Rate	Amort	Term	Amount	Rate	Amort	Term	Lien
MF Direct Loan Const. to Perm. (Repayable)	\$4,000,000	2.50%	30	16	\$3,875,000	2.50%	30	16	4
Private Activity Bonds	N/A				\$20,000,000	3.60%	40	16	1
LIHTC (4% Credit)	\$1,326,147				\$1,280,892				

* Multifamily Direct Loan Terms:
 * Pursuant to 10 TAC §13.8(a), the term of a Multifamily Direct Loan should match the term of any superior loan (within 6
 * Lien position after conversion to permanent. The Department's lien position during construction may vary.

CONDITIONS STATUS

- Receipt and acceptance before Direct Loan Closing
 - a: Substantially final construction contract with Schedule of Values.
 - b: Updated term sheets with substantially final terms from all lenders
 - c: Substantially final draft of limited partnership agreement.
 - d: Senior loan documents (and/or partnership documents) must contain a provision(s) that any stabilization resizing on the senior debt includes the debt service on the TDHCA MDL at a minimum 1.15 DCR.
 - e: Documentation identifying any required matching funds, and confirming that the source is eligible to be counted as matching funds under HUD and TDHCA requirements.
 - Status (a - e):** pending
 - f: **Receipt and acceptance (no later than 7 business days prior to the Direct Loan Closing) of the third-party cost review used by the construction lender and/or limited partner. The Direct Loan amount will be reduced by the cost difference between the costs concluded by the third-party reviewer and the Applicant's Total Construction Contract indicated by the Applicant on the development cost schedule.**
- Status:** Satisfied. Third Party Plan and Cost Review was provided by Bank of America in the context of re-evaluation of the application with TDHCA as the Bond Issuer.

ANALYSIS

In December 2019 The Walzem received an award of 4% Housing Tax Credits in conjunction with a local Bond Issuer, and an award of a TDHCA Multifamily Direct Loan. No Determination Notice has been issued with regard to the tax credit award. They have since re-applied under a new bond reservation with TDHCA as the Bond Issuer.

Operating Pro Forma

Rents are updated to the 2020 HTC Program Rents for Bexar County. 2020 HOME Rents have not yet been released, so rents for the Low HOME and High HOME designated units remain at 2019 levels.

Effective Gross Income increased by \$27K (1.4%).

Minor adjustments to operating expenses include a reduction in the bond trustee fee but inclusion of the TDHCA bond compliance fee. Total annual operating expenses increased \$5K.

Without the expected property tax exemption debt coverage would drop to 0.91 times and the project would be considered infeasible.

Underwritten Net Operating Income (NOI) increased by \$22K (1.87%).

Development Cost

In the original analysis TDHCA's costing methodology and data from comparable developments resulted in a cost estimate that was significantly lower than the Applicant's proposed cost. Since the Applicant's total development cost varied by more than 7% from the TDHCA estimate, the total underwritten cost budget and the determination of the need for financing was based on the Underwriter's cost. That meant the total budget underwritten was about \$2.3M smaller than the Applicant's budget. But this difference had no impact on the credit allocation or Direct Loan award. The only direct impact was that the deferred Developer Fee was reduced from \$3.6M proposed by the Applicant to \$1.3M recommended by the Underwriter.

A condition was imposed, intended to be due before Closing on the Direct Loan, for the Applicant to provide a third party cost review commissioned by the construction lender or limited partner, to support the Applicant's cost estimate and verify the need for the Direct Loan funds. With the re-application for tax exempt bonds and a new determination notice on tax credits, the Applicant has provided the results of the third party cost review done for the construction lender Bank of America.

The Applicant's total hard construction cost has increased slightly, from \$20,688,553 to \$20,774,284. Total hard construction cost identified by the third party cost review is \$21,332,263 (\$558K higher than the Applicant's current budget). The Underwriter's estimate in the current analysis relies on the third party cost review. Since the Applicant's current budget is within 5% of the Underwriter's estimate, determination of the capital structure is based on the Applicant's cost schedule.

In the Applicant's cost schedule total contingency is \$159K higher than the 7% allowed by rule, and the amount of contingency included in eligible basis is \$106K higher than the 7% limit. The underwriting analysis makes these adjustments to total cost and to eligible basis.

If the actual development cost is ultimately equal to the third party cost review's higher estimate, the development would remain feasible with increased deferred developer fee.

Sources of Funds

BOND RESERVATION			
Issuer	Amount	Reservation Date	Priority
TDHCA	\$20,000,000	3/12/2020	3
Closing Deadline	Bond Structure		
9/8/2020	Private Placement		

Comments:

TDHCA will issue unrated tax-exempt multifamily bonds in the amount of \$20,000,000 that will be initially purchased by JP Morgan Chase.

INTERIM SOURCES

Funding Source	Description	Amount	Rate	LTC
Bank of America	Construction Loan	\$20,000,000	3.61%	64%
Bank of America	Equity Bridge Loan	\$7,450,000	3.71%	24%
TDHCA	Multifamily Direct Loan	\$3,875,000	0.00%	12%
		\$31,325,000	Total Sources	

Comments:

Bank of America will provide a taxable construction loan that will be used to cash collateralize the bonds purchased by JP Morgan Chase. The construction loan will carry an interest rate equal to the LIBOR Daily Floating Rate plus 1.95%. Bank of America will provide approximately \$7,450,000 as an equity bridge loan.

PERMANENT SOURCES

Debt Source	PROPOSED				UNDERWRITTEN				
	Amount	Interest Rate	Amort	Term	Amount	Interest Rate	Amort	Term	LTC
Cedar Rapids Bank & Trust	\$17,890,473	3.60%	40	16	\$17,890,473	3.60%	40	16	49%
TDHCA	\$4,000,000	2.50%	30	16	\$3,875,000	2.50%	30	16	11%
Total	\$21,890,473				\$21,765,473				

At conversion, Cedar Rapids Bank and Trust will purchase the bonds from JP Morgan Chase, and will serve as the permanent lender for the remainder of the term of the bonds. The cash collateral will be released to repay the Bank of America taxable construction loan. There will be a forward starting swap in place at closing of the bonds that will commence at conversion, and will terminate 16 years later, in July of 2039. The borrower will pay a fixed interest rate to the swap counterparty (CRBT) and the swap counterparty will pay a variable interest rate in return to the bondholder (CRBT). The bonds will have a variable interest rate equal to 79% of 1Month LIBOR plus 2.00%, which will match the amount paid by Cedar Rapids Bank and Trust as swap counterparty.

The permanent phase lien priority order is (1) TDHCA Bonds; (2) CRBT Loan; (3) Swap Agreement; (4) TDHCA Direct Loan.

The estimated tax exempt fixed interest rate for the CRBT loan as of May 5, 2020 is 3.60%. The loan is also subject to the TDHCA Bond Issuer Fee of 0.10%.

The TDHCA Board previously approved a \$4,000,000 construction to permanent Multifamily Direct Loan. The Direct Loan does not accrue interest during the construction period. After conversion the Direct Loan will amortize over 30 years at 2.50% interest with a maturity of 16 years (within 6 months of the senior debt).

Based on current underwriting analysis, overall debt coverage is 1.14 times. To achieve the minimum 1.15 DCR, the TDHCA Direct Loan amount must be reduced to \$3,875,000. This adjustment is subject to final budget evaluation before closing on the Direct Loan. If the estimated tax exempt fixed interest rate for the senior permanent debt decreases, and/or the 2020 Low HOME Rents for Bexar County increase, it is possible the pro forma would support the full \$4,000,000 Direct Loan amount at the minimum required debt coverage.

Equity & Deferred Fees	PROPOSED			UNDERWRITTEN			
	Amount	Rate	% Def	Amount	Rate	% TC	% Def
Bank of America - HTC Equity	\$12,682,810	\$0.99		\$12,679,550	\$0.99	35%	
Cohen-Esrey Development Group	\$1,906,031		46%	\$1,874,856		5%	46%
Total	\$14,588,841			\$14,554,406			
				\$36,319,879	Total Sources		

	RECOMMENDATION	
	Equity Proceeds	Annual Credits
Tax Credit Allocation	\$12,679,550	\$1,280,892

	Amount	Interest Rate	Amort	Term	Lien
TDHCA-Issued Bonds	\$20,000,000	3.60%	40	16	1
TDHCA Multifamily Direct Loan	\$3,875,000	2.50%	30	16	4

Deferred Developer Fee	\$1,874,856	(46% deferred)
Repayable in	9 years	

The Underwriter recommends that TDHCA issue \$20,000,000 in Tax Exempt Bonds; and issue a Determination Notice for \$1,280,892 in annual Housing Tax Credits.

The Board previously approved the award of a Multifamily Direct Loan in the amount of \$4,000,000 amortized over 30 years at 2.50% interest and maturing in 16 years. Current underwriting indicates a reduction in the principal amount to \$3,875,000. The principal amount is subject to final budget evaluation prior to closing.

Manager of Real Estate Analysis: Thomas Cavanagh

Director of Real Estate Analysis: Brent Stewart

UNIT MIX/RENT SCHEDULE

The Walzem, San Antonio, TDHCA Bonds/4% HTC #20604

LOCATION DATA

CITY:	San Antonio
COUNTY:	Bexar
Area Median Income	\$72,000
PROGRAM REGION:	9

UNIT DISTRIBUTION

# Beds	# Units	% Total	Assisted	MDL	Income	# Units	% Total
Eff	-	0.0%	0	0	20%	-	0.0%
1	60	30.0%	0	8	30%	-	0.0%
2	100	50.0%	0	13	40%	-	0.0%
3	40	20.0%	0	5	50%	-	0.0%
4	-	0.0%	0	0	60%	200	100.0%
5	-	0.0%	0	0	70%	-	0.0%
					80%	-	0.0%
					MR	-	0.0%
TOTAL	200	100.0%	-	26	TOTAL	200	100.0%

Pro Forma ASSUMPTIONS

Revenue Growth	2.00%
Expense Growth	3.00%
Basis Adjust	130%
Applicable Fraction	100%
APP % Acquisition	3.33%
APP % Construction	3.33%
Average Unit Size	885 sf

UNIT MIX / MONTHLY RENT SCHEDULE

HTC		TDHCA Direct Loan Program		UNIT MIX				APPLICABLE PROGRAM RENT			APPLICANT'S PRO FORMA RENTS				TDHCA PRO FORMA RENTS			MARKET RENTS			
Type	Gross Rent	Type	Gross Rent	# Units	# Beds	# Baths	NRA	Gross Rent	Utility Allow	Max Net Program Rent	Delta to Max	Rent psf	Net Rent per Unit	Total Monthly Rent	Total Monthly Rent	Rent per Unit	Rent psf	Delta to Max	Underwritten	Mrkt Analyst	
TC 60%	\$810	LH/50%	\$665	2	1	1	670	\$665	\$63	\$602	\$0	\$0.90	\$602	\$1,204	\$1,204	\$602	\$0.90	\$0	\$898	\$1.34	\$898
TC 60%	\$810	HH/60%	\$844	6	1	1	670	\$810	\$63	\$747	\$0	\$1.11	\$747	\$4,482	\$4,482	\$747	\$1.11	\$0	\$898	\$1.34	\$898
TC 60%	\$810			52	1	1	670	\$810	\$63	\$747	\$0	\$1.11	\$747	\$38,844	\$38,844	\$747	\$1.11	\$0	\$898	\$1.34	\$898
TC 60%	\$972	LH/50%	\$798	2	2	2	940	\$798	\$80	\$718	\$0	\$0.76	\$718	\$1,436	\$1,436	\$718	\$0.76	\$0	\$1,149	\$1.22	\$1,149
TC 60%	\$972	LH/50%	\$798	1	2	2	985	\$798	\$80	\$718	\$0	\$0.73	\$718	\$718	\$718	\$718	\$0.73	\$0	\$1,149	\$1.17	\$1,149
TC 60%	\$972	HH/60%	\$1,017	9	2	2	940	\$972	\$80	\$892	\$0	\$0.95	\$892	\$8,028	\$8,028	\$892	\$0.95	\$0	\$1,149	\$1.22	\$1,149
TC 60%	\$972	HH/60%	\$1,017	1	2	2	985	\$972	\$80	\$892	\$0	\$0.91	\$892	\$892	\$892	\$892	\$0.91	\$0	\$1,149	\$1.17	\$1,149
TC 60%	\$972			86	2	2	940	\$972	\$80	\$892	\$0	\$0.95	\$892	\$76,712	\$76,710	\$892	\$0.95	\$0	\$1,149	\$1.22	\$1,149
TC 60%	\$972			1	2	2	985	\$972	\$80	\$892	\$0	\$0.91	\$892	\$892	\$892	\$892	\$0.91	\$0	\$1,149	\$1.17	\$1,149
TC 60%	\$1,123	LH/50%	\$923	1	3	2	1,165	\$923	\$98	\$825	\$0	\$0.71	\$825	\$825	\$825	\$825	\$0.71	\$0	\$1,274	\$1.09	\$1,274
TC 60%	\$1,123	HH/60%	\$1,166	4	3	2	1,165	\$1,123	\$98	\$1,025	\$0	\$0.88	\$1,025	\$4,100	\$4,100	\$1,025	\$0.88	\$0	\$1,274	\$1.09	\$1,274
TC 60%	\$1,123			1	3	2	1,165	\$1,123	\$98	\$1,025	\$0	\$0.88	\$1,025	\$1,025	\$1,025	\$1,025	\$0.88	\$0	\$1,274	\$1.09	\$1,274
TC 60%	\$1,123			34	3	2	1,049	\$1,123	\$98	\$1,025	\$0	\$0.98	\$1,025	\$34,850	\$34,849	\$1,025	\$0.98	\$0	\$1,275	\$1.22	\$1,275
TOTALS/AVERAGES:				200			176,991				\$0	\$0.98	\$870	\$174,008	\$174,005	\$870	\$0.98	\$0	\$1,099	\$1.24	\$1,099

ANNUAL POTENTIAL GROSS RENT:	\$2,088,095	\$2,088,058
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STABILIZED PRO FORMA

The Walzem, San Antonio, TDHCA Bonds/4% HTC #20604

STABILIZED FIRST YEAR PRO FORMA

	COMPARABLES		APPLICANT				PRIOR REPORT		TDHCA				VARIANCE	
	Database	San Antonio	% EGI	Per SF	Per Unit	Amount	Applicant	TDHCA	Amount	Per Unit	Per SF	% EGI	%	\$
	POTENTIAL GROSS RENT				\$0.98	\$870	\$2,088,095	\$2,058,792	\$2,056,066	\$2,088,058	\$870	\$0.98		0.0%
vending, late fee						\$10.00	\$24,000	24,000						
Total Secondary Income						\$10.00		24,000	\$24,000	\$10.00			0.0%	\$0
POTENTIAL GROSS INCOME						\$2,112,095	\$2,082,792	\$2,080,066	\$2,112,058				0.0%	\$37
Vacancy & Collection Loss					7.5% PGI	(158,407)	(156,209)	(156,005)	(158,404)	7.5% PGI			0.0%	(3)
Rental Concessions						-	0	0	-				0.0%	-
EFFECTIVE GROSS INCOME						\$1,953,688	\$1,926,583	\$1,924,061	\$1,953,653				0.0%	\$35

General & Administrative	\$108,114	\$541/Unit	\$72,307	\$362	4.05%	\$0.45	\$396	\$79,194	\$74,023	\$74,023	\$74,023	\$370	\$0.42	3.79%	7.0%	5,171
Management	\$116,517	5.0% EGI	\$66,938	\$335	4.01%	\$0.44	\$392	\$78,390	\$79,200	\$76,962	\$78,146	\$391	\$0.44	4.00%	0.3%	244
Payroll & Payroll Tax	\$246,252	\$1,231/Unit	\$214,617	\$1,073	11.86%	\$1.31	\$1,158	\$231,632	\$230,632	\$214,617	\$214,617	\$1,073	\$1.21	10.99%	7.9%	17,015
Repairs & Maintenance	\$142,802	\$714/Unit	\$149,202	\$746	3.44%	\$0.38	\$336	\$67,162	\$65,000	\$120,000	\$120,000	\$600	\$0.68	6.14%	-44.0%	(52,838)
Electric/Gas	\$59,553	\$298/Unit	\$28,011	\$140	2.30%	\$0.25	\$225	\$45,000	\$45,000	\$47,074	\$47,110	\$236	\$0.27	2.41%	-4.5%	(2,110)
Water, Sewer, & Trash	\$125,166	\$626/Unit	\$129,700	\$649	4.35%	\$0.48	\$425	\$85,000	\$85,000	\$85,000	\$85,000	\$425	\$0.48	4.35%	0.0%	-
Property Insurance	\$56,922	\$0.32 /sf	\$52,237	\$261	3.94%	\$0.44	\$385	\$77,000	\$80,000	\$80,000	\$77,000	\$385	\$0.44	3.94%	0.0%	-
Property Tax (@ 0%) 2.2851	\$118,682	\$593/Unit	\$90,911	\$455	0.00%	\$0.00	\$0	\$0	\$0	\$0	\$0	\$0	\$0.00	0.00%	0.0%	-
Reserve for Replacements	\$58,826	\$294/Unit	\$66,158	\$331	2.56%	\$0.28	\$250	\$50,000	\$50,000	\$50,000	\$50,000	\$250	\$0.28	2.56%	0.0%	-
Supportive Services			-	\$0	0.92%	\$0.10	\$90	\$18,000	\$18,000	\$18,000	\$18,000	\$90	\$0.10	0.92%	0.0%	-
TDHCA Compliance fees (\$40/HTC unit)			-	\$0	0.41%	\$0.05	\$40	\$8,000	\$8,000	\$8,000	\$8,000	\$40	\$0.05	0.41%	0.0%	-
TDHCA Direct Loan Compliance Fees (\$34/MDL unit)				\$0	0.00%	\$0.00	\$0		\$850	\$884		\$0	\$0.00	0.00%	0.0%	-
TDHCA Bond Compliance Fee			-	\$0	0.26%	\$0.03	\$25	\$5,000	\$0	\$0	\$5,000	\$25	\$0.03	0.26%	0.0%	-
Bond Trustee Fees				\$0	0.28%	\$0.03	\$28	\$5,500	\$10,000	\$10,000	\$5,500	\$28	\$0.03	0.28%	0.0%	-
TOTAL EXPENSES					38.38%	\$4.24	\$3,749	\$ 749,878	\$745,705	\$784,561	\$782,396	\$3,912	\$4.42	40.05%	-4.2%	\$ (32,518)
NET OPERATING INCOME ("NOI")					61.62%	\$6.80	\$6,019	\$1,203,810	\$1,180,878	\$1,139,500	\$1,171,257	\$5,856	\$6.62	59.95%	2.8%	\$ 32,553

CONTROLLABLE EXPENSES							\$2,540/Unit						\$2,704/Unit			
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CAPITALIZATION / TOTAL DEVELOPMENT BUDGET / ITEMIZED BASIS

The Walzem, San Antonio, TDHCA Bonds/4% HTC #20604

DEBT / GRANT SOURCES																			
APPLICANT'S PROPOSED DEBT/GRANT STRUCTURE									Prior Underwriting		AS UNDERWRITTEN DEBT/GRANT STRUCTURE								
DEBT (Must Pay)	Fee	Cumulative DCR		Pmt	Rate	Amort	Term	Principal	Applicant	TDHCA	Principal	Term	Amort	Rate	Pmt	Cumulative			
		UW	App													DCR	LTC		
Cedar Rapids Bank & Trust	0.10%	1.39	1.43	844,597	3.60%	40	16	\$17,890,473	\$15,700,000	\$15,700,000	\$17,890,473	16	40	3.60%	\$862,488	1.40	49.3%		
TDHCA		1.13	1.16	\$191,111	2.50%	30	16	\$4,000,000	\$4,000,000	\$4,000,000	\$3,875,000	16	30	2.50%	\$183,731	1.15	10.7%		
CASH FLOW DEBT / GRANTS																			
				\$1,035,708	TOTAL DEBT / GRANT SOURCES				\$21,890,473	\$19,700,000	\$19,700,000	\$21,765,473	TOTAL DEBT SERVICE				\$1,046,219	1.15	59.9%
NET CASH FLOW		\$135,549	\$168,102											APPLICANT NET OPERATING INCOME	\$1,203,810	\$157,591	NET CASH FLOW		

EQUITY SOURCES															
APPLICANT'S PROPOSED EQUITY STRUCTURE						Prior Underwriting		AS UNDERWRITTEN EQUITY STRUCTURE							
EQUITY / DEFERRED FEES	DESCRIPTION	% Cost	Annual Credit	Credit Price	Amount	Applicant	TDHCA	Amount	Credit Price	Annual Credit	% Cost	Annual Credits per Unit	Allocation Method		
Bank of America	LIHTC Equity	34.9%	\$1,280,892	0.99	\$12,682,810	\$13,199,594	\$13,127,526	\$12,679,550	\$0.99	\$1,280,892	34.9%	\$6,404	Applicant Request		
Cohen-Esrey Development Group	Deferred Developer Fees	5.2%	(46% Deferred)		\$1,906,031	\$3,643,489	\$1,342,780	\$1,874,856		(46% Deferred)	5.2%		Total Developer Fee:		
Additional (Excess) Funds Req'd		0.0%						\$0			0.0%		\$4,104,870		
TOTAL EQUITY SOURCES		40.2%			\$14,588,841	\$16,843,083	\$14,470,306	\$14,554,406			40.1%				
TOTAL CAPITALIZATION					\$36,479,314	\$36,543,083	\$34,170,306	\$36,319,879						15-Yr Cash Flow after Deferred Fee:	\$2,398,424

DEVELOPMENT COST / ITEMIZED BASIS														
APPLICANT COST / BASIS ITEMS				Prior Underwriting		TDHCA COST / BASIS ITEMS				COST VARIANCE				
Eligible Basis	Acquisition	New Const. Rehab	Total Costs	Applicant	TDHCA	Total Costs	Eligible Basis		%	\$				
							New Const. Rehab	Acquisition						
Land Acquisition			\$10,575 / Unit \$2,115,000	\$2,100,000	\$2,100,000	\$2,115,000	\$10,575 / Unit			0.0%	\$0			
Building Acquisition	\$0		\$ / Unit \$0	\$0	\$0	\$0	\$ / Unit	\$0		0.0%	\$0			
Off-Sites		\$92,731	\$464 / Unit \$92,731	\$290,550	\$290,550	\$92,731	\$464 / Unit	\$92,731		0.0%	\$0			
Site Work		\$3,196,050	\$15,980 / Unit \$3,196,050	\$2,912,500	\$2,912,500	\$2,984,119	\$14,921 / Unit	\$2,984,119		7.1%	\$211,931			
Site Amenities		\$1,137,500	\$5,688 / Unit \$1,137,500	\$1,137,500	\$1,137,500	\$1,137,500	\$5,688 / Unit	\$1,137,500		0.0%	\$0			
Building Cost		\$16,348,003	\$92.37 /sf \$81,740/Unit \$16,348,003	\$16,348,003	\$14,647,664	\$17,117,913	\$85.99/sf \$96.72 /sf	\$17,117,913		-4.5%	(\$769,910)			
Contingency		\$1,553,715	7.48% 7.77%	\$1,613,635	\$1,452,500	\$1,493,258	7.00% 7.00%	\$1,493,258		8.1%	\$120,377			
Contractor Fees		\$3,108,081	13.92% 13.88%	\$3,108,350	\$3,108,350	\$2,844,434	13.62% 13.62%	\$3,108,081		0.0%	\$0			
Soft Costs	0	\$820,333	\$4,853 / Unit \$970,500	\$928,500	\$928,500	\$970,500	\$4,853 / Unit	\$820,333	\$0	0.0%	\$0			
Financing	0	\$1,726,744	\$15,770 / Unit \$3,154,033	\$3,524,374	\$3,524,374	\$3,154,033	\$15,770 / Unit	\$1,726,744	\$0	0.0%	\$0			
Developer Fee	\$0	\$4,104,870	14.72% 14.72%	\$4,104,870	\$4,188,472	\$3,896,275	14.41% 14.41%	\$4,104,870	\$0	0.0%	\$0			
Reserves			4 Months \$638,642	\$559,334	\$559,334	\$638,642	4 Months			0.0%	\$0			
TOTAL HOUSING DEVELOPMENT COST (UNADJUSTED BASIS)			\$0	\$32,088,027	\$182,397 / Unit	\$36,479,314	\$36,550,083	\$34,170,306	\$36,916,917	\$184,585 / Unit	\$32,585,549	\$0	-1.2%	(\$437,602)
Acquisition Cost	\$0			\$0	\$0									
Contingency		(\$106,006)		(\$159,435)	(\$4,302)									
Contractor's Fee		\$0		\$0	(\$9,205)									
Financing Cost		\$0												
Developer Fee	\$0	\$0		\$0	\$0									
Reserves				\$0	\$0									
ADJUSTED BASIS / COST			\$0	\$31,982,021	\$181,599/unit	\$36,319,879	\$36,536,577	\$34,170,306	\$36,916,917	\$184,585/unit	\$32,585,549	\$0	-1.6%	(\$597,038)
TOTAL HOUSING DEVELOPMENT COSTS (Applicant's Uses are within 5% of TDHCA Estimate):						\$36,319,879								

CAPITALIZATION / DEVELOPMENT COST BUDGET / ITEMIZED BASIS ITEMS

The Walzem, San Antonio, TDHCA Bonds/4% HTC #20604

CREDIT CALCULATION ON QUALIFIED BASIS				
	Applicant		TDHCA	
	Acquisition	Construction Rehabilitation	Acquisition	Construction Rehabilitation
ADJUSTED BASIS	\$0	\$31,982,021	\$0	\$32,585,549
Deduction of Federal Grants	\$0	\$0	\$0	\$0
TOTAL ELIGIBLE BASIS	\$0	\$31,982,021	\$0	\$32,585,549
High Cost Area Adjustment		130%		130%
TOTAL ADJUSTED BASIS	\$0	\$41,576,627	\$0	\$42,361,214
Applicable Fraction	100.00%	100.00%	100.00%	100.00%
TOTAL QUALIFIED BASIS	\$0	\$41,576,627	\$0	\$42,361,214
Applicable Percentage	3.33%	3.33%	3.33%	3.33%
ANNUAL CREDIT ON BASIS	\$0	\$1,384,502	\$0	\$1,410,628
CREDITS ON QUALIFIED BASIS	\$1,384,502		\$1,410,628	

Method	ANNUAL CREDIT CALCULATION BASED ON APPLICANT BASIS		FINAL ANNUAL LIHTC ALLOCATION		
	Annual Credits	Proceeds	Credit Price \$0.9899	Variance to Request	
			Credit Allocation	Credits	Proceeds
Eligible Basis	\$1,384,502	\$13,705,182	----	---	----
Needed to Fill Gap	\$1,470,291	\$14,554,406	----	---	----
Applicant Request	\$1,280,892	\$12,679,550	\$1,280,892	\$0	\$0

50% Test for Bond Financing for 4% Tax Credits					
Tax-Exempt Bond Amount	\$20,000,000		Percent Financed by Tax-Exempt Bonds	Applicant	TDHCA
Aggregate Basis Limit for 50% Test	\$40,000,000				
	Applicant	TDHCA			
Land Cost	\$2,115,000	\$2,115,000			
Depreciable Bldg Cost	\$28,193,513	\$28,631,116			
Aggregate Basis for 50% Test	\$30,308,513	\$30,746,116			
			amount aggregate basis can increase before 50% test fails	\$9,691,487	\$9,253,884
				32.0%	30.1%

Long-Term Pro Forma

The Walzem, San Antonio, TDHCA Bonds/4% HTC #20604

	Growth Rate	Year 1	Year 2	Year 3	Year 4	Year 5	Year 10	Year 15	Year 20	Year 25	Year 30	Year 35	Year 40
EFFECTIVE GROSS INCOME	2.00%	\$1,953,688	\$1,992,762	\$2,032,617	\$2,073,269	\$2,114,735	\$2,334,838	\$2,577,850	\$2,846,154	\$3,142,384	\$3,469,446	\$3,830,549	\$4,229,235
TOTAL EXPENSES	3.00%	\$749,878	\$771,590	\$793,939	\$816,941	\$840,618	\$969,823	\$1,119,120	\$1,291,658	\$1,491,082	\$1,721,614	\$1,988,139	\$2,296,315
NET OPERATING INCOME ("NOI")		\$1,203,810	\$1,221,171	\$1,238,678	\$1,256,328	\$1,274,117	\$1,365,015	\$1,458,730	\$1,554,497	\$1,651,302	\$1,747,832	\$1,842,410	\$1,932,920
EXPENSE/INCOME RATIO		38.4%	38.7%	39.1%	39.4%	39.8%	41.5%	43.4%	45.4%	47.5%	49.6%	51.9%	54.3%
MUST -PAY DEBT SERVICE													
TOTAL DEBT SERVICE		\$1,046,219	\$1,046,015	\$1,045,804	\$1,045,585	\$1,045,358	\$1,044,091	\$1,042,576	\$1,040,761	\$1,038,590	\$1,035,991	\$1,032,880	\$1,029,157
DEBT COVERAGE RATIO		1.15	1.17	1.18	1.20	1.22	1.31	1.40	1.49	1.59	1.69	1.78	1.88
ANNUAL CASH FLOW													
Deferred Developer Fee Balance		\$157,591	\$175,156	\$192,874	\$210,743	\$228,759	\$320,924	\$416,154	\$513,735	\$612,712	\$711,841	\$809,530	\$903,763
Deferred Developer Fee Balance		\$1,717,265	\$1,542,110	\$1,349,235	\$1,138,492	\$909,733	\$0	\$0	\$0	\$0	\$0	\$0	\$0
CUMULATIVE NET CASH FLOW		\$0	\$0	\$0	\$0	\$0	\$509,213	\$2,398,424	\$4,771,169	\$7,636,443	\$10,997,621	\$14,850,837	\$19,183,032



DEVELOPMENT IDENTIFICATION

TDHCA Application #: 19468 Program(s): 4% HTC/MDL

The Walzem

Address/Location: Northwest of the NWC of FM78 & Walzem Road

City: San Antonio County: Bexar Zip: 78244

Population: General Program Set-Aside: General Area: Urban

Activity: New Construction Building Type: Wrap Style (3 or 4-story) Region: 9

Analysis Purpose: New Application - Initial Underwriting

ALLOCATION

TDHCA Program	REQUEST				RECOMMENDATION				
	Amount	Interest Rate	Amort	Term	Amount	Interest Rate	Amort	Term	Lien
MF Direct Loan Const. to Perm. (Repayable)	\$4,000,000	2.00%	30	40	\$4,000,000	2.50%	30	16	2
LIHTC (4% Credit)	\$1,333,427				\$1,326,147				

* Multifamily Direct Loan Terms:
 * Pursuant to 10 TAC §13.8(a), the term of a Multifamily Direct Loan should match the term of any superior loan (within 6 months).
 * Lien position after conversion to permanent. The Department's lien position during construction may vary.

CONDITIONS

- Receipt and acceptance before Direct Loan Closing
 - a: Substantially final construction contract with Schedule of Values.
 - b: Updated term sheets with substantially final terms from all lenders
 - c: Substantially final draft of limited partnership agreement.
 - d: Senior loan documents (and/or partnership documents) must contain a provision(s) that any stabilization resizing on the senior debt includes the debt service on the TDHCA MDL at a 1.15 DCR.
 - e: Documentation identifying any required matching funds, and confirming that the source is eligible to be counted as matching funds under HUD and TDHCA requirements.
 - f: Receipt and acceptance (no later than 7 business days prior to the Direct Loan Closing) of the third-party cost review used by the construction lender and/or limited partner. The Direct Loan amount will be reduced by the cost difference between the costs concluded by the third-party reviewer and the Applicant's Total Construction Contract indicated by the Applicant on the development cost schedule.

Should any terms of the proposed capital structure change or if there are material changes to the overall development plan or costs, the analysis must be re-evaluated and adjustment to the credit allocation and/or terms of other TDHCA funds may be warranted.

SET-ASIDES

TDHCA SET-ASIDES for HTC LURA		
Income Limit	Rent Limit	Number of Units
60% of AMI	60% of AMI	200

TDHCA SET-ASIDES for DIRECT LOAN LURA		
Income Limit	Rent Limit	Number of Units
50% of AMFI	Low HOME	6
60% of AMFI	High HOME	20

DEVELOPMENT SUMMARY

The development will consist of 200 units with 1, 2 and 3 bedroom units. Rent for eighty-five percent (85%) of the units will be based on 60% AMI. The remaining twenty-five (25) units will have additional rent restrictions based on Tax Credit Assistance Program Repayment Fund (TCAP RF).

RISK PROFILE

STRENGTHS/MITIGATING FACTORS	
<input type="checkbox"/>	Low expense-to-income ratio due to property tax exemption
<input type="checkbox"/>	No new supply of affordable projects years in the area within the last 15 years
<input type="checkbox"/>	Feasibility indicators

WEAKNESSES/RISKS	
<input type="checkbox"/>	Financial feasibility reliant on property tax-exempt status
<input type="checkbox"/>	Individual unit capture rates on one and two bedroom 60% AMI units.
<input type="checkbox"/>	

DEVELOPMENT TEAM

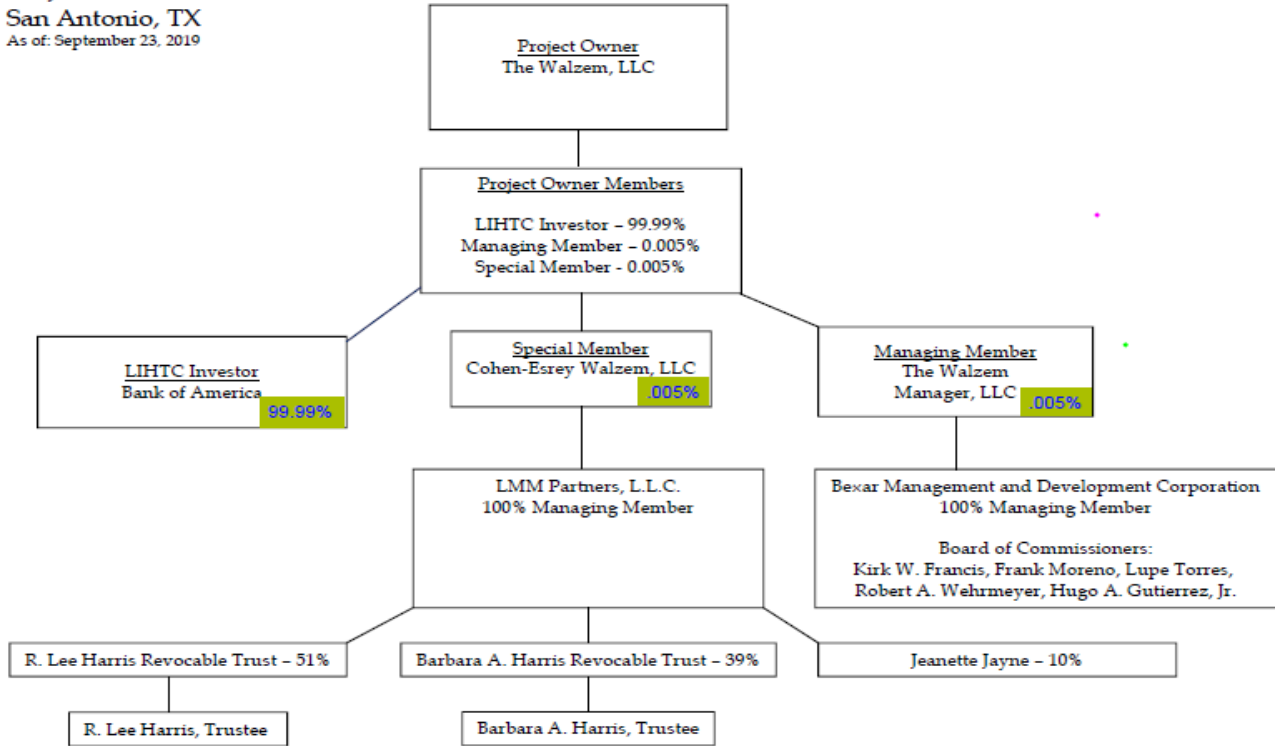
PRIMARY CONTACTS

Name: Jay Johnson
 Phone: (913) 671-3300
 Relationship: Developer

Name: Jon Atlas
 Phone: (913) 671-3300
 Relationship: Developer

OWNERSHIP STRUCTURE

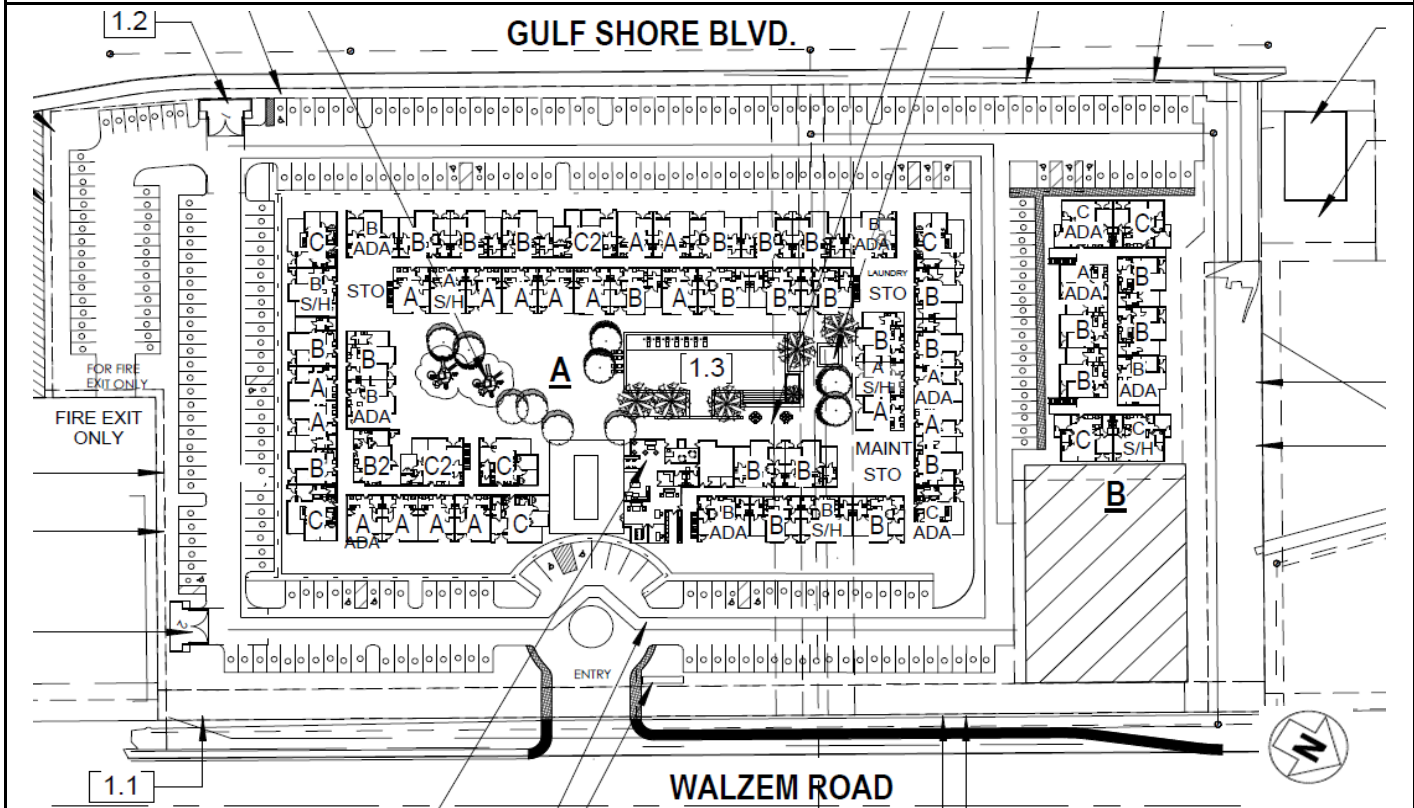
Project: The Walzem
San Antonio, TX
 As of: September 23, 2019



- The Housing Authority of Bexar County acting through the non-profit entity of Bexar Management and Development Corporation (BMDC) will serve as the Managing Member. Cohen-Esrey Development will serve as the Special Limited Partner, Property Manager and Master Subcontractor to the development. Cohen-Esrey have a portfolio of nearly 100 affordable and market rate properties including adaptive reuse projects and use an integrated approach to development including construction management, building supplies, capital, lease-up and property management.

DEVELOPMENT SUMMARY

SITE PLAN



Comments:

Required parking is 301 spaces (1.5/unit) plus an additional 10 handicapped spaces. Seven (7) spaces for the community center are provided for a total of 318 spaces.

BUILDING ELEVATION



Comments:
 Three-stories, exterior cladding is 10% masonry, 90% siding. Roof pitch is 4/12.

BUILDING CONFIGURATION

Building Type	A	B																		Total Buildings	
Floors/Stories	3	3																			2
Number of Bldgs	1	1																			
Units per Bldg	170	30																			
Total Units	170	30																			200
Avg. Unit Size (SF)		905 sf	Total NRA (SF)		180,935	Common Area (SF)		3,161													

SITE AND ACQUISITION

Site Acreage: Development Site: 7.04 acres Density: 28.4 units/acre
Site Control: 7.043 **Site Plan:** 7.043 **Appraisal:** n/a **ESA:** 8

Control Type: Purchase and Sale Agreement Contract Expiration: 1/30/2020

Development Site: 7.04 acres Cost: \$2,080,000 \$10,400 per unit

Seller: Walzem Partners LTD

Buyer: Cohen-Esrey Development Group, LLC

Assignee: Bexar Management and Development Corporation

Related-Party Seller/Identity of Interest: No

Comments:
 Cohen Esrey entered into contract November 2018. Subsequently, Cohen-Esrey reduced the site acreage from 7.95 acres to 7.043. The First Amendment executed in September 2019 reduced the purchase price and extended closing. Property will be conveyed to Bexar Management and Development Corporation. Cohen Esrey will have a 99-year ground lease at \$10 per year.

GENERAL INFORMATION

Flood Zone:	<u> X </u>	Scattered Site?	<u> No </u>
Zoning:	<u> ETJ - N/A </u>	Within 100-yr floodplain?	<u> No </u>
Re-Zoning Required?	<u> No </u>	Utilities at Site?	<u> Yes </u>
Year Constructed:	<u> N/A </u>	Title Issues?	<u> No </u>

Surrounding Uses:

North: Walzem Road, restaurant, vacant field
 South: Gulf Shore Rd, single-family residential
 East: Financial institution, commercial development
 West: Single-family residential, commercial development

Other Observations:

The property is part of the Walzem Partners Business Park Master Development Plan (MDP). The site will need to be replatted to allow multi-family use.

It is anticipated that a Traffic Impact Analysis will need to be done and a deceleration lane will need to be added along Walzem Road. The existing drainage along Walzem Rd will need to be considered in the design of the deceleration land and driveway access.

Subject property has an no-access easement along Gulf Shore Blvd prohibiting driveway access.

HIGHLIGHTS of ENVIRONMENTAL REPORTS

Provider: Tetra Tech, Inc. Date: 8/7/2019

Recognized Environmental Conditions (RECs) and Other Concerns:

- None

Comments:

There is a natural gas pipeline located at the southeast corner of the property, but is not considered a Recognized Environmental Condition (REC).

MARKET ANALYSIS

Provider: Apartment MarketData, LLC Date: 6/5/2019
 Contact: Darrell G. Jack Phone: (210) 530-0040

Primary Market Area (PMA): 26 sq. miles 3 mile equivalent radius

PMA consists of 17 census tracts located in the northeasterly section of San Antonio. Primary roadway include IH-35, FM 78 (Sequin Rd), FM 1976 (Gibbs Sprawl Rd) and Walzem Rd.

ELIGIBLE HOUSEHOLDS BY INCOME								
Bexar County Income Limits								
HH Size		1	2	3	4	5	6	7+
50% AMGI	Min	\$19,950	\$19,950	\$23,940	\$23,940	\$27,690	\$27,690	---
	Max	\$24,850	\$28,400	\$31,950	\$35,500	\$38,350	\$41,200	---
60% AMGI	Min	\$23,940	\$23,940	\$28,740	\$28,740	\$33,210	\$33,210	---
	Max	\$29,820	\$34,080	\$38,340	\$42,600	\$46,020	\$49,440	---

AFFORDABLE HOUSING INVENTORY						
Competitive Supply (Proposed, Under Construction, and Unstabilized)						
File #	Development	In PMA?	Type	Target Population	Comp Units	Total Units
	None					
Other Affordable Developments in PMA since 2015						
Stabilized Affordable Developments in PMA (pre-2015)					Total Units	1,218
					Total Developments	6

OVERALL DEMAND ANALYSIS				
	Market Analyst		Underwriter	
	HTC	Assisted	HTC	Assisted
Total Households in the Primary Market Area	36,419		36,419	
Potential Demand from the Primary Market Area	4,813		4,807	
10% External Demand	481		481	
Potential Demand from Other Sources	0		0	
GROSS DEMAND	5,294		5,287	
Subject Affordable Units	200		200	
Unstabilized Competitive Units	0		0	
RELEVANT SUPPLY	200		200	
Relevant Supply ÷ Gross Demand = GROSS CAPTURE RATE	3.8%		3.8%	

Population:	General	Market Area:	Urban	Maximum Gross Capture Rate:	10%
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UNDERWRITING ANALYSIS of PMA DEMAND by AMGI BAND										
AMGI Band	Market Analyst					Underwriter				
	Demand	10% Ext	Subject Units	Comp Units	AMGI Band Capture Rate	Demand	10% Ext	Subject Units	Comp Units	AMGI Band Capture Rate
50% AMGI	717	72	6	0	0.8%	716	72	6	0	0.8%
60% AMGI	4,096	410	194	0	4.3%	4,091	409	194	0	4.3%

Demand Analysis:

The capture rate calculation determines the percentage of the qualified demand that is needed to absorb the proposed units. All capture rates are well under the maximum thresholds.

UNDERWRITING ANALYSIS of PMA DEMAND by UNIT TYPE										
Unit Type	Market Analyst					Underwriter				
	Demand	10% Ext	Subject Units	Comp Units	Unit Capture Rate	Demand	10% Ext	Subject Units	Comp Units	Unit Capture Rate
1 BR/50%	286	29	2	0	0.6%	348	35	2	0	0.5%
1 BR/60%	477	48	58	0	11.1%	415	41	58	0	12.7%
2 BR/50%	329	33	2	0	0.6%	440	44	3	0	0.6%
2 BR/60%	757	76	98	0	11.8%	475	47	97	0	18.6%
3 BR/50%	235	24	2	0	0.8%	473	47	1	0	0.2%
3 BR/60%	731	73	38	0	4.7%	658	66	39	0	5.4%

Market Analyst Comments:

The level of rent being charged is appropriate and achievable compared to other "affordable" projects in the PMA. (p. 16)

Underwriter Comments:

Affordable properties still monitored in the PMA average 93% occupancy. Individual unit capture rates on the one bedroom and two bedroom 60% AMI units are 12.7% and 18.6%, respectively. Each exceed the 10% Gross Capture rate limit.

Revisions to Market Study:	0
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OPERATING PRO FORMA

SUMMARY- AS UNDERWRITTEN (Applicant's Pro Forma)					
NOI:	\$1,180,878	Avg. Rent:	\$858	Expense Ratio:	38.7%
Debt Service:	\$1,029,382	B/E Rent:	\$790	Controllable Expenses:	\$2,498
Net Cash Flow:	\$151,496	UW Occupancy:	92.5%	Property Taxes/Unit:	\$0
Aggregate DCR:	1.15	B/E Occupancy:	85.2%	Program Rent Year:	2019

Full 50% and 60% rent levels are utilized except for the high-HOME 60%, three bedroom units. No rationale provided for the Project is underwritten with 15 units vacant; breakeven vacancy is 29 units.

Applicant used \$325/unit for repairs and maintenance; Underwriter utilized standard assumption of \$600/unit.

Property is tax-exempt. Without the tax-exemption, DCR would fall to 0.90, below financial feasibility threshold.

Applicant had \$25K in expenses categorized as "compliance". Underwriter recategorized the expense and combined it with General and Administrative expense.

All feasibility indicators (expense ratio and break-evens) are strong except for the DCR at the minimum 1.15 times threshold.

Income, expenses and NOI are all within 5%, so feasibility analysis is based on the Applicant's pro forma. Deferred fee pays off in year 7; 15-year cumulative cash flow is \$2.7M.

Related-Party Property Management Company: Yes

Revisions to Rent Schedule:	4
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Revisions to Annual Operating Expenses:	4
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DEVELOPMENT COST EVALUATION

SUMMARY- AS UNDERWRITTEN (TDHCA's Costs)

Acquisition	\$298,168/ac	\$10,500/unit	\$2,100,000	Contractor Fee	\$2,844,434
Off-site + Site Work		\$21,703/unit	\$4,340,550	Soft Cost + Financing	\$4,452,874
Building Cost	\$80.96/sf	\$73,238/unit	\$14,647,664	Developer Fee	\$3,896,275
Contingency	7.00%	\$6,646/unit	\$1,329,175	Reserves	\$559,334
Total Development Cost	\$170,852/unit	\$34,170,306		Rehabilitation Cost	N/A
Qualified for 30% Basis Boost?		Located in a Small Area Difficult Development Area (SADDA)			

Off-site:

Off Site costs of \$290K are for the construction of a deceleration lane and sidewalks along Walzem Road. Cost includes engineering and architectural fees of \$7K which Underwriter recategorized to Soft Costs for engineering fees.

Site Work:

Certified \$2.9M (\$14,563/unit) for typical site grading, paving, concrete, detention pond, and utility cost. Utility cost includes rerouting the sewer line on-site. The soil has a high plasticity rating and requires additional soil preparation including bringing in additional dirt (12 - 14 cubic yards) and water injection as part of the soil preparation and remediation. Costs include the construction of a deceleration lane for a cost of \$208K. Amenity cost of \$1.1M (\$5,688/unit) is comprised of \$251K for pool and decking, \$255K for athletic courts & playground, plus landscaping and fencing.

Building Cost:

The development consists of a 3-story wrap-style building. Units have 9-ft ceilings and 4/12 roof pitches. Exterior cladding is 10% stone and 90% siding. Underwriter considered Marshall & Swift as a base estimate. Additional considerations in the cost estimate are two TDHCA recently approved projects; Alazan Lofts (#19133) and Luna Flats (#19136). Both project were designed by Munoz Architect, the same architect for this Application. The building cost for Alazan Lofts was \$83.25/ square foot (sq ft) / (\$81,477/unit and Luna Lofts (#19136) at \$85.93/sf (\$82,205/unit). Both projects are being built by NPR is an integrated builder abd has a volume discount in this region. Underwriter factored this discount and made a 10 percent upward adjustment. Underwriter's cost estimate is \$80.96/sf (\$73,238/unit). Applicant's cost is 11.6% higher.

Contingency:

Overstated by \$24K

Contractor Fee:

Overstated by \$12K.

Reserves:

Applicant's cost schedule includes \$559K of total capital reserves. This amount represents approximately 3 months of operating expenses and debt service.

Comments:

Applicant's total development cost is greater than 5% Underwriter's estimate. As a result, the recommended financing structure is based on the Underwriter's cost schedule.

The Total Construction Contract is comprised of Site Work, Site Amenities, Total Building Cost, Contingency and Contractor Overhead and Profit. The Total Construction Contract as submitted by the Applicant is \$25.2M. No later than seven days prior to closing on the Direct Loan, the Applicant must provide a third-party cost review used by the construction lender or the limited partner. The Direct Loan amount will be reduced by the cost difference between the cost concluded by the third-party reviewer and the Applicant's Total Construction Contract amount of \$25.2M as presented on the development cost schedule.

Credit Allocation Supported by Costs:

Total Development Cost	Adjusted Eligible Cost	Credit Allocation Supported by Eligible Basis
\$34,170,306	\$29,827,861	\$1,326,147

Related-Party Contractor: Yes

Related-Party Cost Estimator: Yes

Revisions to Development Cost Schedule:	3
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UNDERWRITTEN CAPITALIZATION

BOND RESERVATION			
Issuer	Amount	Reservation Date	Priority
Bexar County Housing Finance Corp	\$26,000,000	8/15/2019	Priority 3
Closing Deadline	Expected Closing	Bond Structure	
1/12/2020	TBD	Private Placement	

Percent of Cost Financed by Tax-Exempt Bonds	69.2%
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INTERIM SOURCES				
Funding Source	Description	Amount	Rate	LTC
TDHCA	Const. to Perm.	\$4,000,000	2.50%	13%
Bank of America	Tax Ex Bonds	\$19,500,000	5.00%	63%
Bank of America	Conventional Loan	\$6,949,867	5.00%	22%
		\$30,933,963	Total Sources	

Comments:

Bexar County Housing Corporation (BCHC) will issue bonds and Bank of America will buy the bonds and provide construction financing through its 4% Tax Exempt Facility program (4TEF) or Taxable Loan Program. Bank of American to provide construction loan up to \$26,449,867.

PERMANENT SOURCES

Debt Source	PROPOSED				UNDERWRITTEN				
	Amount	Interest Rate	Amort	Term	Amount	Interest Rate	Amort	Term	LTC
Cedar Rapids Bank & Trust	\$15,700,000	4.44%	40	16	\$15,700,000	4.44%	40	16	46%
TDHCA	\$4,000,000	2.50%	30	16	\$4,000,000	2.50%	30	16	12%
Total	\$19,700,000				\$19,700,000				

Comments:

Cedar Rapids Bank & Trust will provide permanent financing at a below market interest rate of 4.44%. Market rate is 4.56%. The Direct Loan of \$4M is funded through the Tax Credit Assistance Program Repayment Fund (TCAP RF) at 2.5% interest, 30-year amortization.

Equity & Deferred Fees	PROPOSED			UNDERWRITTEN			
	Amount	Rate	% Def	Amount	Rate	% TC	% Def
Bank of America	\$13,199,594	\$0.99		\$13,127,526	\$0.99	38%	
Cohen-Esrey Development Group	\$3,643,489		87%	\$1,342,780		4%	34%
Total	\$16,843,083			\$14,470,306			
				\$34,170,306		Total Sources	

Credit Price Sensitivity based on current capital structure	
\$1.085	Maximum Credit Price before the Development is oversourced and allocation is limited
\$0.793	Minimum Credit Price below which the Development would be characterized as infeasible

Revisions to Sources Schedule: 3

CONCLUSIONS

Gap Analysis:	
Total Development Cost	\$34,170,306
Permanent Sources (debt + non-HTC equity)	\$19,700,000
Gap in Permanent Financing	\$14,470,306

Possible Tax Credit Allocations:	Equity Proceeds	Annual Credits
Determined by Eligible Basis	\$13,127,526	\$1,326,147
Needed to Balance Sources & Uses	\$14,470,306	\$1,461,795
Requested by Applicant	\$13,199,594	\$1,333,427

	RECOMMENDATION	
	Equity Proceeds	Annual Credits
Tax Credit Allocation	\$13,127,526	\$1,326,147

	Amount	Interest Rate	Amort	Term	Lien
TDHCA Multifamily Direct Loan	\$4,000,000	3%	30	16	2

Deferred Developer Fee	\$1,342,780	(34% deferred)
Repayable in	7 years	

Comments:

Due to the basis for Total Development Cost being greater than the a variance of 5% , the credit recommendation is \$1,326,147, a reduction of \$7,280 in credits and reduction in net proceeds of \$72,068.

If the Direct Loan funds are not awarded, debt coverage would increase to 1.41. The Underwriter would assume an increase in the primary debt to \$19,200,000. This would require deferral of \$1.8M of the developer fee, which could be repaid within 8 years of operation. There would be no adjustment to the credit recommendation.

Underwriter: Laura Rogers

Manager of Real Estate Analysis: Thomas Cavanagh

Director of Real Estate Analysis: Brent Stewart

UNIT MIX/RENT SCHEDULE
The Walzem, San Antonio, 4% HTC/MDL #19468

LOCATION DATA	
CITY:	San Antonio
COUNTY:	Bexar
Area Median Income	\$71,000
PROGRAM REGION:	9

UNIT DISTRIBUTION								
# Beds	# Units	% Total	Assisted	MDL	Income	# Units	% Total	
Eff	-	0.0%	0	0	20%	-	0.0%	
1	60	30.0%	0	8	30%	-	0.0%	
2	100	50.0%	0	13	40%	-	0.0%	
3	40	20.0%	0	5	50%	-	0.0%	
4	-	0.0%	0	0	60%	200	100.0%	
5	-	0.0%	0	0	70%	-	0.0%	
						80%	-	0.0%
						MR	-	0.0%
TOTAL	200	100.0%	-	26	TOTAL	200	100.0%	

Pro Forma ASSUMPTIONS	
Revenue Growth	2.00%
Expense Growth	3.00%
Basis Adjust	130%
Applicable Fraction	100.00%
APP % Acquisition	3.42%
APP % Construction	3.42%
Average Unit Size	905 sf

UNIT MIX / MONTHLY RENT SCHEDULE																						
HTC		TDHCA Direct Loan Program		UNIT MIX				APPLICABLE PROGRAM RENT			APPLICANT'S PRO FORMA RENTS				TDHCA PRO FORMA RENTS				MARKET RENTS			
Type	Gross Rent	Type	Gross Rent	# Units	# Beds	# Baths	NRA	Gross Rent	Utility Allow	Max Net Program Rent	Delta to Max	Rent psf	Net Rent per Unit	Total Monthly Rent	Total Monthly Rent	Rent per Unit	Rent psf	Delta to Max	Underwritten	Mrkt Analyst		
TC 60%	\$798	LH/50%	\$665	2	1	1	670	\$665	\$63	\$602	\$0	\$0.90	\$602	\$1,204	\$1,204	\$602	\$0.90	\$0	\$898	\$1.34	\$898	
TC 60%	\$798	HH/60%	\$844	6	1	1	670	\$798	\$63	\$735	\$0	\$1.10	\$735	\$4,410	\$4,409	\$735	\$1.10	\$0	\$898	\$1.34	\$898	
TC 60%	\$798			52	1	1	670	\$798	\$63	\$735	\$0	\$1.10	\$735	\$38,220	\$38,210	\$735	\$1.10	\$0	\$898	\$1.34	\$898	
TC 60%	\$958	LH/50%	\$798	2	2	2	940	\$798	\$80	\$718	(\$0)	\$0.76	\$718	\$1,436	\$1,436	\$718	\$0.76	\$0	\$1,149	\$1.22	\$1,149	
TC 60%	\$958	LH/50%	\$798	1	2	2	985	\$798	\$80	\$718	(\$0)	\$0.73	\$718	\$718	\$718	\$718	\$0.73	\$0	\$1,149	\$1.17	\$1,149	
TC 60%	\$958	HH/60%	\$1,017	9	2	2	940	\$958	\$80	\$878	(\$0)	\$0.93	\$878	\$7,902	\$7,904	\$878	\$0.93	\$0	\$1,149	\$1.22	\$1,149	
TC 60%	\$958	HH/60%	\$1,017	1	2	2	985	\$958	\$80	\$878	(\$0)	\$0.89	\$878	\$878	\$878	\$878	\$0.89	\$0	\$1,149	\$1.17	\$1,149	
TC 60%	\$958			86	2	2	940	\$958	\$80	\$878	(\$0)	\$0.93	\$878	\$75,508	\$75,523	\$878	\$0.93	\$0	\$1,149	\$1.22	\$1,149	
TC 60%	\$958			1	2	2	985	\$958	\$80	\$878	(\$0)	\$0.89	\$878	\$878	\$878	\$878	\$0.89	\$0	\$1,149	\$1.17	\$1,149	
TC 60%	\$1,107	LH/50%	\$923	1	3	2	1,165	\$923	\$98	\$825	(\$0)	\$0.71	\$825	\$825	\$825	\$825	\$0.71	\$0	\$1,274	\$1.09	\$1,274	
TC 60%	\$1,107	HH/60%	\$1,166	4	3	2	1,165	\$1,107	\$98	\$1,009	\$59	\$0.92	\$1,068	\$4,272	\$4,036	\$1,009	\$0.87	\$0	\$1,274	\$1.09	\$1,274	
TC 60%	\$1,107			35	3	2	1,165	\$1,107	\$98	\$1,009	(\$0)	\$0.87	\$1,009	\$35,315	\$35,317	\$1,009	\$0.87	\$0	\$1,274	\$1.09	\$1,274	
TOTALS/AVERAGES:				200				180,935				\$1	\$0.95	\$858	\$171,566	\$171,339	\$857	\$0.95	\$0	\$1,099	\$1.21	\$1,099

ANNUAL POTENTIAL GROSS RENT:	\$2,058,792	\$2,056,066
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STABILIZED PRO FORMA

The Walzem, San Antonio, 4% HTC/MDL #19468

STABILIZED FIRST YEAR PRO FORMA

	COMPARABLES		APPLICANT				TDHCA				VARIANCE	
	Database	San Antonio	% EGI	Per SF	Per Unit	Amount	Amount	Per Unit	Per SF	% EGI	%	\$
POTENTIAL GROSS RENT				\$0.95	\$858	\$2,058,792	\$2,056,066	\$857	\$0.95		0.1%	\$2,726
vending, late fee					\$10.00	\$24,000						
0					\$0.00	\$0						
0					\$0.00	\$0						
Total Secondary Income					\$10.00	\$24,000	\$24,000	\$10.00			0.0%	\$0
POTENTIAL GROSS INCOME						\$2,082,792	\$2,080,066				0.1%	\$2,726
Vacancy & Collection Loss					7.5% PGI	(156,209)	(156,005)	7.5% PGI			0.1%	(204)
Rental Concessions						-	-				0.0%	-
EFFECTIVE GROSS INCOME						\$1,926,583	\$1,924,061				0.1%	\$2,522

General & Administrative	\$109,634	\$548/Unit	\$72,307	\$362	3.84%	\$0.41	\$370	\$74,023	\$74,023	\$370	\$0.41	3.85%	0.0%	-
Management	\$118,211	5.0% EGI	\$66,938	\$335	4.11%	\$0.44	\$396	\$79,200	\$76,962	\$385	\$0.43	4.00%	2.9%	2,238
Payroll & Payroll Tax	\$246,252	\$1,231/Unit	\$214,617	\$1,073	11.97%	\$1.27	\$1,153	\$230,632	\$214,617	\$1,073	\$1.19	11.15%	7.5%	16,015
Repairs & Maintenance	\$142,802	\$714/Unit	\$149,202	\$746	3.37%	\$0.36	\$325	\$65,000	\$120,000	\$600	\$0.66	6.24%	-45.8%	(55,000)
Electric/Gas	\$60,466	\$302/Unit	\$28,011	\$140	2.34%	\$0.25	\$225	\$45,000	\$47,074	\$235	\$0.26	2.45%	-4.4%	(2,074)
Water, Sewer, & Trash	\$125,166	\$626/Unit	\$129,700	\$649	4.41%	\$0.47	\$425	\$85,000	\$85,000	\$425	\$0.47	4.42%	0.0%	-
Property Insurance	\$56,922	\$0.31/sf	\$52,237	\$261	4.15%	\$0.44	\$400	\$80,000	\$80,000	\$400	\$0.44	4.16%	0.0%	-
Property Tax (@ 0%) 2.2851	\$120,031	\$600/Unit	\$90,911	\$455	0.00%	\$0.00	\$0	\$0	\$0	\$0	\$0.00	0.00%	0.0%	-
Reserve for Replacements	\$59,494	\$297/Unit	\$66,158	\$331	2.60%	\$0.28	\$250	\$50,000	\$50,000	\$250	\$0.28	2.60%	0.0%	-
Cable TV			-	\$0	0.00%	\$0.00	\$0	\$0	\$0	\$0	\$0.00	0.00%	0.0%	-
Supportive Services			-	\$0	0.93%	\$0.10	\$90	\$18,000	\$18,000	\$90	\$0.10	0.94%	0.0%	-
TDHCA Compliance fees (\$40/HTC unit)			-	\$0	0.42%	\$0.04	\$40	\$8,000	\$8,000	\$40	\$0.04	0.42%	0.0%	-
TDHCA Direct Loan Compliance Fees (\$34/MDL unit)				\$0	0.04%	\$0.00	\$4	\$850	\$884	\$4	\$0.00	0.05%	-3.8%	(34)
TDHCA Bond Compliance Fee			-	\$0	0.00%	\$0.00	\$0	\$0	\$0	\$0	\$0.00	0.00%	0.0%	-
Bond Trustee Fees				\$0	0.52%	\$0.06	\$50	\$10,000	\$10,000	\$50	\$0.06	0.52%	0.0%	-
Security			-	\$0	0.00%	\$0.00	\$0	\$0	\$0	\$0	\$0.00	0.00%	0.0%	-
Compliance			-	\$0	0.00%	\$0.00	\$0	\$0	\$0	\$0	\$0.00	0.00%	0.0%	-
TOTAL EXPENSES					38.71%	\$4.12	\$3,729	\$ 745,705	\$784,561	\$3,923	\$4.34	40.78%	-5.0%	\$ (38,856)
NET OPERATING INCOME ("NOI")					61.29%	\$6.53	\$5,904	\$1,180,878	\$1,139,500	\$5,698	\$6.30	59.22%	3.6%	\$ 41,377

CONTROLLABLE EXPENSES							\$2,498/Unit				\$2,704/Unit			
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CAPITALIZATION / TOTAL DEVELOPMENT BUDGET / ITEMIZED BASIS

The Walzem, San Antonio, 4% HTC/MDL #19468

DEBT / GRANT SOURCES																
APPLICANT'S PROPOSED DEBT/GRANT STRUCTURE										AS UNDERWRITTEN DEBT/GRANT STRUCTURE						
DEBT (Must Pay)	Fee	Cumulative DCR		Pmt	Rate	Amort	Term	Principal	Principal	Term	Amort	Rate	Pmt	Cumulative		
		UW	App											DCR	LTC	
Cedar Rapids Bank & Trust		1.36	1.41	839,724	4.44%	40	16	\$15,700,000	\$15,700,000	16	40	4.44%	\$839,724	1.41	45.9%	
Adjustment to Debt Per §11.302(c)(2)										16	40	4.44%		1.41	0.0%	
TDHCA		1.11	1.15	\$191,111	2.50%	30	16	\$4,000,000	\$4,000,000	16	30	2.50%	\$189,658	1.15	11.7%	
CASH FLOW DEBT / GRANTS																
				\$1,030,835	TOTAL DEBT / GRANT SOURCES			\$19,700,000	\$19,700,000	TOTAL DEBT SERVICE			\$1,029,382	1.15	57.7%	
NET CASH FLOW		\$108,665	\$150,043	APPLICANT NET OPERATING INCOME						\$1,180,878	\$151,496	NET CASH FLOW				

EQUITY SOURCES												
APPLICANT'S PROPOSED EQUITY STRUCTURE						AS UNDERWRITTEN EQUITY STRUCTURE						
EQUITY / DEFERRED FEES	DESCRIPTION	% Cost	Annual Credit	Credit Price	Amount	Amount	Credit Price	Annual Credit	% Cost	Annual Credits per Unit	Allocation Method	
												Bank of America
Cohen-Esrey Development Group	Deferred Developer Fees	10.7%	(87% Deferred)		\$3,643,489	\$1,342,780	(34% Deferred)		3.9%	Total Developer Fee:	\$3,896,275	
Additional (Excess) Funds Req'd		0.0%				\$0			0.0%			
TOTAL EQUITY SOURCES		49.3%			\$16,843,083	\$14,470,306			42.3%			
TOTAL CAPITALIZATION						\$36,543,083	\$34,170,306	15-Yr Cash Flow after Deferred Fee:				\$2,767,781

DEVELOPMENT COST / ITEMIZED BASIS													
APPLICANT COST / BASIS ITEMS						TDHCA COST / BASIS ITEMS						COST VARIANCE	
	Eligible Basis		Total Costs			Total Costs			Eligible Basis		%	\$	
	Acquisition	New Const. Rehab							New Const. Rehab	Acquisition			
Land Acquisition			\$10,500 / Unit	\$2,100,000	\$2,100,000	\$10,500 / Unit					0.0%	\$0	
Building Acquisition	\$0		\$ / Unit	\$0	\$0	\$ / Unit			\$0		0.0%	\$0	
Off-Sites		\$290,550	\$1,453 / Unit	\$290,550	\$290,550	\$1,453 / Unit	\$290,550		\$290,550		0.0%	\$0	
Site Work		\$2,912,500	\$14,563 / Unit	\$2,912,500	\$2,912,500	\$14,563 / Unit	\$2,912,500		\$2,912,500		0.0%	\$0	
Site Amenities		\$1,137,500	\$5,688 / Unit	\$1,137,500	\$1,137,500	\$5,688 / Unit	\$1,137,500		\$1,137,500		0.0%	\$0	
Building Cost		\$16,348,003	\$90.35 /sf	\$81,740/Unit	\$16,348,003	\$14,647,664	\$73,238/Unit	\$80.96 /sf	\$14,647,664		11.6%	\$1,700,339	
Contingency		\$1,452,500	7.02%	7.02%	\$1,452,500	\$1,329,175	7.00%	7.00%	\$1,329,175		9.3%	\$123,325	
Contractor Fees		\$3,108,350	14.04%	14.04%	\$3,108,350	\$2,844,434	14.00%	14.00%	\$2,844,434		9.3%	\$263,916	
Soft Costs	0	\$814,333	\$4,643 / Unit	\$928,500	\$928,500	\$4,643 / Unit	\$814,333		\$0		0.0%	\$0	
Financing	0	\$1,999,012	\$17,622 / Unit	\$3,524,374	\$3,524,374	\$17,622 / Unit	\$1,999,012		\$0		0.0%	\$0	
Developer Fee	\$0	\$4,188,472	14.94%	14.93%	\$4,188,472	\$3,896,275	15.00%	14.83%	\$3,852,693	\$0	7.5%	\$292,197	
Reserves			4 Months	\$559,334	\$559,334	4 Months					0.0%	\$0	
TOTAL HOUSING DEVELOPMENT COST (UNADJUSTED BASIS)		\$0	\$32,251,220	\$182,750 / Unit	\$36,550,083	\$34,170,306	\$170,852 / Unit	\$29,827,861	\$0	7.0%	\$2,379,777		
Acquisition Cost	\$0				\$0								
Contingency			(\$24,640)			(\$4,302)							
Contractor's Fee			(\$12,052)			(\$9,205)							
Financing Cost			\$0			\$0							
Developer Fee	\$0	\$0			\$0								
Reserves					\$0								
ADJUSTED BASIS / COST		\$0	\$32,214,528	\$182,683/unit	\$36,536,577	\$34,170,306	\$170,852/unit	\$29,827,861	\$0	6.9%	\$2,366,271		
TOTAL HOUSING DEVELOPMENT COSTS (Applicant's Uses are not within 5% of TDHCA Estimate):					\$34,170,306.28								

CAPITALIZATION / DEVELOPMENT COST BUDGET / ITEMIZED BASIS ITEMS
The Walzem, San Antonio, 4% HTC/MDL #19468

CREDIT CALCULATION ON QUALIFIED BASIS				
	Applicant		TDHCA	
	Acquisition	Construction Rehabilitation	Acquisition	Construction Rehabilitation
	ADJUSTED BASIS	\$0	\$32,214,528	\$0
Deduction of Federal Grants	\$0	\$0	\$0	\$0
TOTAL ELIGIBLE BASIS	\$0	\$32,214,528	\$0	\$29,827,861
High Cost Area Adjustment		130%		130%
TOTAL ADJUSTED BASIS	\$0	\$41,878,886	\$0	\$38,776,219
Applicable Fraction	100.00%	100.00%	100.00%	100.00%
TOTAL QUALIFIED BASIS	\$0	\$41,878,886	\$0	\$38,776,219
Applicable Percentage	3.42%	3.42%	3.42%	3.42%
ANNUAL CREDIT ON BASIS	\$0	\$1,432,258	\$0	\$1,326,147
CREDITS ON QUALIFIED BASIS	\$1,432,258		\$1,326,147	

Method	ANNUAL CREDIT CALCULATION BASED ON TDHCA BASIS		FINAL ANNUAL LIHTC ALLOCATION		
	Annual Credits	Proceeds	Credit Price \$0.9899	Variance to Request	
			Credit Allocation	Credits	Proceeds
Eligible Basis	\$1,326,147	\$13,127,526	\$1,326,147	(\$7,280)	(\$72,068)
Needed to Fill Gap	\$1,461,795	\$14,470,306	----	----	----
Applicant Request	\$1,333,427	\$13,199,594	----	----	----

50% Test for Bond Financing for 4% Tax Credits					
Tax-Exempt Bond Amount	\$19,500,000		Percent Financed by Tax-Exempt Bonds	Applicant	TDHCA
Aggregate Basis Limit for 50% Test	\$39,000,000				
	Applicant	TDHCA			
Land Cost	\$2,100,000	\$2,100,000			
Depreciable Bldg Cost	\$28,176,915	\$26,089,335			
Aggregate Basis for 50% Test	\$30,276,915	\$28,189,335			
			amount aggregate basis can increase before 50% test fails	28.8%	38.4%

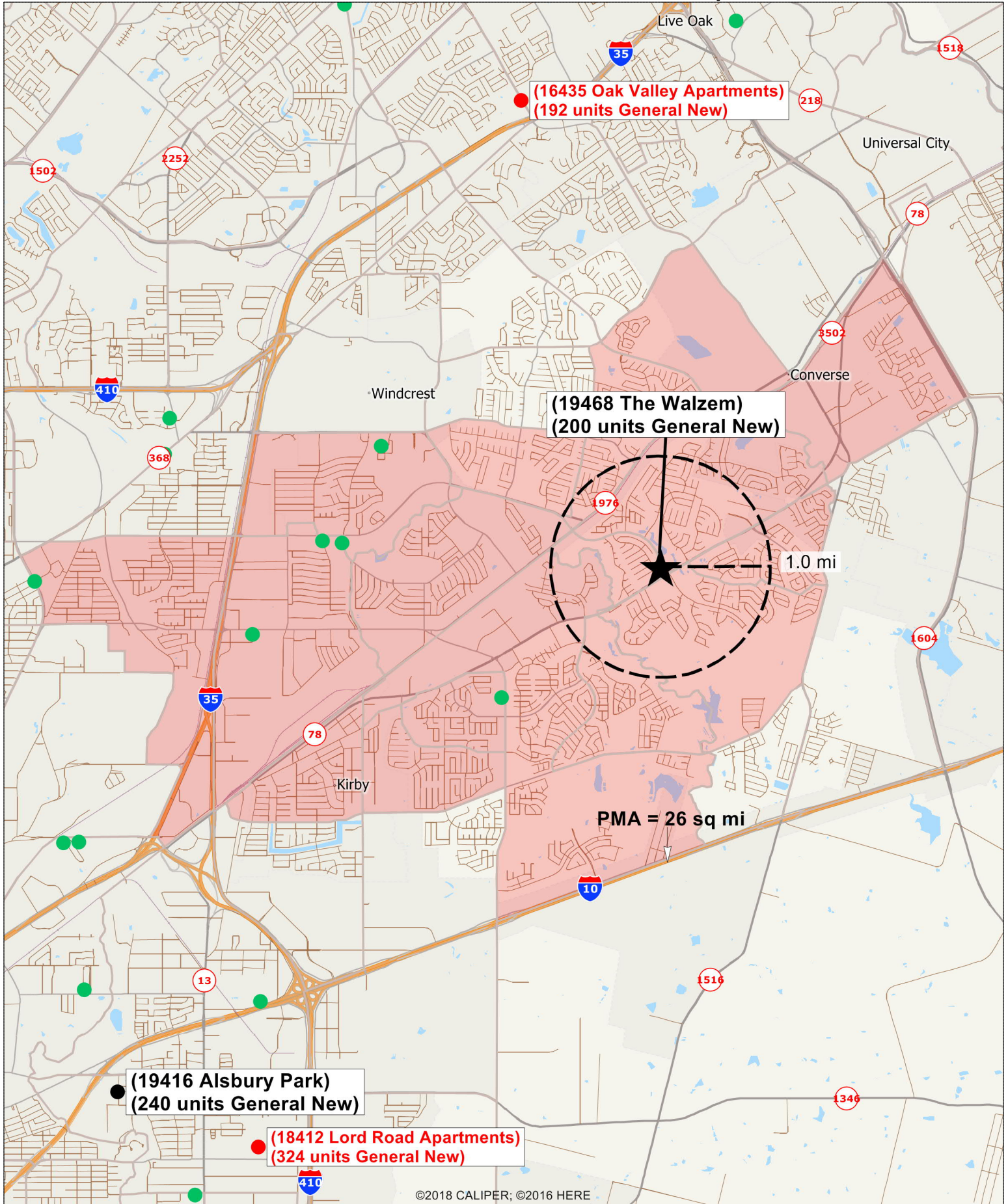
BUILDING COST ESTIMATE				
CATEGORY	FACTOR	UNITS/SF	PER SF	
Base Cost:	Wrap Style (3 or 4-story)	180,935 SF	\$69.57	12,588,222
Adjustments				
Exterior Wall Finish	0.80%		0.56	\$100,706
Elderly	0.00%		0.00	0
9-Ft. Ceilings	3.10%		2.16	390,235
Roof Adjustment(s)			2.86	518,172
Subfloor			(2.47)	(446,060)
Floor Cover			2.56	463,194
Breezeways	\$28.46	26,199	4.12	745,536
Balconies	\$28.35	8,989	1.41	254,801
Plumbing Fixtures	\$1,070	460	2.72	492,200
Rough-ins	\$525	400	1.16	210,000
Built-In Appliances	\$1,780	200	1.97	356,000
Interior Stairs	\$2,280	16	0.20	36,480
Heating/Cooling			2.21	399,866
Storage Space	\$74.47	8,025	3.30	597,622
Carports	\$12.25	0	0.00	0
Garages		0	0.00	0
Common/Support Area	\$91.25	3,161	1.59	288,449
Elevators		0	0.00	0
Other:			0.00	0
Fire Sprinklers	\$2.59	218,320	3.13	565,449
SUBTOTAL			97.06	17,560,872
Current Cost Multiplier	0.99		(0.97)	(175,609)
Local Multiplier	0.90		(9.71)	(1,756,087)
Reserved				0
TOTAL BUILDING COSTS			86.38	\$15,629,176
Plans, specs, survey, bldg permits	3.30%		(2.85)	(\$515,763)
Contractor's OH & Profit	11.50%		(9.93)	(1,797,355)
NET BUILDING COSTS		\$66,580/unit	\$73.60/sf	\$13,316,058

Long-Term Pro Forma

The Walzem, San Antonio, 4% HTC/MDL #19468

	Growth Rate	Year 1	Year 2	Year 3	Year 4	Year 5	Year 10	Year 15	Year 20	Year 25	Year 30	Year 35	Year 40
EFFECTIVE GROSS INCOME	2.00%	\$1,926,583	\$1,965,114	\$2,004,417	\$2,044,505	\$2,085,395	\$2,302,445	\$2,542,085	\$2,806,667	\$3,098,787	\$3,421,311	\$3,777,404	\$4,170,560
TOTAL EXPENSES	3.00%	\$745,705	\$767,284	\$789,495	\$812,356	\$835,886	\$964,289	\$1,112,651	\$1,284,100	\$1,482,256	\$1,711,310	\$1,976,114	\$2,282,287
NET OPERATING INCOME ("NOI")		\$1,180,878	\$1,197,830	\$1,214,922	\$1,232,149	\$1,249,509	\$1,338,155	\$1,429,433	\$1,522,567	\$1,616,532	\$1,710,002	\$1,801,290	\$1,888,272
EXPENSE/INCOME RATIO		38.7%	39.0%	39.4%	39.7%	40.1%	41.9%	43.8%	45.8%	47.8%	50.0%	52.3%	54.7%
MUST -PAY DEBT SERVICE													
TOTAL DEBT SERVICE		\$1,029,382	\$1,029,382	\$1,029,382	\$1,029,382	\$1,029,382	\$1,029,382	\$1,029,382	\$1,029,382	\$1,029,382	\$1,029,382	\$1,029,382	\$1,029,382
DEBT COVERAGE RATIO		1.15	1.16	1.18	1.20	1.21	1.30	1.39	1.48	1.57	1.66	1.75	1.83
ANNUAL CASH FLOW													
ANNUAL CASH FLOW		\$151,496	\$168,448	\$185,540	\$202,767	\$220,127	\$308,774	\$400,052	\$493,185	\$587,150	\$680,620	\$771,908	\$858,891
Deferred Developer Fee Balance		\$1,191,284	\$1,022,836	\$837,296	\$634,529	\$414,401	\$0	\$0	\$0	\$0	\$0	\$0	\$0
CUMULATIVE NET CASH FLOW		\$0	\$0	\$0	\$0	\$0	\$950,993	\$2,767,781	\$5,046,883	\$7,794,611	\$11,011,277	\$14,689,504	\$18,812,203

19468 The Walzem PMA Map



Disclaimer: This map is not a survey. Boundaries, distance and scale are approximate only.

TEXAS DEPARTMENT OF HOUSING & COMMUNITY AFFAIRS

Moderator: Teresa Morales
April 28, 2020
5:53 pm CT

(Teresa Morales): Good afternoon. This is (Teresa Morales) with the Texas Department of Housing and Community Affairs. I'm here to conduct a public hearing for the proposed (Walzem) Apartments project. Just to allow a few more folks to dial in, we'll be starting the public hearing shortly.

Good afternoon, this is (Teresa Morales) with the Texas Department of Housing and Community Affairs and we are going to go ahead and start the public hearing for the proposed (Walzem) Apartments development. Just to give folks an idea of how we're going to proceed, there is a brief introduction that I'm going to give just to give some overview of the application itself and then some specifics on timelines.

After that, there is a speech that I am required to read for IRS purposes and it will be at the conclusion of that speech where if there is anyone on the phone who has specific questions either relating to the department's process with respect to the application or specifics on the development itself, the developer or a member of the development team is available to answer any specific questions that you may have.

To begin, the applicant has applied to the Texas Department of Housing to issue private activity bonds and also to allocate housing tax credits for a 200 unit family development proposed to be new construction and located in San Antonio.

There is a bond reservation associated with this project that was issued on March 12 of 2020 and what that means is the applicant has 180 days to close on that bond financing. That deadline would be September 8 of 2020. All applications must be approved by the TDHCA Board, and this particular application is planned to be presented before the Department's board on May 21st of 2020.

The deadline for any public comments, that would be included in the board package that our board members receive with respect to this project, it would be due by May 8th of 2020. And the individual who you would need to submit that public comment to can be found in the public notice where you obtained information on how to call in for this particular hearing.

So next I'm going to go ahead and read the speech that is required for IRS purposes and at the conclusion of that speech is when I will open up the lines for any individuals who have specific questions as it relates to this particular project.

Good evening, my name is (Teresa Morales) and I would like to proceed with a public hearing. Let the record show that it is 6:06 p.m. Tuesday, April 28th, 2020, and we are conducting a public hearing on behalf of the Texas Department of Housing and Community Affairs with respect to an issue, a tax-exempt multi-family residential bond for a residential rental community. This hearing is required by the Internal Revenue Code.

The sole purpose of this hearing is to provide a reasonable opportunity for interested individuals to express their views regarding the development and the proposed bond issue. No decisions regarding the development will be made at this hearing. The department's board is scheduled to meet to consider the transaction on May 21st, 2020.

In addition to providing your comments at this hearing, the public is also invited to provide comments directly to the board at any of their meetings. The bonds will be issued as tax-exempt multi-family revenue bonds in the aggregate principal amount not to exceed \$20 million and taxable bonds, if necessary, in an amount to be determined and issued in one or more series by the Texas Department of Housing and Community Affairs also known as the issuer.

The proceeds of the Bonds will be loaned to the Walzem Apartments, LLC or a related person or affiliate entity thereof to finance a portion of the cost of acquiring, constructing and equipping a multi-family rental housing community described as follows.

A 200-unit multi-family residential rental development to be constructed on approximately 7.043 acres of land located at 7810 Walzem Road, San Antonio, Bexar County, Texas, 78244. The proposed multi-family rental housing community will be initially owned and operated by the borrower or a related person or affiliate thereof.

I would now like to open the floor for public comment and will unmute the line so that interested individuals can express any comments that they have. I would ask that as you wish to make comment, obviously, we'll have to do just one individual can speak at a time.

When you start if you could please state your name, your full name for the record and then I would ask that the developer maintain a list of any questions that are specific to the project itself and I will maintain a list of any questions that arise as it relates to the department and its process. And once we have all of the individuals who are making public comments out of the way, then we will go ahead and address any questions that came up.

Operator: All participants are now in a direct talk mode.

(Teresa Morales): Do we have any individuals who wish to make any public comment with respect to the Walzem Apartments? I'll ask again if there are any individuals on the line who wish to make a public comment with respect to the Walzem Apartments?

Having asked twice and not heard any individuals who wish to make a public comment with respect to the Walzem Apartments, let the record show that there are no individuals wishing to express public comment and therefore this public hearing is now adjourned and the time is 6:10 p.m.

(Jay): Thank you, (Teresa).

(Teresa Morales): Thank you, (Jay).

(Jay): All right.

Man: Bye.

END

6a

BOARD ACTION REQUEST
SINGLE FAMILY AND HOMELESS PROGRAMS
MAY 21, 2020

Presentation, discussion, and possible action on waivers to certain provisions of Texas Administrative Code for Emergency Solutions Grants Program funds allocated to the State of Texas through the Coronavirus Aid, Relief, and Economic Security Act

RECOMMENDED ACTION

WHEREAS, on March 27, 2020, the Coronavirus Aid, Relief, and Economic Security (CARES) Act was signed into law to provide government support as a result of the novel coronavirus (COVID-19) public health crisis;

WHEREAS, on April 23, 2020, the Board approved a programming plan for the first allocation of Emergency Solutions Grants (ESG) CARES Act funds in the amount of \$33,254,679 for the State of Texas;

WHEREAS, the ESG CARES Act Contracts will incorporate the waivers and flexibilities allowable for ESG as outlined in the CARES Act and granted by HUD; and

WHEREAS, under the authority of 10 TAC §7.1 and for good cause, staff recommends a waiver until September 30, 2022, of 10 TAC §7.3(a-c) and (e)-(f) 10 TAC §7.32(c), and 10 TAC §7.32(i) for funds awarded under the CARES Act allocation, in order to effectuate the flexibilities made available under the CARES Act and the programming plan approved on April 23, 2020;

NOW, therefore, it is hereby

RESOLVED, that the Department has permission to waive 10 TAC §7.3(a-c) and (e-f), 10 TAC §7.32(c) for limited purposes, and 10 TAC §7.32(i), as described herein.

BACKGROUND

On March 27, 2020, the CARES Act was signed into law. The CARES Act provides for \$4 billion to be distributed through the ESG Program nationally, and includes waivers of certain provisions of the ESG regulations. The first allocation of ESG CARES Act funding released by HUD totaled \$1 billion, and allocated \$33,254,679 to the Texas Department of Housing and Community Affairs. The remaining \$3 billion will be distributed by HUD utilizing an allocation formula to be determined at a later date, as approved by the HUD Secretary.

The ESG Program is a HUD-funded program designed to assist people experiencing homelessness or at-risk of homelessness to regain stability in permanent housing quickly after experiencing a housing crisis and/or homelessness. The program components under ESG include street outreach, emergency shelter, rapid re-housing, homelessness prevention, Homeless Management Information System (HMIS), and administration. Rapid re-housing and homelessness prevention may be used for housing relocation and stabilization services and short-term and medium-term rental assistance.

ESG CARES Act funding is available until September 30, 2022. Several changes to ESG regulations are outlined in the CARES Act. The Department is seeking additional ESG waivers from HUD to better serve the needs of Texans that are homeless or at-risk of homelessness, and has identified three provisions in the regulations at 10 TAC Chapter 7, Homeless Program Rules, that may be waived in order to align with the programming plan and in the increased flexibility provided under the Act.

10 TAC §7.3 outlines the applicable requirements for ESG Subrecipients undertaking construction activities, including a requirement to enter into a Land Use Restriction Agreement (LURA) in order to ensure the federally required minimum use period for construction related to emergency shelter, and requirements for construction inspections and building standards. The CARES Act allows for these funds to be utilized to provide temporary emergency shelter, including use of funds for temporary structures and other means, and this use of CARES funds is not subject to the minimum use period. Furthermore, temporary emergency shelters that State or local health officials have determined are necessary to prevent, prepare for, or respond to coronavirus are not required to have environmental or habitability inspections. Staff requests a waiver of 10 TAC §7.3(a)-(c) and (e), having to do with a Land Use Restriction Agreements and construction documents for temporary shelter. Staff requests wavier of 10 TAC §7.3(f) for all provisions of inspection, except the Accessibility Standards for these temporary shelter activities under the CARES Act. The Department will incorporate all the required provisions for temporary shelter activities into its contract with the Subrecipients.

10 TAC §7.32(c) prohibits Subrecipients of ESG funds from subgranting any part of their ESG award. Staff requests that this provision be waived for funds awarded under the CARES Act to align with the programming plan approved on April 23, 2020. This would allow subrecipients of ESG CARES funds to subgrant funds to legal service providers or food service providers to assist ESG clients, and to the HMIS lead entity in their Continuum of Care region in order to manage and operate HMIS systems, including upgrading and enhancing systems to incorporate ESG program data related to COVID-19, to the extent determined that this activity is allowable by HUD.

10 TAC §7.32(i) outlines what can be done with HMIS funding, since the Department is not an HMIS lead agency. TDHCA has requested a waiver from HUD so that TDHCA can expand the provisions of 24 CFR §576.107(a)(2) beyond HMIS lead agencies. This companion waiver would allow the Department's ESG Subrecipients to upgrade, customize and enhance HMIS or comparable databases, and conduct training on using the HMIS software to incorporate ESG program data related to COVID-19.

Staff is requesting that the waivers end on September 30, 2022 (except for the waiver of 10 TAC §7.32(i) which will end on September 30, 2020), unless the CARES Act is amended to extend beyond that date or HUD otherwise extends these waivers. If that happens this action would give staff the ability, but not the mandate to further extend these waivers.

7b

BOARD ACTION REQUEST
MULTIFAMILY FINANCE DIVISION
MAY 21, 2020

Presentation, discussion, and possible action on a Determination Notice for Housing Tax Credits and an Award of Direct Loan Funds (#20400, Palladium at West Francis, Midland)

RECOMMENDED ACTION

WHEREAS, an application for Palladium at West Francis (Applicant), sponsored by the Compass Pointe GP Public Facility Corporation and MCHA Palladium GP, LLC, requesting 4% Housing Tax Credits (HTC) and \$1,259,975 in National Housing Trust Fund (NHTF) under the 4% HTC and Bond Layered set-aside of the 2020-2B Multifamily Direct Loan Notice of Funding Availability (2020-2B NOFA), was submitted to the Department on December 3, 2019;

WHEREAS, the current Certification of Reservation (Reservation) from the Texas Bond Review Board (BRB) was issued on January 6, 2020, and will expire on July 4, 2020;

WHEREAS, the proposed issuer of the bonds is the Midland County Public Finance Corporation;

WHEREAS, in accordance with 10 TAC §1.301(d)(1), the compliance history is designated a Category 2 and deemed acceptable by Executive Award and Review Advisory Committee (EARAC); and

WHEREAS, EARAC recommends \$1,259,975 in NHTF for Palladium at West Francis and the issuance of a Determination Notice.

NOW, therefore, it is hereby

RESOLVED, that the issuance of a Determination Notice of \$1,596,885 in 4% HTC, and \$1,259,975 in NHTF, subject to underwriting conditions that may be applicable as found in the Real Estate Analysis report posted to the Department's website for Palladium at West Francis is hereby approved as presented to this meeting; and

FURTHER RESOLVED, that if the Applicant and the Department have not executed a contract for the NHTF funding by October 2, 2020, the Department may reduce the funding in whole or in part, notwithstanding any other deadline that may appear in the Texas Administrative Code.

BACKGROUND

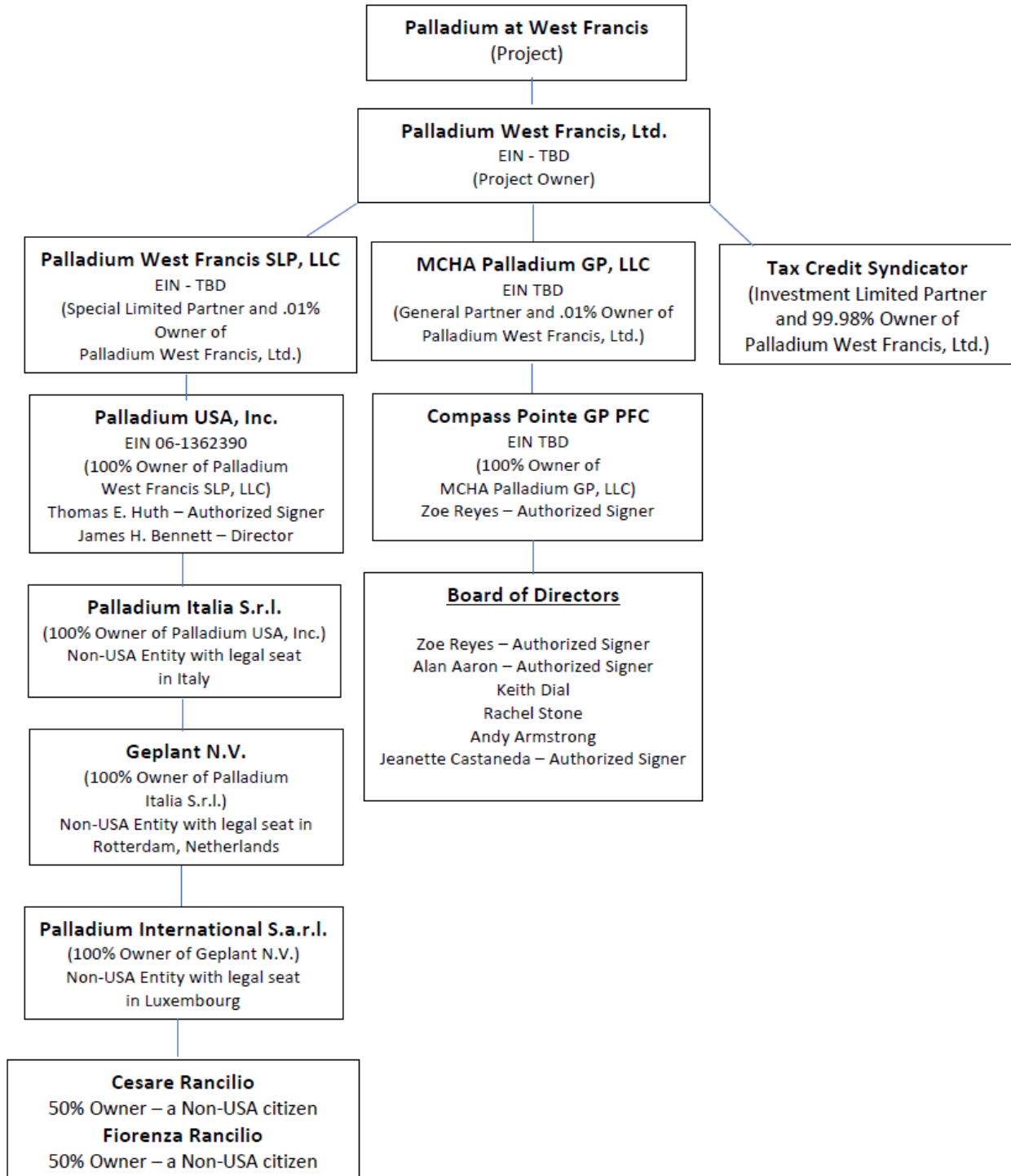
General Information: Palladium at West Francis is a new construction development of 240 units for the general population proposed to be located at 1707 West Francis in Midland, Midland County. The Reservation was issued as part of the BRB Private Activity Bond 2020 Lottery under the Priority 3 designation, which does not have a prescribed restriction on the percentage of Area Median Family Income (AMFI) that must be served. The Applicant has elected to utilize the income averaging set-aside with the income restrictions distributed as follows: 33 units will be rent and income restricted at 40% of AMFI, 11 units will be rent and income restricted at 50% AMFI, 123 units will be rent and income restricted at 60% AMFI, 25 units will be rent and income restricted at 70% AMFI, 25 units will be rent and income restricted at 80% of AMFI, and the remaining 23 units will be leased at market rate.

Moreover, 21 units will be further restricted to households earning the greater of the federal poverty limit or 30% AMFI or less and have rents no higher than the rents for extremely low income households in accordance with 24 CFR §93.302(b) as a result of the NHTF investment. These 21 NHTF units will float throughout the property by Unit Type, but are anticipated to be layered among the 33 40% HTC units for underwriting purposes. This \$1,259,975 NHTF award is anticipated to help the Department meet its federal commitment deadline of October 3, 2020, for Program Year 2018 NHTF. If the Applicant and the Department have not executed a contract for the NHTF funds by October 2, 2020, the Department may reduce the NHTF funds in whole or in part, notwithstanding any other deadline in the Texas Administrative Code. The NHTF loan will be structured as a 0% surplus cash flow loan in accordance with 10 TAC §13.2(14) and 10 TAC §13.8(c)(5) and (6), amortized over a 30 year period with a 40 year term.

Organizational and Site Control Structure: The Borrower/applicant is Palladium West Francis, Ltd. and includes the entities and principals as illustrated in Exhibit A. The applicant's portfolio is considered a Category 2 and the previous participation was deemed acceptable by EARAC. Palladium West Francis, Ltd. will enter into a long-term ground lease with Compass Pointe GP Public Facility Corporation, the sole member of the general partner, upon closing of the financing.

Public Comment: There were no letters of support or opposition received by the Department.

EXHIBIT A



20400 Palladium at West Francis - Application Summary

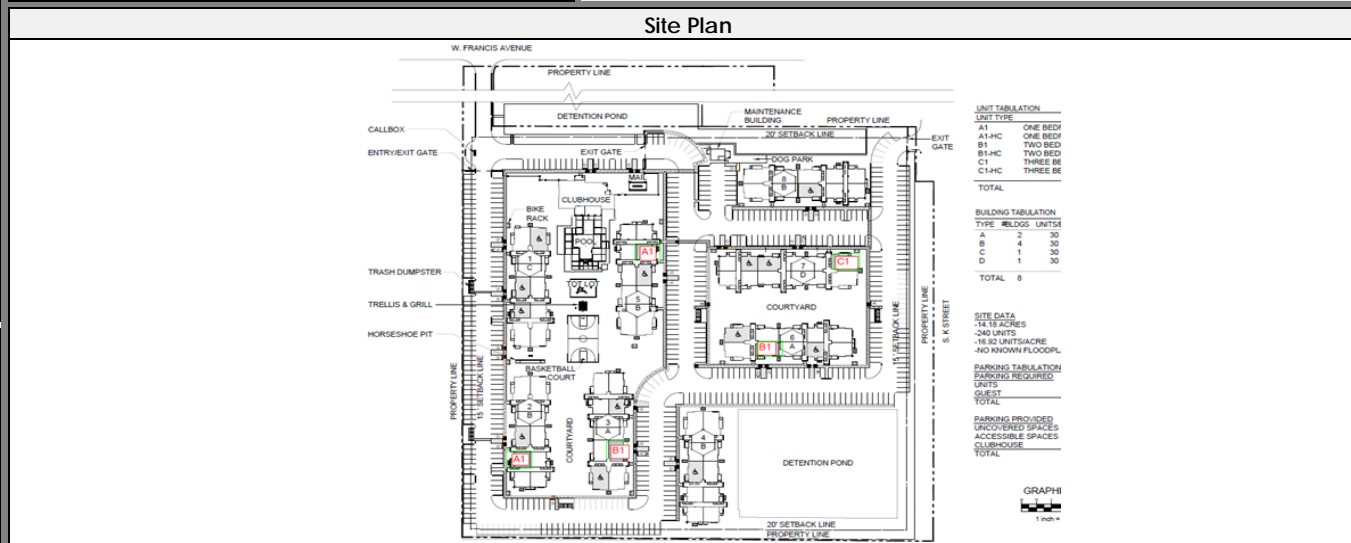
REAL ESTATE ANALYSIS DIVISION

May 18, 2020

PROPERTY IDENTIFICATION	
Application #	20400
Development	Palladium at West Francis
City / County	Midland / Midland
Region/Area	12 / Urban
Population	General
Set-Aside	General
Activity	New Construction

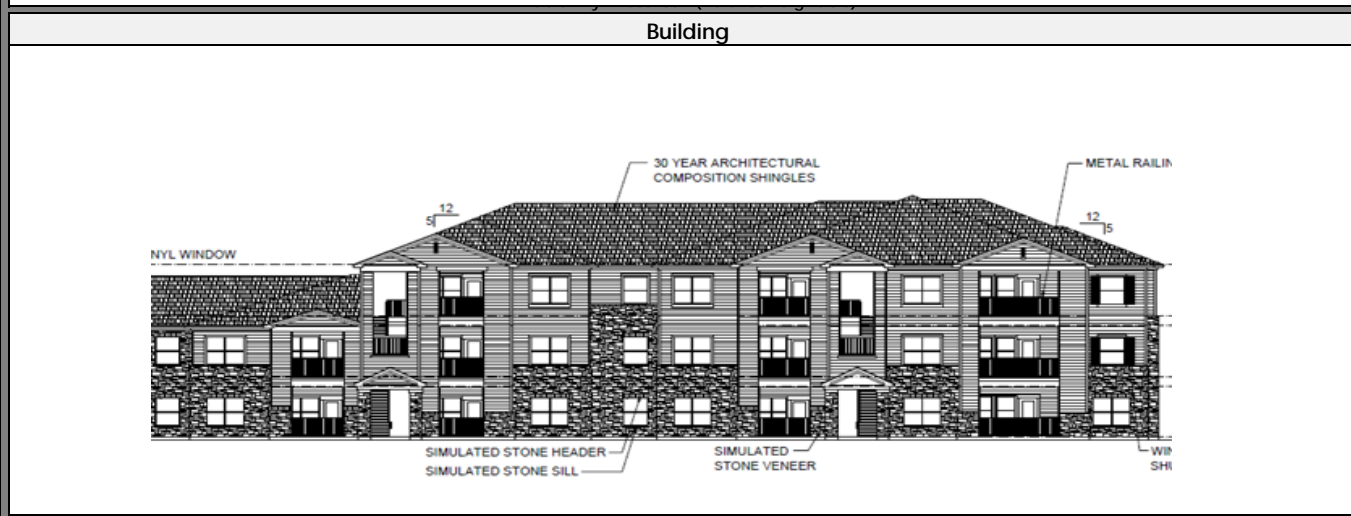
RECOMMENDATION						
TDHCA Program	Request	Recommended				
LIHTC (4% Credit)	\$1,596,885	\$1,596,885	\$6,654/Unit	\$0.91		
Multifamily Direct Loan (Surplus Cash)	\$1,259,975	0.00%	30	40	2	

KEY PRINCIPAL / SPONSOR		
Palladium 80% co-developer/gaurantor/SLP Tom Huth Compass Pointe GP PFC 20% co-developer/GP		
Related Parties	Contractor - No	Seller - No



UNIT DISTRIBUTION			INCOME AVERAGING		
# Beds	# Units	% Total	Income	# Units	% Total
Eff	-	0%	30%	-	0%
1	80	33%	40%	33	14%
2	106	44%	50%	11	5%
3	54	33%	60%	123	51%
			70%	25	10%
			80%	25	10%
			MR	23	10%
TOTAL	240	100%	TOTAL	240	100%

PRO FORMA FEASIBILITY INDICATORS			
Pro Forma Underwritten	TDHCA's Pro Forma		
Debt Coverage	1.15	Expense Ratio	35.5%
Breakeven Occ.	82.3%	Breakeven Rent	\$1,010
Average Rent	\$1,138	B/E Rent Margin	\$128
Property Taxes	Exempt	Exemption/PILOT	100%
Total Expense	\$4,569/unit	Controllable	\$3,235/unit



MARKET FEASIBILITY INDICATORS			
Gross Capture Rate (10% Maximum)	5.3%		
Highest Unit Capture Rate	42%	3 BR/60%	29
Dominant Unit Cap. Rate	32%	2 BR/60%	58
Premiums (↑60% Rents)	Yes	\$319/Avg.	
Rent Assisted Units	N/A		

DEVELOPMENT COST SUMMARY			
Costs Underwritten	Applicant's Costs		
Avg. Unit Size	928 SF	Density	17.5/acre
Acquisition		\$09K/unit	\$2,100K
Building Cost	\$95.27/SF	\$88K/unit	\$21,226K
Hard Cost		\$123K/unit	\$29,518K
Total Cost		\$210K/unit	\$50,322K
Developer Fee	\$5,680K	(47% Deferred)	Paid Year: 7
Contractor Fee	\$3,893K	30% Boost	Yes

DEBT (Must Pay)					CASH FLOW DEBT / GRANT FUNDS					EQUITY / DEFERRED FEES	
Source	Amort/Term	Rate	Amount	DCR	Source	Term	Rate	Amount	DCR	Source	Amount
PNC Bank - 221(d)(4)	40/40	3.70%	\$31,850,000	1.24						PNC Bank	\$14,530,196
TDHCA MDL (75% Surplus Cash)	30/40	0.00%	\$1,259,975	1.15						Palladium/Compass Pointe GP PFC	\$2,681,819
TOTAL DEBT (Must Pay)			\$33,109,975		CASH FLOW DEBT / GRANTS			\$0		TOTAL EQUITY SOURCES	\$17,212,015
										TOTAL DEBT SOURCES	\$33,109,975
										TOTAL CAPITALIZATION	\$50,321,990

CONDITIONS

- 1 Receipt and acceptance before Direct Loan Closing
 - a: Updated application exhibits: Rent Schedule, Utility Allowance, Operating Expenses, Long-Term Pro Forma, Development Cost Schedule, Schedule of Sources; and documentation necessary to support any changes from previous underwriting.
 - b: Substantially final construction contract with Schedule of Values.
 - c: Updated term sheets with substantially final terms from all lenders.
 - d: Substantially final draft of limited partnership agreement.
 - e: Documentation identifying any required matching funds, and confirming that the source is eligible to be counted as matching funds under HUD and TDHCA requirements.
- 2 Receipt and acceptance by Cost Certification:
 - a: Certification from Appraisal District that the property qualifies for property tax exemption.
 - b: Executed ground lease with Compass Pointe GP PFC (CPPFC) clearly specifying all terms and conditions, including who will retain ownership of land and improvements at the end of the lease.
 - c: Attorney opinion validating federally sourced funds can be considered bona fide debt with a reasonable expectation that it will be repaid in full and further stating that the funds should not be deducted from eligible basis.

Should any terms of the proposed capital structure change or if there are material changes to the overall development plan or costs, the analysis must be re-evaluated and adjustment to the credit allocation and/or terms of other TDHCA funds may be warranted.

BOND RESERVATION / ISSUER	
Issuer	Midland County Public Finance Corporation
Expiration Date	7/4/2020
Bond Amount	\$25,000,000
BRB Priority	Priority 3
Bond Structure	FHA 221(d)(4)/Short-Term Cash Collateralized
% Financed with Tax-Exempt Bonds	77.7%

RISK PROFILE	
STRENGTHS/MITIGATING FACTORS	
▫	Tax exemption
▫	Developer experience
▫	High market premiums possible
WEAKNESSES/RISKS	
▫	High concentration of 60% units under construction
▫	Volatile oil industry market
▫	Feasibility relies on high AMI rents



AERIAL PHOTOGRAPH(S)



7c

BOARD ACTION REQUEST
MULTIFAMILY FINANCE DIVISION
MAY 21, 2020

Presentation, discussion and possible action regarding eligibility under 10 TAC §11.101(b)(1)(C) related to Ineligibility of Developments within Certain School Attendance Zones and 10 TAC §11.101(a)(3)(B)(iv) related to Neighborhood Risk Factors for Preserve at the Port (#20468) in San Antonio

RECOMMENDED ACTION

WHEREAS, pursuant to 10 TAC §11.101(b)(1)(C) of the 2020 Qualified Allocation Plan (QAP) any development that falls within the attendance zone of a school that has a 2019 Texas Education Agency (TEA) Accountability Rating of F and a 2018 Improvement Required Rating is ineligible with no opportunity for mitigation;

WHEREAS, an 4% Housing Tax Credit application for Preserve at the Port was submitted to the Department on April 7, 2020, that included a request for a waiver relating to 10 TAC §11.101(b)(1)(C);

WHEREAS, the waiver request disclosed that Winston Elementary School in the attendance zone of the development received such TEA Accountability Ratings;

WHEREAS, there is no provision under the rule by which staff has the discretion to review the information submitted as part of the waiver request in order to find the Preserve at the Port eligible;

WHEREAS, staff does not think the waiver request meets the requirements of 10 TAC §11.207 because the applicant did not describe how the selection of this development was not within its control and does not believe that the granting of a waiver for this development better serves the policies and procedures as outlined in 10 TAC §11.207;

WHEREAS, the applicant disclosed the presence of a Neighborhood Risk Factor under 10 TAC §11.101(a)(3)(B)(iv) relating to the school performance of Brentwood Middle School in the attendance zone of the development; and

WHEREAS, because the decision to waive the ineligibility criteria can only be made by the Board and because such decision is related to a school determined to be substandard by TEA, staff believes the decision to find the site eligible despite the presence of a low-performing middle school under the Neighborhood Risk Factors should also be a Board decision;

NOW, therefore, it is hereby,

RESOLVED, that the Preserve at the Port application is ineligible based on the aforementioned factors and information specific to Winston Elementary, as noted herein; and

FURTHER RESOLVED, staff has deferred to the Board regarding a decision on eligibility of the site based on the low-performing middle school under the Neighborhood Risk Factors.

BACKGROUND

Preserve at the Port is an existing general population development located at 402 Gillmore Avenue, on the southwest side of San Antonio, near Lackland Air Force Base in a census tract with a 34.6 poverty rate. It proposes the rehabilitation of 384 units, all of which will be rent and income restricted for households ranging between 30% of Area Median Family Income (AMFI) and 70% of AMFI. The development was built in 1945 (75 years old) and the application reflects that all 384 units are at market rate with no restrictions. Moreover, the application indicated that as of January 6, 2020, the property was only 38.6% occupied (150 units), with 234 units vacant.

The proposed development is located within the Edgewood Independent School District, a district with an overall rating of C according to the 2019 TEA Accountability Ratings. Specifically, the development is in the attendance zone of Winston Elementary School (Winston), which received a 2019 TEA Accountability Rating of F and a 2018 Improvement Required rating. In reviewing the TEA Accountability reports for 2015, 2016, and 2017, Winston achieved a Met Standard rating for these years.

10 TAC §11.101(b)(1)(C) reads as follows:

“(C) Ineligibility of Developments within Certain School Attendance Zones. Any Development that falls within the attendance zone of a school that has a 2019 TEA Accountability Rating of F and a 2018 Improvement Required Rating is ineligible with no opportunity for mitigation. Developments that are encumbered by a TDHCA LURA on the first day of the Application Acceptance Period or at the time of Pre-application (if applicable), an Elderly Development, or a Supportive Housing SRO Development or Supportive Housing Development where all Units are Efficiency Units are exempt.”

Although Preserve at the Port is an existing development, it is not encumbered by a TDHCA LURA nor does it meet any of the other criteria in the rule that would allow it to be considered eligible despite the school rating. Included in this Board item is information provided by the applicant relating to the improvement plans in place and measures being taken to improve the performance relating to Winston. Because the rule specifically states that such developments are ineligible, there is no framework by which staff could review the information submitted and arrive at a recommendation other than a recommendation of ineligibility.

The applicant disclosed pursuant to 10 TAC §11.101(a)(3)(B)(iv), the performance of Brentwood Middle School (Brentwood) in the attendance zone, specifically, that it received a 2019 TEA Accountability rating of F, and a 2018 Met Standard rating. Prior to this, in 2017 and 2016 Brentwood received a Met Standard rating and an Improvement Required rating in 2015. Staff notes that the high school for the attendance zone, John F. Kennedy High School, received a 2019 TEA Accountability Rating of C and a 2018 Met Standard Rating. Students in this attendance zone would be attending overall, low-performing schools.

While mitigation was submitted for Brentwood that could be evaluated under the rule staff believes that because the bigger issue relates to ineligibility of the elementary school in the attendance zone, the decision to find the site eligible under the Neighborhood Risk Factors as it relates to the middle school should also be a Board decision.

The Department believes that this application has not demonstrated how it meets the factors to be granted a waiver under 10 TAC §11.207. 10 TAC §11.207(1) requires that the applicant demonstrate how the factor is beyond the control of the applicant. When asked by staff to provide clarification on this factor of the waiver rule the applicant stated:

“The narrative provides information about the changes occurring in the school district, as the district is open-boundary (no school zoning) and allows children to attend any of the district’s schools with transportation provided by the school district. This discussion includes information on the historical issues that have been present in the district, and the new superintendent’s vision and strategy for improving academic performance, and the progress the district as a whole has made since implementing the plan. The district’s overall rating increased from a D in 2018 to a C in 2019.

- *The narrative also discussed the campus improvement plans specific to the schools nearest the Development Site and the district’s plans to turn the elementary school into a STEAM academy through its Call for Schools.*
- *Lastly, the narrative highlights how the proposed Development itself will contribute to better educational outcomes. While we can’t change the location of the existing property’s location within Edgewood ISD and proximity to Winston Elementary, we can bring much needed safe, quality housing to the community and provide on-site programming that contributes to the ability of students to perform better at school. As a rehab project, we can enhance the lives of the project’s current residents by providing a more safe, stable, and supportive living environment for the children that call this project home. We also discuss how the planned Development will offer more than just high-quality housing units to affect positive change in the academic performance of students. The multi-functional learning center and resident supportive services planned for the Development (including afterschool programs) will help students perform better in the classroom by taking a holistic approach to the issues that underlie poor academic performance in the classroom.”*

This response does not address how the selection of this site is beyond the control of the applicant. Moreover, 10 TAC 11.207(2) requires the applicant’s waiver request to establish how by granting the waiver request it better serves the policies and purposes of Tex. Gov’t Code, §§2306.001, 2306.002, 2306.359, and 2306.6701, than not granting the waiver. In response, the applicant stated, “In the conclusion of the narrative, we outline the ways in which the granting of a waiver would better serve the policies and purposes of this rule. To summarize, such approval would:

- Produce the greatest number of high-quality units;

- Encourage the development and preservation of appropriate types of rental housing for households that have difficulty finding suitable, affordable rental housing in the private marketplace;
- Maximize the number of suitable, affordable residential rental units added to the state's housing supply by rehabilitating structures on the site that are currently vacant and unlivable;
- Prevent losses for any reason to the state's supply of suitable, affordable residential rental units by enabling the rehabilitation of rental housing or by providing other preventive financial support; and
- Provide for the participation of for-profit organizations and provide for and encourage the participation of non-profit organizations in the acquisition, development, and operation of affordable housing developments in urban and rural communities."

As previously noted, the full tax credit application was submitted, despite the fact that under the rule the site is ineligible. As a result, staff has not performed a review of the application pending a decision with respect to the ineligibility of the application under 10 TAC §11.101(b)(1)(C). Upon a cursory review of the application in order to present this agenda item, staff noted several items of concern, some of which could cause ineligibility under different sections of the Texas Administrative Code or under Chapter 2306 of the Texas Government Code. While these eligibility determinations are not before the Board today, staff thought it was important for the Board to be aware of these areas of concern when determining whether granting the waiver would better serve the purposes of the policies and procedures articulated in 10 TAC §11.207(2).

First, staff notes the applicant stated that the Department's accessibility requirements do not apply to the Development and indicates that this is because of language in the Texas Architectural Barriers Act. Pursuant to 10 TAC §11.101(b)(8)(A) all Developments must comply with the Department's accessibility requirements. Moreover, 10 TAC §11.101(b)(8)(D) requires that all Development's will be treated as substantial alteration for the purposes of Section 504 of the Rehabilitation Act of 1973, which tax credit developments in Texas are required to follow because of Section 2306.6722 of the Texas Government Code. The application did not include any accessible units that would meet the requirement that 5% of the units be accessible to those individuals with physical impairments and another 2% be made accessible for those individuals with hearing and visual impairments. Moreover, an accessible path was not identified that would link the accessible units to the common amenities across the property. Furthermore, while the applicant is correct that units in buildings designed and constructed for first occupancy before March 13, 1991, are exempt from the Fair Housing Design and Construction Standards as outlined in the Fair Housing Design Manual, there is an exception for this exemption if there is new construction behind an old façade. The Scope and Cost Review (SCR) report indicates that this might be the case for some of the buildings that are currently unoccupied as they have been partially demolished. If this occurs, the clubhouse would also need to be made accessible in accordance with the Fair Housing Design Manual.

Given that the Department's accessibility requirements have not been factored into the application, staff questions the extent to which the costs reflected therein are accurate or if they are grossly understated. Moreover, the rules require a SCR report be submitted which is completed by an independent third party

to verify that the costs identified by the applicant for the rehabilitation are accurate. Upon a preliminary review of this report, staff has determined that it is materially deficient as the exhibits referenced therein are not included in the report, including an opinion of costs. The SCR also noted that with respect to accessibility, “no measurements of any type were taken” and “a comprehensive ADA survey was not performed.” The SCR goes on to state that whether any items of non-conformance would be readily achievable is recommended to be determined by the building owner in consultation with its accountants, attorneys and design/construction professionals and further recommends that a comprehensive ADA survey, which will include measurements be performed.

A preliminary review of the Environmental Site Assessment (ESA) noted that the site is a moderate environmental risk due to two adjoining dry cleaners circa-1964 and circa-1983, both of which present a possible EPA Vapor Intrusion risk. The ESA provider noted that this would require vapor screening and underground boring/well study in order to clear the entire site and there is nothing to suggest these additional tests were performed and any costs associated with remediation (if any) have been factored into the development. Also worth noting is the presence of asbestos containing materials in the interior apartment units, exteriors of the apartments, office and laundry buildings, along with the interior laundry building.

It is based on the aforementioned factors, that staff believes the applicant’s response to the second part of the waiver provision under 10 TAC 11.207(2), that the request establish how by granting the waiver request it better serves the policies and purposes of Tex. Gov't Code, §§2306.001, 2306.002, 2306.359, and 2306.6701, than not granting the waiver, has not been met.

Included herein is information provided by the applicant that would serve as the basis for the Board’s review regarding eligibility (Exhibit A). Letters of support are also included from Superintendent of Schools Dr. Eduardo Hernandez, State Senator Jose Menendez, and the Thompson Neighborhood Association (Exhibit B).

Exhibit A

From: hollythoman@gmail.com
To: [Teresa Morales](#)
Cc: valerykedroff@gmail.com
Subject: RE: Eligibility for Waiver Request
Date: Wednesday, May 13, 2020 4:12:51 PM
Attachments: [Preserve at the Port Waiver-Narrative FINAL.pdf](#)

Hi Teresa,

Happy Wednesday! I hope you are well! The requirements of §11.207 are discussed in the narrative of the waiver request that was submitted on 4/6. I have attached the narrative portion of the waiver request herein for ease of reference. I've also briefly summarized how this narrative addresses these requirements below in red.

§11.207

An Applicant may request a waiver in writing at or prior to the submission of pre-application (if applicable) or the Application subsequent to award... Where appropriate, the Applicant must submit with the requested waiver any plans for mitigation or alternative solutions. Any such request for waiver must be specific to the unique facts and circumstances of an actual proposed Development... All waiver requests must meet the requirements of paragraphs (1) and (2) of this subsection. **The narrative discusses the mitigating/alternative solutions that apply to the school district and the underperforming school that has made the development's eligibility subject to the waiver request, as well as the design/programming elements of the development plan that support our request.**

1. A waiver request made at or prior to pre-application or Application must establish that the need for a waiver is not within the control of the Applicant... A recommendation for a waiver may be subject to the Applicant's provision of alternative design elements or amenities of a similar nature or that serve a similar purpose...
 - **The narrative provides information about the changes occurring in the school district, as the district is open-boundary (no school zoning) and allows children to attend any of the district's schools with transportation provided by the school district. This discussion includes information on the historical issues that have been present in the district, and the new superintendent's vision and strategy for improving academic performance, and the progress the district as a whole has made since implementing the plan. The district's overall rating increased from a D in 2018 to a C in 2019.**
 - **The narrative also discussed the campus improvement plans specific to the schools nearest the Development Site and the district's plans to turn the elementary school into a STEAM academy through its Call for Schools.**
 - **Lastly, the narrative highlights how the proposed Development itself will contribute to better educational outcomes. While we can't change the location of the existing property's location within Edgewood ISD and proximity to Winston Elementary, we can bring much needed safe, quality housing to the community and provide on-site programming that contributes to the ability of students to perform better at school. As a rehab project, we can enhance the lives of the project's current residents by providing a more safe, stable, and supportive living environment for the children that call this project home. We also discuss how the planned Development will offer more than just high-quality housing units to affect positive change in the academic performance of students. The multi-functional learning center and resident supportive services planned for the**

Development (including afterschool programs) will help students perform better in the classroom by taking a holistic approach to the issues that underly poor academic performance in the classroom.

2. The waiver request must establish how, by granting the waiver, it better serves the policies and purposes articulated in Tex. Gov't Code, §§2306.001, 2306.002, 2306.359, and 2306.6701, (which are general in nature and apply to the role of the Department and its programs, including the Housing Tax Credit program) than not granting the waiver.
 - In the conclusion of the narrative, we outline the ways in which the granting of a waiver would better serve the policies and purposes of this rule. To summarize, such approval would:
 - Produce the greatest number of high-quality units;
 - Encourage the development and preservation of appropriate types of rental housing for households that have difficulty finding suitable, affordable rental housing in the private marketplace;
 - Maximize the number of suitable, affordable residential rental units added to the state's housing supply by rehabilitating structures on the site that are currently vacant and unlivable;
 - Prevent losses for any reason to the state's supply of suitable, affordable residential rental units by enabling the rehabilitation of rental housing or by providing other preventive financial support; and
 - Provide for the participation of for-profit organizations and provide for and encourage the participation of non-profit organizations in the acquisition, development, and operation of affordable housing developments in urban and rural communities.

Please let us know if there is anything else you need.

Kind regards,
Holly Thoman
hollyhthoman@gmail.com
210.569.9354

From: Teresa Morales <teresa.morales@tdhca.state.tx.us>
Sent: Tuesday, May 12, 2020 5:32 PM
To: hollyhthoman@gmail.com
Cc: valerykedroff@gmail.com
Subject: RE: Eligibility for Waiver Request

Hi Holly,

I may have missed it, but in the information you submitted I didn't see where the waiver is specific to 11.207 of the QAP. Any request for a waiver would have to meet the requirements of 11.207. Can you, please, submit something to me by end of the day tomorrow?

Regards,
Teresa

From: hollythoman@gmail.com <hollythoman@gmail.com>
Sent: Monday, April 27, 2020 6:01 PM
To: Teresa Morales <teresa.morales@tdhca.state.tx.us>
Cc: valerykedroff@gmail.com
Subject: RE: Eligibility for Waiver Request

Whoops! I guess it only helps if I attach the docs. My apologies! Please see the letters included herein.

Kind regards,
Holly Thoman
hollythoman@gmail.com
210.569.9354

From: hollythoman@gmail.com <hollythoman@gmail.com>
Sent: Monday, April 27, 2020 5:00 PM
To: 'Teresa Morales' <teresa.morales@tdhca.state.tx.us>
Cc: valerykedroff@gmail.com
Subject: RE: Eligibility for Waiver Request

Good afternoon Teresa,
I hope your week is off to a good start! Hard to believe it's a Monday – it feels like a Thursday. Please find attached the supplemental documents for our waiver request: letters from the Superintendent of Edgewood ISD, the local neighborhood association, and Sen. Jose Menendez. Shall I upload these as a combined PDF to the FTP, as well?

Kind regards,
Holly Thoman
hollythoman@gmail.com
210.569.9354

From: hollythoman@gmail.com <hollythoman@gmail.com>
Sent: Wednesday, April 15, 2020 1:37 PM
To: 'Teresa Morales' <teresa.morales@tdhca.state.tx.us>
Cc: valerykedroff@gmail.com
Subject: RE: Eligibility for Waiver Request

Thanks, Teresa! We will make sure to have any supplemental information packaged and submitted by no later than the 27th.

Kind regards,
Holly Thoman
hollyhthoman@gmail.com
210.569.9354

From: Teresa Morales <teresa.morales@tdhca.state.tx.us>
Sent: Tuesday, April 14, 2020 3:01 PM
To: hollyhthoman@gmail.com
Cc: valerykedroff@gmail.com
Subject: RE: Eligibility for Waiver Request

If you could get me everything no later than April 27th, that would work.

From: hollyhthoman@gmail.com <hollyhthoman@gmail.com>
Sent: Thursday, April 9, 2020 12:29 PM
To: Teresa Morales <teresa.morales@tdhca.state.tx.us>
Cc: valerykedroff@gmail.com
Subject: RE: Eligibility for Waiver Request

Gotcha- thanks! One last question - could you kindly confirm the deadline to submit any supplemental information regarding the waiver request for the May board meeting?

Kind regards,
Holly Thoman
hollyhthoman@gmail.com
210.569.9354

From: Teresa Morales <teresa.morales@tdhca.state.tx.us>
Sent: Thursday, April 9, 2020 12:23 PM
To: hollyhthoman@gmail.com
Subject: RE: Eligibility for Waiver Request

You can submit the supplemental info and I'll add it to the request. We are posting the Board book for the April meeting next week so there's no way we can get this to April.

From: hollyhthoman@gmail.com <hollyhthoman@gmail.com>
Sent: Thursday, April 9, 2020 11:51 AM
To: Teresa Morales <teresa.morales@tdhca.state.tx.us>
Subject: RE: Eligibility for Waiver Request
Importance: High

Thank you, Teresa. We submitted the waiver request on Monday, along with the application, though

we understand that the waiver request would have to be approved before review of the application will begin. Will the waiver request be on this month's board meeting? Since submittal, I have received a letter from the school district's superintendent. Am I able to submit this to supplement the waiver request that was submitted?

Kind regards,
Holly Thoman
hollyhthoman@gmail.com
210.569.9354

From: Teresa Morales <teresa.morales@tdhca.state.tx.us>
Sent: Monday, April 6, 2020 8:08 AM
To: hollyhthoman@gmail.com
Cc: valerykedroff@gmail.com
Subject: RE: Eligibility for Waiver Request

If this is in connection with an application to be filed then we'll have to take the waiver separate from any award. If under the rule the application is ineligible then we can't proceed with the review of an ineligible application.

From: hollyhthoman@gmail.com <hollyhthoman@gmail.com>
Sent: Sunday, April 5, 2020 11:45 AM
To: Teresa Morales <teresa.morales@tdhca.state.tx.us>
Cc: valerykedroff@gmail.com
Subject: RE: Eligibility for Waiver Request

Thank you very much, Teresa. From your email, it sounds like we may have a little time to finish putting together our waiver request. If so, that would be incredibly helpful since we've been having difficulty getting in touch with the school district – what with everything being shutdown due to the pandemic and all. We're aiming to submit the application on Monday, but the waiver request would be much less informative versus what the waiver request would look like after getting in touch with the school district. We think we may be able to finally reach the district this week.

Kind regards,
Holly Thoman
hollyhthoman@gmail.com
210.569.9354

From: Teresa Morales <teresa.morales@tdhca.state.tx.us>
Sent: Sunday, April 5, 2020 10:21 AM
To: hollyhthoman@gmail.com
Subject: FW: Eligibility for Waiver Request

Hi Holly,

Circling back to this. You could request a waiver from the Board relating to the ineligibility of the development. The QAP does not address the kind of information that could be submitted that staff would review in order to arrive at a recommendation for the Board. That being said, it would likely be something that is presented to the Board absent a staff recommendation.

You would need to submit the waiver request and any information you wanted the Board to consider in sufficient time for staff to review prior to the anticipated Board meeting. This information would be provided in the Board materials. Keep in mind that you cannot provide new information at the Board meeting so whatever you wanted them to consider would have to be included in their materials that we post in advance of the meeting.

Regards,
Teresa

From: Holly Thoman <hollyhthoman@gmail.com>
Sent: Tuesday, March 31, 2020 11:43 AM
To: Teresa Morales <teresa.morales@tdhca.state.tx.us>
Subject: Re: Eligibility for Waiver Request

Good afternoon Teresa,
No, the property is not currently encumbered by a LURA through TDHCA,

Kind regards,
Holly Thoman
hollyhthoman@gmail.com
210.569.9354

On Tue, Mar 31, 2020 at 11:20 AM Teresa Morales <teresa.morales@tdhca.state.tx.us> wrote:

Hi Holly,

You mention that it's a rehab – is the property currently encumbered by a LURA through the Department?

Thanks,
Teresa

From: hollyhthoman@gmail.com <hollyhthoman@gmail.com>
Sent: Tuesday, March 24, 2020 2:58 PM
To: Teresa Morales <teresa.morales@tdhca.state.tx.us>
Cc: 'Valery Kedroff' <valerykedroff@gmail.com>
Subject: Eligibility for Waiver Request

Good afternoon Teresa,

I hope you and yours are faring well through the pandemic. We are reviewing a project that is being considered for submittal for 4% housing tax credits and came across something that we were hoping you could provide clarification on. The proposed rehab project is located in the attendance zone of an elementary school that received a “F” 2019 TEA Accountability Rating and an “IR” 2018 Rating. Per §11.101(b)(1)(C) of the QAP, “Any Development that falls within the attendance zone of a school that has a 2019 TEA Accountability Rating of F and a 2018 Improvement Required Rating is ineligible with no opportunity for mitigation.”

The question we have is whether or not this language would preclude a waiver request? The elementary school in question is the one closest to the project site. However, this school district is an open-boundary district, which allows students and parents to choose which schools the students will attend. Each family has the opportunity to choose from all of the district’s schools and programs designed to best fit the individual needs and interests of their child. The school district was also designated as a District of Innovation at the end of 2017. The term of the Innovation Plan is five years and started in 2018 and is aimed at introducing new education models into a school system that has remained largely unchanged in the last several decades. Since adoption of the new plan, the school district as a whole has improved its overall rating from a “D” in 2018 to a “C” in 2019.

Pending your thoughts on eligibility, a subsequent waiver request will detail the changes and improvements being implemented. We believe a waiver would allow us to provide a rehabilitation project that would create a safer and more stable living environment for the community’s families.

Kind regards,
Holly Thoman
hollythoman@gmail.com
210.569.9354

Waiver Request – School Attendance Zones

The proposed Development, known as Preserve at the Port, is currently occupied and located at 402 Gillmore Avenue in San Antonio, Texas. This rehabilitation development will fully renovate and refurbish the property's existing 384-units; one-hundred percent (100%) of the Development's units will be rent and income restricted for households with incomes between thirty percent (30%) and seventy percent (70%) of the Area Median Income (AMI).

The Development Site is located within Edgewood ISD, which is an open-boundary school district. The Schools closest to the development are Winston Elementary, Brentwood Middle School and John F. Kennedy High school. Winston Elementary received an 'F' rating in 2019 and an Improvement Required rating in 2018, causing the Development to be initially classified as ineligible. Brentwood Middle School also received an 'F' in 2019 but received a Met Standard rating in 2018; therefore, the school's performance falls under the Neighborhood Risk factors requirements for disclosure and mitigation. We are seeking a waiver concerning these schools to allow the rehabilitation of 384 existing, dilapidated units located on the West side of San Antonio. The rehabilitation of these units will bring much needed safe, quality housing to the area and provide on-site programming that contributes to the ability of students to perform better at school.

DISTRICT LEADERSHIP

In May 2016, Texas Education Commissioner Mike Morath replaced the Edgewood ISD School Board with an appointed slate of managers. The district's enrollment dropped almost 10% after the state took control of the district in 2016. The TEA appointed a board of managers to replace Edgewood ISD's elected board after in-fighting and scandals left the district without a superintendent for nearly a year. After that, Edgewood ISD had a revolving door of school chiefs and interim superintendents until Eduardo Hernández was appointed as superintendent in June 2018.

In June of 2018, Eduardo Hernández was appointed as superintendent, and has been tasked with implementing the plan which is focused on Innovation and Transformation with the belief that all students can be successful.

At the end of 2017, Edgewood ISD was approved as a District of Innovation to increase local control over the District operations and to support innovation and local initiatives to improve educational outcomes for the benefit of Students and the community. The Plan has a term of five (5) years, beginning in 2018, and is aimed at introducing new education models into a school system that has remained largely unchanged in the last several decades. Since adoption of the new plan, the school district as a whole has improved its overall rating from a "D" in 2018 to a "C" in 2019.

OPEN-BOUNDARY SCHOOLS

In Fall 2019 semester, Edgewood ISD became an open-enrollment school district, which allows students and parent to choose which schools the students will attend. Each family has the opportunity to choose from all of the district's schools and programs designed to best fit the individual needs of their children. All students from Bexar County can apply to an Edgewood ISD School of Innovation. By opening up the

district school to students from across the county and creating high-quality academic programming at its schools, the district aims to draw more students to the district at a time when enrollment has declined due in part to the rapid growth of area charter schools and funding is based on the number of students in class.

VISION 2025

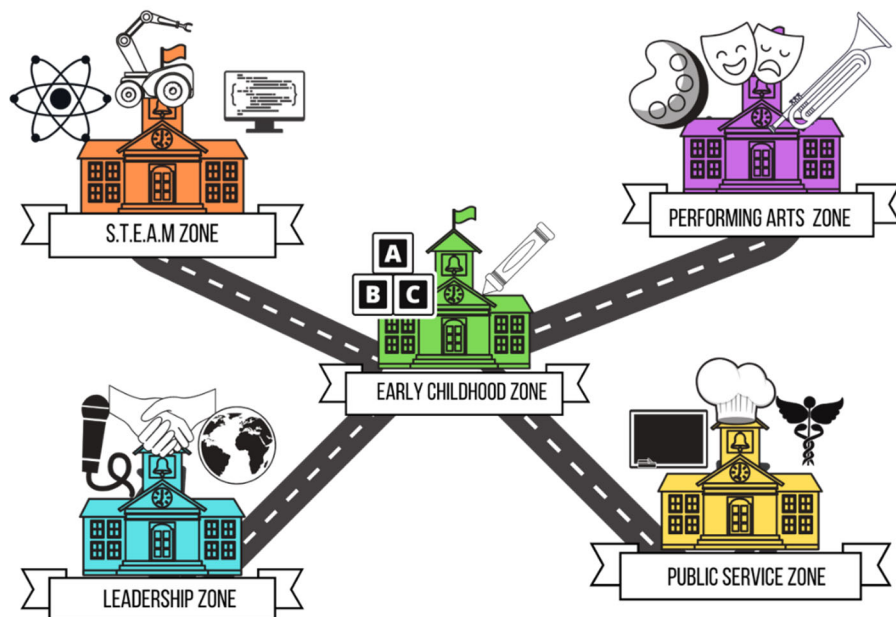
The superintendent and school board have created a list of five goals that drive each decision they make. Vision 2025 is representative of the district's overall approach to implementing such a transformational innovation plan, as outlined later in this report. These goals are:

1. Focus on Student Success
2. Focus on Students, Families, and Community
3. Focus on Operational Excellence
4. Focus on Employee and Organizational Improvement
5. Focus on Financial Stewardship

These key principles create the framework upon which the district's bold plans are built.

SCHOOLS OF INNOVATION

Edgewood ISD is relentlessly committed to providing students with a next-level education that best fits their diverse skills. In 2019, Superintendent Eduardo Hernández introduced a plan to convert many of the district's neighborhood campuses into specialty schools over the next five (5) years. The new plan will break the district's school system down into five innovation zones. The zones will be focused on five different program models: early childhood learning, S.T.E.A.M. (Science, Technology, Engineering, Arts, and Mathematics), public service, single-gender leadership schools, and fine arts.



Early Childhood Zone: Focused on dual language immersion, HighScope Quality Early Learning model and outdoor learning.

S.T.E.A.M. Zone: New Project Based Learning model focused on STEAM instruction and CTE where students will explore, invent, collaborate, and create as they design solutions to real-world problems and choose their pathway for high school, college, and beyond.

Performing Arts Zone: New Project Based Learning instructional model and design-thinking integration

Leadership Zone: International Baccalaureate Model to support the development of scholars through community building

Public Service Zone: Instructional model focused on human services, social emotional learning, and ESL

Innovation schools are new, start-up, open enrollment schools for students across the entire district, and transportation is provided for families within certain parameters. Innovation Schools seek to offer instructional approaches, content, and themes that are attractive to Edgewood ISD families of all backgrounds and academic abilities, which could lead to more diverse student bodies in these schools

The district's new five-year strategic innovation plan would transform Edgewood ISD's 20 campuses into career-focused high schools, two single-gender K-8 campuses, and new programs focused on S.T.E.A.M. curriculum, performing arts, leadership, early childhood, and public service, all by the end of the 2022-23 school year. As part of Edgewood ISD's process for innovation, the district is giving principals a year away from their campuses to design new curriculums, instruction models, and operational details. They also visit successful school models around the country to learn best practices.

COMMUNITY-BASED APPROACH

Community input is a key part of Edgewood ISD's transformation strategy. District administrators regularly schedule *pláticas* with each campus community to loop them in on the process. These *pláticas*, or community meetings, increase communication and visibility between parents, teachers, students and community, regarding the educational progress, school events and a comprehensive plan that addresses family engagement/resources and social services. The school district is also working to expand partnerships with local businesses and community leaders to build bridges between education and career training to provide scholars with hands on learning experiences and opportunities to earn industry certifications.

CALL FOR SCHOOLS

As part of the district's Vision 2025, Edgewood ISD also has a "call for schools" to enter into SB 1882 Texas Partnerships with local institutions of higher education, nonprofits, or government entities. To expand and increase the number of high-quality Choice Schools in the district, the Office of Transformation and Innovation is requesting proposal from qualified educators and leaders who want to utilize their creative skills and past successes to launch autonomous, district-authorized charter schools.

The district currently has partnership programs with PreK 4 SA and Texas A&M San Antonio to help improve and create better educational programs and learning environments. Edgewood ISD's partnership with Pre-K 4 SA, the city funded preschool program, is in the process of turning Gardendale Elementary School into Gardendale Pre-K 4 SA Early Learning Program that will serve only students from preschool to second grade. In January 2020, the Edgewood ISD School Board voted to approve two SB 1882 partnerships with Texas A&M University-San Antonio. Under the agreement, A&M San Antonio will become an operating partner of Edgewood ISD institutions, Gus Garcia Middle School and the Burleson Center for Innovation and Education. The agreement details a collaboration with Edgewood ISD that provides Gus Garcia and Burleson Center administrative leadership, teachers, and the surrounding community with the support needed to improve outcomes for current and future students. This collaboration is the first of its kind under SB 1882, legislation that incentivizes ISD partnerships with institutions of higher education and other entities in order to improve student outcomes. These partnerships aim to create equitable opportunities and enhance social mobility, income growth, and career readiness to help tackle persistent challenges in underserved communities.

IMPROVING ACADEMIC & OPERATIONAL EXCELLENCE

Edgewood ISD has identified a set of goals and corresponding strategic performance objectives to achieve the district's mission of providing students with an exceptional learning experience that engages, empowers, and prepares students to compete and reach their highest potential in an ever-changing world.

- Goal 1: Student Achievement – Improve academic outcomes and prepare students to be career and college ready
- Goal 2: Organizational Learning and Leadership Development
- Goal 3: Exceptional Learners – Improve instructional programs to meet the needs of all exceptional learners
- Goal 4: Student Support Services – Provide well-rounded education to increase student achievement
- Goal 5: Family/Community Engagement – Build respectful and trustful partnerships with parents

Please reference the Edgewood ISD 2019-2020 Improvement Plan for detailed information on the specific performance objectives and strategies being implemented to achieve these goals.

Winston Elementary School

Winston Elementary is listed as a 'call to schools' and will join the STEAM Innovation Zone in August 2021. The school will offer instruction for grades 3-5 as an Intermediate STEAM School with a new tech Project-Based Learning (PBL) instructional model, two-way dual language, and blended learning.

In the interim, to address the school's current deficiencies, the 2019-2020 Campus Improvement Plan outlined comprehensive support strategies:

- Students will improve reading and writing through the application of the Balanced Literacy Initiative.

- Students will engage in guided reading lessons with workstations in which text selection is based on student's instructional reading level using Scholastic Leveled Book Room and library resources.
- Students will apply research-based writing strategies across all content areas that ensure Writing Texas Essential Knowledge and Skills (TEKS) are addressed through the use of interactive journals, thinking maps, and foldables.
- Students will participate in targeted Reading interventions based on data such as iRead, Open Court/Estrellitas (Tier 2), Leveled Literacy Intervention (LLI) for Tier 3. Students will use Accelerated Reader from Renaissance Learning to help build comprehension and fluency skills.
- K-2 students will participate in intervention for math fluency based on Texas Early Mathematics (TEM) data.
- Students will increase their math fluency skills using Dreambox. Students will participate in a Dreambox challenge to improve math concepts.

Please reference the Winston Elementary 2019-2020 Improvement Plan for detailed information on the specific performance objectives for each of the Campus Improvement Plan goals.

In addition to the Campus Improvement Plan, Winston Elementary has instituted the 2019-2020 Turnaround Plan which will improve foundational practices at the campus by working with a vetted improvement program and/or developing an internal capacity building plan. This Turnaround Plan provides the organizational and operational framework to evaluate the current vs full implementation of the following goals:

- Develop campus instructional leaders with clear roles and responsibilities.
- Recruit, select, assign, induct and retain a full staff of highly qualified educators.
- Compelling and aligned vision, mission, goals, values focused on a safe environment and high expectations.
- Curriculum and assessments aligned to TEKS with a year-long scope and sequence.
- Objective driven daily lesson plans with formative assessments.
- Data-driven instruction.

Brentwood Middle School

As of August 2019 – after a \$1.2 million investment in technology, upgrades, and renovations – Brentwood Middle School is now the Brentwood STEAM School of Innovation. The new middle school first enrolled sixth grade students for the 2019-20 school year. Seventh grade instruction will be added in the 2020-2021 school years, and then, in 2021-2022, Brentwood STEAM School of Innovation will add eighth grade and provide instruction for all three grade levels (6-8).

To address the school's current deficiencies and achieve the campus vision of preparing students for success in 9th grade and beyond, the 2019-2020 Campus Improvement Plan outlined comprehensive support strategies:

- Provide staff development for Dyslexia teachers to identify and service students in the Dyslexia Program.

- Students will use mathematical processes to acquire and demonstrate a district problem solving model that incorporates analyzing, planning, solving, and justifying/evaluating.
- Students will use internet-based instructional materials on a variety of platforms to increase learning and achievement in the math classroom.
- Students will engage in Social Studies instruction designed around process standards by incorporating stimuli, various instructional strategies and identified critical thinking skills.
- Students will analyze primary sources, vocabulary instruction, and other stimuli to build reading, critical thinking, and writing skills to deepen their understanding of history in grades K-12.
- Students will utilize dual coded STAAR based assessment questions to help increase conceptual understanding of social studies TEKS.
- Student will participate in the analysis of stimuli, discussion, and debate to formulate their own ideas and to write evidence-based arguments.
- Students in 6 - 8 will participate in engaging technology lessons for the purpose of improving reading, math, writing, science and social studies instruction. 5th & 8th grade students will complete their TechApps.
- Students will participate in viable technology lessons that support, extend and enhance the core content area lessons.
- Instructional Coaches will align lessons with classroom instruction in order to bring relevance and real-world connections to classroom lessons.
- Students will participate in assessments and benchmarks to monitor student progress in TEKS mastery throughout the year.
- Teachers and Instructional Coaches will have the opportunity to develop and review assessments.
- Students will participate in summer school acceleration and enrichment activities to prepare them for subsequent grade levels.
- Disseminate information regarding Federal and State Accountability as well as provide in-depth data disaggregation for analysis, predictions, and program effectiveness using evaluation tools for data analysis.

Please reference the Brentwood Middle School 2019-2020 Improvement Plan for detailed information on the specific performance objectives for each of the Campus Improvement Plan goals and performance objectives.

John F. Kennedy High School

JFK High School is an Early College campus with dual credit/college credit courses and CTE programs. It is listed as a 'call to schools' and will join the STEAM Innovation Zone in August 2021.

As part of the comprehensive support strategies of the high school's Campus Improvement Plan:

- Students will engage in vertically aligned lessons to include vocabulary development with depth and complexity based on intensive grade level planning that utilizes supplemental resources, and research-based strategies.

- Students will apply research-based comprehension and writing strategies that ensure reading TEKS objectives are met with appropriate depth and complexity to purposefully advance understanding, comprehension and critical thinking in relation to literary texts.
- Students will engage in Social Studies instruction designed around process standards by incorporating stimuli, various instructional strategies and identified critical thinking skills.
- Students will participate in hands on activities to create engaging experiences.
- Students will engage in productive struggle via low-floor, high-ceiling problems to enhance their critical thinking and problem-solving skills.
- Students will use interactive notebooks to organize, process and reference content knowledge including vocabulary and labeled stimuli.
- Students will participate in viable technology lessons that support, extend and enhance the core content area lessons, in order to bring relevance and real-world connections to classroom lessons.
- Increase expertise in TEKS through development of supplemental materials, assessment, data analysis, curriculum review.
- The campus will provide a qualified mentor to newly hired teachers with 0-3 years of experience.
- All teachers will participate in EDGE meetings to develop Thinking Classrooms through quality questioning.
- Students will participate in curriculum-based assessments and benchmarks to monitor student progress in TEKS mastery throughout the year.

Please reference the Brentwood Middle School 2019-2020 Improvement Plan for detailed information on the specific performance objectives for each of the Campus Improvement Plan goals and performance objectives.

EXISTING PROBLEMS

While Edgewood ISD has taken significant measures and made/will continue to make significant progress in School Progress and Relative Performance, the district has identified several areas that need attention in order to reach their goals. These problems include young students beginning school with only “beginning reader” skills, student truancy at all age levels, including Pre-K, graduation rate and low numbers of college bound students. These are reflected in the Problem Statements and Root Causes below and further discussed in the District Improvement Plan.

Demographics

- Problem Statement: The district graduation rate for special education is 78.6% and the graduation rate for the state is at 90%. Root Cause: Chronic absenteeism from our special ed students is a contributor to our district graduation rate.
- Problem Statement: End-of-Course STAAR performance is an area of need for English Learners with pass rates 3% (Algebra I) to 21% (English II) lower than all students. Root Cause: The rate of English language proficiency development is not keeping pace with the level of academic rigor expected at the high school level.

- Problem Statement: Enrollment in the district continues to drop by about 4% each year. Root Cause: High mobility rates and competition from public charter schools and private schools draw away students.
- Problem Statement: The district attendance rate is 92.9%, which is below the state average of 95.7%. Root Cause: Behavioral patterns of truancy and class skipping are evident at the secondary school level. Attendance rates at the early childhood centers indicate that not all parents are consistently bringing their children to school.
- Problem Statement: Homeless students have a 2.8% lower attendance rate lower attendance rate than the general student population attendance rate. Root Cause: Socio-economic challenges associated with poverty and home stability serve as obstacles to regular school attendance.

Student Academic Achievement

- Problem Statement: 2018: Only 58% of K-3rd grade students were reading at grade level by the end of the 2018 school year. Root Cause: The majority of EISD students are entering first grade at a "beginning reader" level and are not ready for independent reading
- Problem Statement: The percentage of students in grades 3-5 who meet Approaches Grade Level standard or above on 2019 reading STAAR is 62%, and the percentage of students in grades 6-8 who meet Approaches Grade Level standard or above on reading STAAR is 59%. Root Cause: Ineffective Tier instruction due to lack of professional development for campus staff in teaching to the standards and implementing rigorous TEKS instruction. Ineffective ELAR interventions for Tier 3 and 2 students due to low usage, lack of fidelity to the program, and lack of monitoring.
- Problem Statement: The Four-Year Longitudinal Graduation Rate (Graduated, Continued in School, or Received GED) is 91.9% (Class of 2018 reported in 2019) compared to the state average. Root Cause: Tier 1 Instruction needs improvement in pedagogical implementation, content-deepening, and cultural relevance in all areas emphasizing literacy, math.
- Problem Statement: 2018: The percent of college, career and military ready (CCMR) students is 30% with the percent of students prepared for the traditional college track below 20%. Root Cause: The majority of EISD students score well below the 50th percentile on PSAT/SAT and ACT assessments indicating many are not ready for college level work.

School Processes and Programs

- Problem Statement: Kinder Readiness data indicate that only 32% of the students were performing on level. Root Cause: Analysis of data indicates that teachers are not effectively differentiating classroom instruction based on the results from student data.

PROMOTING IMPROVED OUTCOMES IN EDUCATION & HOUSING

Rather than be part of the problem, the Development is proposed as part of the solution. In its current state, the property has fallen into disrepair, with several buildings boarded up due to fire damage. As of the last rent roll from the current owner (January 2020), the property had a vacancy rate of over 60% - with most units in such poor condition as to be unlivable. We propose the rehabilitation of Preserve at

the Port as a substantial investment in the existing community – a \$57 million historic renovation that would provide all 384 units as attractive, high-quality affordable housing for current occupants and district residents. It has been proven time and again that when families have access to quality stable housing, children perform better academically. While many factors affect school outcomes among low-income children, including parental involvement and school quality, meeting children’s basic housing needs is a critical part of school readiness and academic success.

Health problems related to inadequate housing quality may affect school attendance, putting children behind in schoolwork and lowering academic achievement. Evidence shows that families living in low-quality housing, particularly children, may suffer severe health consequences. These health problems can lead to absenteeism or inattentiveness in the classroom, which are both directly linked to poor educational outcomes. Residential instability may also lead to absenteeism and school changes. Students who change schools frequently lag behind their non-mobile students by a year or more in reading and math, and half of this difference can be attributed to mobility. Low-income families, generally, have high mobility rates.

Another issue identified is lack of attendance by students including those in the Pre-K to middle school age groups. Providing stable housing opportunities allows parents more opportunities to focus on their children and engage in their education instead of needing to worry about safety and shelter. Furthermore, residential stability is often affected by housing quality and housing affordability and can lead to an uninterrupted school year, avoid disruptions at home caused by an unplanned move, and lead to fewer school changes that leave children behind academically. Since housing is the biggest expenditure in household budgets, quality affordable housing can provide families with financial security, leading to improvements in housing quality and residential stability – leading to better educational outcomes.

In addition to providing high-quality affordable housing units, Preserve at the Port is looking to partner with Edgewood ISD to create afterschool programs that support students and parents to perform better in school and to achieve greater academic success. The proposed Development will provide a dedicated learning center for students with afterschool support activities that will correspond to the schools’ core curriculums. Resident supportive services will be provided, including ESL courses will be offered for both students and adults to assure greater success academically and to encourage dual language proficiency; the majority of the population in Edgewood ISD is Hispanic with Spanish-speaking households. Two of the problems identified by Edgewood ISD were: only 58% of K-3rd grade students were reading at grade level by the end of the 2018 school year, which can in part be attributed to a lack of English language proficiency; and end-of-Course STAAR performance is an area of need for English Learners with pass rates 3% (Algebra I) to 21% (English II) lower than all students. The district directly identified the root cause of the latter as being the rate of English language proficiency development is not keeping pace with the level of academic rigor expected at the high school level.

Finally, afterschool programs at the Development would help address the issues of academic success and learning by providing tutoring and assistance with homework. These afterschool programs not only provide supplemental instruction, but they also provide safe places for students to go after school and before parents typically return from work.

PENDING INFORMATIONAL REQUESTS

Members of the Development Team have reached out to the Edgewood ISD with only minimal success. Due to the pandemic and 'state at home' orders, acquiring information and statements from the school board and district superintendent has been more difficult than usual. As we acquire more insight and greater detail on the District's Innovation Plan, we will be able to provide it to TDHCA staff and the Board.

CONCLUSION

Together, the innovation and transformational change occurring in the school district and the benefits of the proposed Development demonstrate there is a positive trend in the overall school district performance that indicates high probability and reasonable expectation that continued actions being taken by the school district will significantly improve the schools' accountability ratings, through continued improvement, prior to the Development being placement in service. As an occupied rehabilitation development, the project as proposed (and the units, amenities, and services that it will provide) presents an opportunity to help address the underlying causes of poor academic achievement and provide supplemental programming aimed at improving educational outcomes.

The property as it exists today provides no added benefit or value to the existing residents, the surrounding community, or the school district. While we can't change the existing property's location within Edgewood ISD, we can certainly bring much needed safe, quality housing to the community and provide on-site programming that contributes to the ability of students to perform better at school.

By granting the requested waiver, such approval would better serve the policies and purposes articulated in Tex. Gov't Code §§2306.001, 2306.002, 2306.359, and 2306.6701 than not granting the waiver. Approval of the waiver would:

- Produce the greatest number of high-quality units.
- Encourage the development and preservation of appropriate types of rental housing for households that have difficulty finding suitable, affordable rental housing in the private marketplace.
- Maximize the number of suitable, affordable residential rental units added to the state's housing supply by rehabilitating structures on the site that are currently vacant and unlivable.
- Prevent losses for any reason to the state's supply of suitable, affordable residential rental units by enabling the rehabilitation of rental housing or by providing other preventive financial support.
- Provide for the participation of for-profit organizations and provide for and encourage the participation of nonprofit organizations in the acquisition, development, and operation of affordable housing developments in urban and rural communities.

SCHOOLS OF INNOVATION

[Edgewood ISD](#) / [About EISD](#) / Schools of Innovation



Edgewood Independent School District is relentlessly committed to providing our students with a next-level education that best fits their diverse skills. Our plan to continue this goal is developing our five innovation zones in the next five years. Your family now has the opportunity to choose from all Edgewood schools and

programs designed to best fit the individual interests of their child. Edgewood ISD is an open-boundary school district; all students from Bexar County can apply to an Edgewood School of Innovation.

[An application is required to gain admission into these schools and programs. We are now accepting applications for the 2020-2021 academic year.](#)

Schools of Innovation	Apply Now	Sign Up for News & Updates	Call for Schools	Resources
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Never miss an update. Sign up for our Newsletter today.

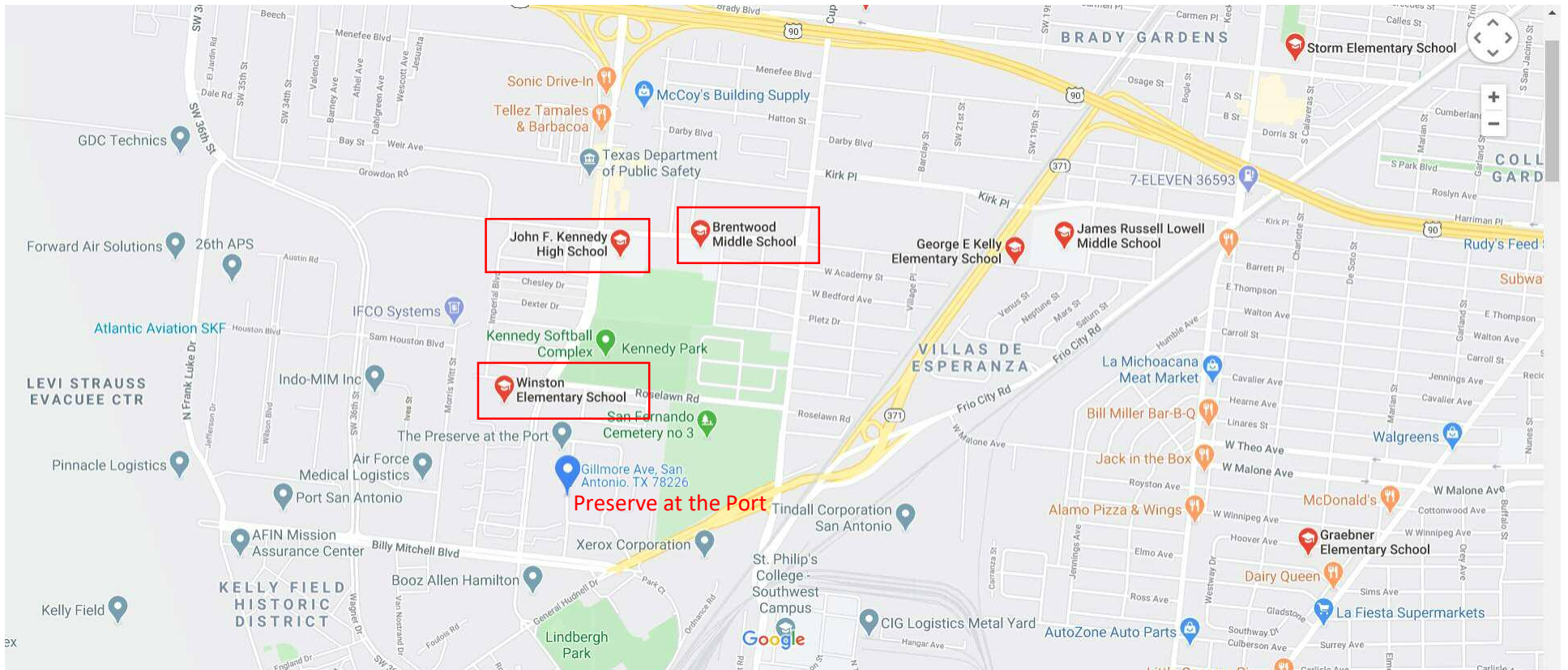
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Location of closest schools to Preserve at the Port





Accountability Data Performance Participation Attendance and Graduation

Postsecondary Readiness Profile KG Readiness Postsecondary Outcomes

Finance Data

Search

Texas Education Agency 2019 Accountability Ratings Overall Summary EDGEWOOD ISD (015905)

Accountability Rating Summary

	Component Score	Scaled Score	Rating
Overall		78	C
Student Achievement		69	D
STAAR Performance	33	58	
College, Career and Military Readiness	55	83	
Graduation Rate	91.4	65	
School Progress		81	B
Academic Growth	58	57	F
Relative Performance (Eco Dis: 94.7%)	44	81	B
Closing the Gaps	30	70	C

Distinction Designations

Postsecondary Readiness Not Earned



Accountability Data Performance Participation Attendance and Graduation

Postsecondary Readiness Profile KG Readiness Postsecondary Outcomes

Finance Data Search

**Texas Education Agency
2018 Accountability Ratings Overall Summary
EDGEWOOD ISD (015905)**

	Component Score	Scaled Score	Rating
Overall		63	D
Student Achievement		60	D
STAAR Performance	31	56	
College, Career and Military Readiness	30	61	
Graduation Rate	90.7	65	
School Progress		64	D
Academic Growth	62	59	F
Relative Performance (Eco Dis: 93.2%)	31	64	D
Closing the Gaps	17	61	D

Distinction Designations

Postsecondary Readiness Not Earned

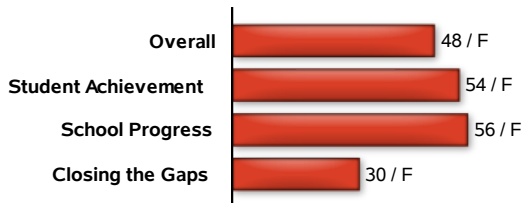
**Texas Education Agency
2018-19 School Report Card
WINSTON EL (015905116)**

Accountability Rating

F

WINSTON EL earned an F (below 60) for unacceptable performance by serving only a small number of students well. Most students need more academic support for eventual success in college, a career, or the military.

State accountability ratings are based on three domains: Student Achievement, School Progress, and Closing the Gaps. The graph below provides summary results for WINSTON EL. Scores are scaled from 0 to 100 to align with letter grades.



School Information

District Name: EDGEWOOD ISD
Campus Type: Elementary
Total Students: 455
Grade Span: PK - 05

For more information about this campus, see <https://TXSchools.gov> or the Texas Academic Performance Report at <https://rptsvr1.tea.texas.gov/perfreport/tapr/2019/index.html>.

Distinction Designations

Campuses that earn a rating of A-D are eligible for as many as seven distinction designations, or awards for outstanding performance.

- X ELA/Reading
- X Mathematics
- X Science
- X Comparative Academic Growth
- X Comparative Closing the Gaps
- X Postsecondary Readiness

School and Student Information

This section provides demographic information about WINSTON EL, including attendance rates; enrollment percentages for various student groups; student mobility rates; and class size averages at the campus, district, and state level, where applicable.

	Campus	District	State
Attendance Rate (2017-18)	94.5%	92.8%	95.4%
Enrollment by Race/Ethnicity			
African American	2.0%	1.4%	12.6%
Hispanic	96.0%	97.2%	52.6%
White	1.8%	0.6%	27.4%
American Indian	0.0%	0.0%	0.4%
Asian	0.2%	0.5%	4.5%
Pacific Islander	0.0%	0.0%	0.2%
Two or More Races	0.0%	0.2%	2.4%
Enrollment by Student Group			
Economically Disadvantaged	95.4%	94.7%	60.6%
English Learners	18.9%	20.5%	19.5%
Special Education	10.5%	10.2%	9.6%
Mobility Rate (2017-18)	27.8%	32.8%	15.4%

	Campus	District	State
Class Size Averages by Grade or Subject			
Elementary			
Kindergarten	16.3	17.0	18.9
Grade 1	15.3	18.7	18.8
Grade 2	16.5	19.4	18.7
Grade 3	18.0	18.9	18.9
Grade 4	21.7	18.8	19.2
Grade 5	23.5	21.7	21.2

School Financial Information (2017-18)

Various financial indicators based on actual data from the prior year are reported for the campus, district, and state. For more information, see <http://tea.texas.gov/financialstandardreports/>.

	Campus	District	State
Instructional Staff Percent	n/a	60.3%	64.5%
Instructional Expenditure Ratio	n/a	59.8%	62.7%

	Campus	District	State
Expenditures per Student			
Total Operating Expenditures	\$9,279	\$11,800	\$9,844
Instruction	\$6,272	\$5,757	\$5,492
Instructional Leadership	\$355	\$291	\$155
School Leadership	\$765	\$684	\$576

**Texas Education Agency
2018-19 School Report Card
WINSTON EL (015905116)**

STAAR Outcomes

This section provides STAAR performance and Academic Growth outcomes. Academic Growth measures whether students are maintaining performance or improving from year to year.

		State	District	Campus	African American	Hispanic	White	American Indian	Asian	Pacific Islander	Two or More Races	Econ Disadv
STAAR Performance Rates at Approaches Grade Level or Above (All Grades Tested)												
All Subjects	2019	78%	60%	54%	38%	54%	74%	-	*	-	-	54%
	2018	77%	59%	54%	25%	54%	57%	-	-	-	-	53%
ELA/Reading	2019	75%	57%	59%	50%	58%	86%	-	*	-	-	59%
	2018	74%	56%	56%	*	57%	*	-	-	-	-	56%
Mathematics	2019	82%	64%	59%	50%	59%	71%	-	*	-	-	59%
	2018	81%	66%	60%	*	60%	*	-	-	-	-	59%
Writing	2019	68%	44%	38%	*	37%	*	-	*	-	-	39%
	2018	66%	42%	35%	*	37%	*	-	-	-	-	33%
Science	2019	81%	64%	43%	*	44%	*	-	-	-	-	40%
	2018	80%	62%	42%	-	42%	-	-	-	-	-	42%
STAAR Performance Rates at Meets Grade Level or Above (All Grades Tested)												
All Subjects	2019	50%	29%	21%	13%	22%	16%	-	*	-	-	21%
	2018	48%	26%	22%	0%	22%	0%	-	-	-	-	21%
ELA/Reading	2019	48%	26%	22%	17%	22%	14%	-	*	-	-	21%
	2018	46%	25%	23%	*	23%	*	-	-	-	-	22%
Mathematics	2019	52%	30%	22%	17%	23%	14%	-	*	-	-	22%
	2018	50%	28%	26%	*	27%	*	-	-	-	-	25%
Writing	2019	38%	17%	10%	*	11%	*	-	*	-	-	10%
	2018	41%	19%	16%	*	17%	*	-	-	-	-	14%
Science	2019	54%	30%	28%	*	28%	*	-	-	-	-	27%
	2018	51%	27%	9%	-	9%	-	-	-	-	-	7%
STAAR Performance Rates at Masters Grade Level (All Grades Tested)												
All Subjects	2019	24%	10%	9%	13%	9%	11%	-	*	-	-	9%
	2018	22%	8%	7%	0%	7%	0%	-	-	-	-	6%
ELA/Reading	2019	21%	7%	12%	17%	12%	14%	-	*	-	-	11%
	2018	19%	7%	8%	*	8%	*	-	-	-	-	8%
Mathematics	2019	26%	13%	11%	17%	10%	14%	-	*	-	-	11%
	2018	24%	10%	7%	*	7%	*	-	-	-	-	7%
Writing	2019	14%	4%	2%	*	3%	*	-	*	-	-	3%
	2018	13%	3%	5%	*	5%	*	-	-	-	-	3%
Science	2019	25%	8%	6%	*	6%	*	-	-	-	-	6%
	2018	23%	7%	2%	-	2%	-	-	-	-	-	0%
Academic Growth Score (All Grades Tested)												
Both Subjects	2019	69	58	55	50	56	30	-	*	-	-	54
	2018	69	62	57	*	58	*	-	-	-	-	58
ELA/Reading	2019	68	60	53	*	54	30	-	*	-	-	52
	2018	69	63	61	*	62	*	-	-	-	-	63
Mathematics	2019	70	56	57	*	58	30	-	*	-	-	56
	2018	70	60	53	*	54	*	-	-	-	-	54

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 n/a Indicates data reporting is not applicable for this group.

**Texas Education Agency
2018-19 School Report Card
WINSTON EL (015905116)**

Prior-Year Non-Proficient and Student Success Initiative STAAR Outcomes

Progress of Prior-Year Non-Proficient Students shows STAAR performance rates for students who did not perform satisfactorily in 2017-18 but did in 2018-19. Student Success Initiative shows rates related to the requirement for students to demonstrate proficiency on the reading and mathematics STAAR in grades 5 and 8.

	State	District	Campus	African American	Hispanic	White	American Indian	Asian	Pacific Islander	Two or More Races	Econ Disadv
Progress of Prior-Year Non-Proficient Students											
Sum of Grades 4-8											
Reading											
2019	41%	30%	36%	*	37%	*	-	*	-	-	12%
2018	38%	32%	20%	*	21%	*	-	-	-	-	*
Mathematics											
2019	45%	28%	22%	*	24%	*	-	*	-	-	0%
2018	47%	38%	17%	*	19%	*	-	-	-	-	*
Students Success Initiative											
Grade 5 Reading											
Students Meeting Approaches Grade Level on First STAAR Administration											
2019	78%	56%	52%	*	54%	*	-	-	-	-	14%
Students Requiring Accelerated Instruction											
2019	22%	44%	48%	*	46%	*	-	-	-	-	86%
STAAR Cumulative Met Standard											
2019	86%	72%	72%	*	73%	*	-	-	-	-	29%
Grade 5 Mathematics											
Students Meeting Approaches Grade Level on First STAAR Administration											
2019	83%	65%	52%	*	54%	*	-	-	-	-	14%
Students Requiring Accelerated Instruction											
2019	17%	35%	48%	*	46%	*	-	-	-	-	86%
STAAR Cumulative Met Standard											
2019	90%	76%	63%	*	65%	*	-	-	-	-	14%

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Texas Education Agency
2018-19 School Report Card
WINSTON EL (015905116)

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**Texas Education Agency
2017-18 School Report Card
WINSTON EL (015905116)**

District Name: **EDGEWOOD ISD**
Campus Type: **Elementary**

Total Students: **433**
Grade Span: **PK - 05**

2018 Performance

State accountability ratings are based on three domains: Student Achievement, Student Progress, and Closing the Gaps. The table below provides a summary of domain results as well as an overall result for this campus. The scaled score is a numeric score that has been scaled from 0 to 100 for comparability across domains. In 2018, to receive the Met Standard or Met Alternative Standard accountability rating, campuses must meet a scaled score of 60 or above.

	Rating	Scaled Score
Overall	Improvement Required	57
Student Achievement	Improvement Required	54
School Progress	Improvement Required	56
Closing the Gaps	Improvement Required	58

2018 Accountability Rating

Improvement Required

For 2018 state accountability, campuses are rated as **Met Standard**, **Improvement Required**, or **Not Rated**. The rating, **Met Alternative Standard**, is assigned to charters and alternative education campuses evaluated under alternative education accountability (AEA) provisions.

School and Student Information

This section provides demographic information about the campus, including attendance rates; enrollment percentages for various student groups; student mobility rates; and class size averages at the campus, district, and state level, where applicable.

	Campus	District	State		Campus	District	State
Attendance Rate (2016-17)	95.0%	93.0%	95.7%	Class Size Averages by Grade or Subject			
Enrollment by Race/Ethnicity				Elementary			
African American	1.6%	1.5%	12.6%	Kindergarten	15.7	17.1	18.7
Hispanic	97.2%	97.4%	52.4%	Grade 1	18.0	17.4	18.8
White	0.9%	0.6%	27.8%	Grade 2	16.7	17.7	18.8
American Indian	0.0%	0.0%	0.4%	Grade 3	15.8	17.1	19.0
Asian	0.2%	0.3%	4.4%	Grade 4	18.0	18.4	19.2
Pacific Islander	0.0%	0.0%	0.1%	Grade 5	17.0	19.8	21.2
Two or More Races	0.0%	0.1%	2.3%				
Enrollment by Student Group							
Economically Disadvantaged	96.1%	93.2%	58.8%				
English Learners	18.9%	19.7%	18.8%				
Special Education	10.9%	10.0%	9.1%				
Mobility Rate (2016-17)	26.0%	24.0%	16.0%				

School Financial Information (2016-17)

Various financial indicators are reported for the campus, district, and state, where applicable, based on actual data from the prior year. For more information, see <http://tea.texas.gov/financialstandardreports/>.

	Campus	District	State		Campus	District	State
Instructional Staff Percent	n/a	59.8%	64.4%	Expenditures per Student			
Instructional Expenditure Ratio	n/a	59.4%	63.1%	Total Operating Expenditures	\$7,223	\$10,890	\$9,503
				Instruction	\$5,236	\$5,585	\$5,338
				Instructional Leadership	\$232	\$254	\$149
				School Leadership	\$571	\$629	\$555

		State	District	Campus	African American	Hispanic	White	American Indian	Asian	Pacific Islander	Two or More Races	Econ Disadv
STAAR Performance Rates at Approaches Grade Level or Above (All Grades Tested)												
All Subjects	2018	77%	59%	54%	*	54%	*	-	-	-	-	53%
	2017	75%	61%	55%	*	56%	*	-	-	-	-	53%
Reading	2018	74%	56%	56%	*	57%	*	-	-	-	-	56%
	2017	72%	56%	53%	*	54%	*	-	-	-	-	50%
Mathematics	2018	81%	66%	60%	*	60%	*	-	-	-	-	59%
	2017	79%	68%	63%	*	64%	*	-	-	-	-	60%
Writing	2018	66%	42%	*	*	*	*	-	-	-	-	*
	2017	67%	48%	*	-	*	*	-	-	-	-	*
Science	2018	80%	62%	*	-	*	-	-	-	-	-	*
	2017	79%	67%	55%	-	56%	*	-	-	-	-	*
STAAR Performance Rates at Meets Grade Level or Above (All Grades Tested)												
All Subjects	2018	48%	26%	22%	*	22%	*	-	-	-	-	21%
	2017	45%	26%	25%	*	25%	*	-	-	-	-	21%
Reading	2018	46%	25%	23%	*	23%	*	-	-	-	-	22%
	2017	44%	24%	23%	*	24%	*	-	-	-	-	20%
Mathematics	2018	50%	28%	26%	*	27%	*	-	-	-	-	25%
	2017	46%	30%	30%	*	31%	*	-	-	-	-	27%
Writing	2018	41%	19%	*	*	*	*	-	-	-	-	*
	2017	36%	18%	*	-	*	*	-	-	-	-	*
Science	2018	51%	27%	*	-	*	-	-	-	-	-	*
	2017	49%	30%	25%	-	26%	*	-	-	-	-	*
STAAR Performance Rates at Masters Grade Level (All Grades Tested)												
All Subjects	2018	22%	8%	7%	*	7%	*	-	-	-	-	6%
	2017	20%	8%	9%	*	9%	*	-	-	-	-	7%
Reading	2018	19%	7%	8%	*	8%	*	-	-	-	-	8%
	2017	19%	7%	12%	*	12%	*	-	-	-	-	10%
Mathematics	2018	24%	10%	7%	*	7%	*	-	-	-	-	7%
	2017	22%	11%	9%	*	9%	*	-	-	-	-	6%
Writing	2018	13%	3%	*	*	*	*	-	-	-	-	*
	2017	11%	4%	*	-	*	*	-	-	-	-	*
Science	2018	23%	7%	*	-	*	-	-	-	-	-	*
	2017	19%	8%	7%	-	7%	*	-	-	-	-	*
Academic Growth Score (All Grades Tested)												
All Subjects	2018	69	62	57	*	58	*	-	-	-	-	58
Reading	2018	69	63	61	*	62	*	-	-	-	-	63
Mathematics	2018	70	60	53	*	54	*	-	-	-	-	54

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		State	District	Campus	African American	Hispanic	White	American Indian	Asian	Pacific Islander	Two or More Races	Econ Disadv
Progress of Prior-Year Non-Proficient Students												
Sum of Grades 4-8												
Reading	2018	38%	32%	20%	*	21%	*	-	-	-	-	20%
	2017	35%	30%	22%	-	22%	*	-	-	-	-	22%
Mathematics	2018	47%	38%	17%	*	19%	*	-	-	-	-	18%
	2017	43%	36%	26%	-	27%	*	-	-	-	-	24%

Students Success Initiative

Grade 5 Reading

Students Meeting Approaches Grade Level on First STAAR Administration

2018	79%	61%	52%	-	52%	-	-	-	-	-	-	52%
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Students Requiring Accelerated Instruction

2018	21%	39%	48%	-	48%	-	-	-	-	-	-	48%
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STAAR Cumulative Met Standard

2018	84%	68%	57%	-	57%	-	-	-	-	-	-	57%
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Grade 5 Mathematics

Students Meeting Approaches Grade Level on First STAAR Administration

2018	85%	66%	51%	-	51%	-	-	-	-	-	-	49%
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Students Requiring Accelerated Instruction

2018	15%	34%	49%	-	49%	-	-	-	-	-	-	51%
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STAAR Cumulative Met Standard

2018	90%	77%	64%	-	64%	-	-	-	-	-	-	63%
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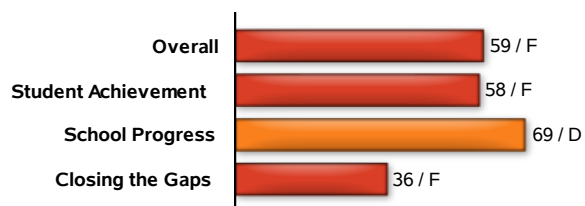
Texas Education Agency 2018-19 School Report Card BRENTWOOD MIDDLE (015905041)

Accountability Rating

F

BRENTWOOD MIDDLE earned an F (below 60) for unacceptable performance by serving only a small number of students well. Most students need more academic support for eventual success in college, a career, or the military.

State accountability ratings are based on three domains: Student Achievement, School Progress, and Closing the Gaps. The graph below provides summary results for BRENTWOOD MIDDLE. Scores are scaled from 0 to 100 to align with letter grades.



School Information

District Name: EDGEWOOD ISD
Campus Type: Middle School
Total Students: 607
Grade Span: 06 - 08

For more information about this campus, see <https://TXSchools.gov> or the Texas Academic Performance Report at <https://rptsvr1.tea.texas.gov/perfreport/tapr/2019/index.html>.

Distinction Designations

Campuses that earn a rating of A-D are eligible for as many as seven distinction designations, or awards for outstanding performance.

- X ELA/Reading
- X Mathematics
- X Science
- X Social Studies
- X Comparative Academic Growth
- X Comparative Closing the Gaps
- X Postsecondary Readiness

School and Student Information

This section provides demographic information about BRENTWOOD MIDDLE, including attendance rates; enrollment percentages for various student groups; student mobility rates; and class size averages at the campus, district, and state level, where applicable.

	Campus	District	State
Attendance Rate (2017-18)	92.1%	92.8%	95.4%
Enrollment by Race/Ethnicity			
African American	0.8%	1.4%	12.6%
Hispanic	98.5%	97.2%	52.6%
White	0.7%	0.6%	27.4%
American Indian	0.0%	0.0%	0.4%
Asian	0.0%	0.5%	4.5%
Pacific Islander	0.0%	0.0%	0.2%
Two or More Races	0.0%	0.2%	2.4%
Enrollment by Student Group			
Economically Disadvantaged	95.2%	94.7%	60.6%
English Learners	15.3%	20.5%	19.5%
Special Education	12.2%	10.2%	9.6%
Mobility Rate (2017-18)	20.9%	32.8%	15.4%

	Campus	District	State
Class Size Averages by Grade or Subject			
Elementary			
Grade 6	21.5	19.5	20.4
Secondary			
English/Language Arts	11.4	17.9	16.6
Foreign Languages	28.3	18.3	18.9
Mathematics	21.2	16.4	17.8
Science	17.3	17.6	18.9
Social Studies	20.7	19.5	19.3

School Financial Information (2017-18)

Various financial indicators based on actual data from the prior year are reported for the campus, district, and state. For more information, see <http://tea.texas.gov/financialstandardreports/>.

	Campus	District	State
Instructional Staff Percent	n/a	60.3%	64.5%
Instructional Expenditure Ratio	n/a	59.8%	62.7%

	Campus	District	State
Expenditures per Student			
Total Operating Expenditures	\$7,113	\$11,800	\$9,844
Instruction	\$4,618	\$5,757	\$5,492
Instructional Leadership	\$210	\$291	\$155
School Leadership	\$637	\$684	\$576

**Texas Education Agency
2018-19 School Report Card
BRENTWOOD MIDDLE (015905041)**

STAAR Outcomes

This section provides STAAR performance and Academic Growth outcomes. Academic Growth measures whether students are maintaining performance or improving from year to year.

		State	District	Campus	African American	Hispanic	White	American Indian	Asian	Pacific Islander	Two or More Races	Econ Disadv
STAAR Performance Rates at Approaches Grade Level or Above (All Grades Tested)												
All Subjects	2019	78%	60%	55%	56%	55%	43%	-	-	-	-	54%
	2018	77%	59%	55%	-	55%	*	-	-	-	*	54%
ELA/Reading	2019	75%	57%	60%	40%	60%	*	-	-	-	-	59%
	2018	74%	56%	61%	-	60%	*	-	-	-	*	59%
Mathematics	2019	82%	64%	61%	60%	61%	*	-	-	-	-	60%
	2018	81%	66%	65%	-	65%	*	-	-	-	*	64%
Writing	2019	68%	44%	39%	*	39%	*	-	-	-	-	37%
	2018	66%	42%	40%	-	40%	-	-	-	-	-	39%
Science	2019	81%	64%	64%	*	63%	-	-	-	-	-	64%
	2018	80%	62%	38%	-	38%	*	-	-	-	-	37%
Social Studies	2019	81%	68%	35%	*	35%	-	-	-	-	-	34%
	2018	78%	64%	46%	-	45%	*	-	-	-	-	45%
STAAR Performance Rates at Meets Grade Level or Above (All Grades Tested)												
All Subjects	2019	50%	29%	25%	38%	25%	29%	-	-	-	-	24%
	2018	48%	26%	23%	-	23%	*	-	-	-	*	21%
ELA/Reading	2019	48%	26%	26%	40%	26%	*	-	-	-	-	24%
	2018	46%	25%	23%	-	23%	*	-	-	-	*	22%
Mathematics	2019	52%	30%	31%	40%	31%	*	-	-	-	-	30%
	2018	50%	28%	27%	-	27%	*	-	-	-	*	25%
Writing	2019	38%	17%	16%	*	16%	*	-	-	-	-	15%
	2018	41%	19%	12%	-	12%	-	-	-	-	-	13%
Science	2019	54%	30%	30%	*	29%	-	-	-	-	-	30%
	2018	51%	27%	23%	-	23%	*	-	-	-	-	20%
Social Studies	2019	55%	42%	8%	*	9%	-	-	-	-	-	9%
	2018	53%	32%	19%	-	19%	*	-	-	-	-	16%
STAAR Performance Rates at Masters Grade Level (All Grades Tested)												
All Subjects	2019	24%	10%	9%	19%	9%	14%	-	-	-	-	8%
	2018	22%	8%	7%	-	7%	*	-	-	-	*	7%
ELA/Reading	2019	21%	7%	10%	40%	9%	*	-	-	-	-	8%
	2018	19%	7%	9%	-	9%	*	-	-	-	*	7%
Mathematics	2019	26%	13%	13%	0%	13%	*	-	-	-	-	13%
	2018	24%	10%	8%	-	8%	*	-	-	-	*	7%
Writing	2019	14%	4%	3%	*	3%	*	-	-	-	-	2%
	2018	13%	3%	1%	-	1%	-	-	-	-	-	1%
Science	2019	25%	8%	6%	*	5%	-	-	-	-	-	6%
	2018	23%	7%	10%	-	10%	*	-	-	-	-	9%
Social Studies	2019	33%	20%	2%	*	2%	-	-	-	-	-	2%
	2018	31%	13%	7%	-	7%	*	-	-	-	-	7%
Academic Growth Score (All Grades Tested)												
Both Subjects	2019	69	58	53	67	53	42	-	-	-	-	52
	2018	69	62	64	-	64	*	-	-	-	*	65
ELA/Reading	2019	68	60	56	*	55	*	-	-	-	-	55
	2018	69	63	64	-	64	*	-	-	-	*	66
Mathematics	2019	70	56	50	*	50	*	-	-	-	-	49
	2018	70	60	64	-	64	*	-	-	-	*	64

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**Texas Education Agency
2018-19 School Report Card
BRENTWOOD MIDDLE (015905041)**

Prior-Year Non-Proficient and Student Success Initiative STAAR Outcomes

Progress of Prior-Year Non-Proficient Students shows STAAR performance rates for students who did not perform satisfactorily in 2017-18 but did in 2018-19. Student Success Initiative shows rates related to the requirement for students to demonstrate proficiency on the reading and mathematics STAAR in grades 5 and 8.

	State	District	Campus	African American	Hispanic	White	American Indian	Asian	Pacific Islander	Two or More Races	Econ Disadv
Progress of Prior-Year Non-Proficient Students											
Sum of Grades 4-8											
Reading											
2019	41%	30%	27%	*	26%	*	-	-	-	-	5%
2018	38%	32%	27%	-	27%	-	-	-	-	-	15%
Mathematics											
2019	45%	28%	17%	*	17%	*	-	-	-	-	7%
2018	47%	38%	41%	-	41%	*	-	-	-	-	29%
Students Success Initiative											
Grade 8 Reading											
Students Meeting Approaches Grade Level on First STAAR Administration											
2019	78%	57%	58%	*	58%	-	-	-	-	-	0%
Students Requiring Accelerated Instruction											
2019	22%	43%	43%	*	42%	-	-	-	-	-	100%
STAAR Cumulative Met Standard											
2019	85%	66%	72%	*	73%	-	-	-	-	-	0%

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Texas Education Agency
2018-19 School Report Card
BRENTWOOD MIDDLE (015905041)

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**Texas Education Agency
2017-18 School Report Card
BRENTWOOD MIDDLE (015905041)**

District Name: **EDGEWOOD ISD**
Campus Type: **Middle School**

Total Students: **666**
Grade Span: **06 - 08**

2018 Performance

State accountability ratings are based on three domains: Student Achievement, Student Progress, and Closing the Gaps. The table below provides a summary of domain results as well as an overall result for this campus. The scaled score is a numeric score that has been scaled from 0 to 100 for comparability across domains. In 2018, to receive the Met Standard or Met Alternative Standard accountability rating, campuses must meet a scaled score of 60 or above.

	Rating	Scaled Score
Overall	Met Standard	67
Student Achievement	Improvement Required	56
School Progress	Met Standard	66
Closing the Gaps	Met Standard	68

2018 Accountability Rating

Met Standard

For 2018 state accountability, campuses are rated as **Met Standard**, **Improvement Required**, or **Not Rated**. The rating, **Met Alternative Standard**, is assigned to charters and alternative education campuses evaluated under alternative education accountability (AEA) provisions.

School and Student Information

This section provides demographic information about the campus, including attendance rates; enrollment percentages for various student groups; student mobility rates; and class size averages at the campus, district, and state level, where applicable.

	Campus	District	State		Campus	District	State
Attendance Rate (2016-17)	91.6%	93.0%	95.7%	Class Size Averages by Grade or Subject			
Enrollment by Race/Ethnicity				Elementary			
African American	0.0%	1.5%	12.6%	Grade 6	21.2	18.2	20.3
Hispanic	99.5%	97.4%	52.4%	Secondary			
White	0.3%	0.6%	27.8%	English/Language Arts	17.5	15.5	16.7
American Indian	0.0%	0.0%	0.4%	Foreign Languages	28.4	20.0	18.6
Asian	0.0%	0.3%	4.4%	Mathematics	21.1	14.6	17.9
Pacific Islander	0.0%	0.0%	0.1%	Science	24.5	14.8	19.0
Two or More Races	0.2%	0.1%	2.3%	Social Studies	26.1	17.7	19.3
Enrollment by Student Group							
Economically Disadvantaged	88.3%	93.2%	58.8%				
English Learners	15.5%	19.7%	18.8%				
Special Education	11.9%	10.0%	9.1%				
Mobility Rate (2016-17)	26.5%	24.0%	16.0%				

School Financial Information (2016-17)

Various financial indicators are reported for the campus, district, and state, where applicable, based on actual data from the prior year. For more information, see <http://tea.texas.gov/financialstandardreports/>.

	Campus	District	State		Campus	District	State
Instructional Staff Percent	n/a	59.8%	64.4%	Expenditures per Student			
Instructional Expenditure Ratio	n/a	59.4%	63.1%	Total Operating Expenditures	\$6,441	\$10,890	\$9,503
				Instruction	\$4,633	\$5,585	\$5,338
				Instructional Leadership	\$161	\$254	\$149
				School Leadership	\$555	\$629	\$555

		State	District	Campus	African American	Hispanic	White	American Indian	Asian	Pacific Islander	Two or More Races	Econ Disadv
STAAR Performance Rates at Approaches Grade Level or Above (All Grades Tested)												
All Subjects	2018	77%	59%	55%	-	55%	*	-	-	-	*	54%
	2017	75%	61%	57%	*	57%	*	-	*	-	-	56%
Reading	2018	74%	56%	61%	-	60%	*	-	-	-	*	59%
	2017	72%	56%	60%	*	60%	*	-	*	-	-	58%
Mathematics	2018	81%	66%	65%	-	65%	*	-	-	-	*	64%
	2017	79%	68%	61%	*	62%	*	-	*	-	-	62%
Writing	2018	66%	42%	*	-	*	-	-	-	-	-	*
	2017	67%	48%	*	*	*	*	-	-	-	-	*
Science	2018	80%	62%	38%	-	38%	*	-	-	-	-	37%
	2017	79%	67%	60%	-	59%	*	-	*	-	-	57%
Social Studies	2018	78%	64%	46%	-	45%	*	-	-	-	-	45%
	2017	77%	64%	50%	-	50%	*	-	*	-	-	47%
STAAR Performance Rates at Meets Grade Level or Above (All Grades Tested)												
All Subjects	2018	48%	26%	23%	-	23%	*	-	-	-	*	21%
	2017	45%	26%	21%	*	21%	*	-	*	-	-	21%
Reading	2018	46%	25%	23%	-	23%	*	-	-	-	*	22%
	2017	44%	24%	22%	*	22%	*	-	*	-	-	22%
Mathematics	2018	50%	28%	27%	-	27%	*	-	-	-	*	25%
	2017	46%	30%	24%	*	24%	*	-	*	-	-	23%
Writing	2018	41%	19%	*	-	*	-	-	-	-	-	*
	2017	36%	18%	*	*	*	*	-	-	-	-	*
Science	2018	51%	27%	23%	-	23%	*	-	-	-	-	20%
	2017	49%	30%	27%	-	27%	*	-	*	-	-	26%
Social Studies	2018	53%	32%	19%	-	19%	*	-	-	-	-	16%
	2017	49%	28%	17%	-	17%	*	-	*	-	-	15%
STAAR Performance Rates at Masters Grade Level (All Grades Tested)												
All Subjects	2018	22%	8%	7%	-	7%	*	-	-	-	*	7%
	2017	20%	8%	6%	*	6%	*	-	*	-	-	5%
Reading	2018	19%	7%	9%	-	9%	*	-	-	-	*	7%
	2017	19%	7%	6%	*	6%	*	-	*	-	-	6%
Mathematics	2018	24%	10%	8%	-	8%	*	-	-	-	*	7%
	2017	22%	11%	6%	*	6%	*	-	*	-	-	6%
Writing	2018	13%	3%	*	-	*	-	-	-	-	-	*
	2017	11%	4%	*	*	*	*	-	-	-	-	*
Science	2018	23%	7%	10%	-	10%	*	-	-	-	-	9%
	2017	19%	8%	5%	-	5%	*	-	*	-	-	5%
Social Studies	2018	31%	13%	7%	-	7%	*	-	-	-	-	7%
	2017	27%	9%	8%	-	8%	*	-	*	-	-	6%
Academic Growth Score (All Grades Tested)												
All Subjects	2018	69	62	64	-	64	*	-	-	-	*	65
Reading	2018	69	63	64	-	64	*	-	-	-	*	66
Mathematics	2018	70	60	64	-	64	*	-	-	-	*	64

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		State	District	Campus	African American	Hispanic	White	American Indian	Asian	Pacific Islander	Two or More Races	Econ Disadv
Progress of Prior-Year Non-Proficient Students												
Sum of Grades 4-8												
Reading	2018	38%	32%	27%	-	27%	-	-	-	-	-	28%
	2017	35%	30%	31%	*	31%	*	-	-	-	-	29%
Mathematics	2018	47%	38%	41%	-	41%	*	-	-	-	-	41%
	2017	43%	36%	34%	*	34%	-	-	-	-	-	35%
Students Success Initiative												
Grade 8 Reading												
Students Meeting Approaches Grade Level on First STAAR Administration												
	2018	79%	64%	59%	-	59%	*	-	-	-	-	57%
Students Requiring Accelerated Instruction												
	2018	21%	36%	41%	-	41%	*	-	-	-	-	43%
STAAR Cumulative Met Standard												
	2018	85%	75%	69%	-	69%	*	-	-	-	-	68%
Grade 8 Mathematics												
Students Meeting Approaches Grade Level on First STAAR Administration												
	2018	80%	57%	60%	-	60%	*	-	-	-	-	60%
Students Requiring Accelerated Instruction												
	2018	20%	43%	40%	-	40%	*	-	-	-	-	40%
STAAR Cumulative Met Standard												
	2018	86%	67%	69%	-	69%	*	-	-	-	-	69%

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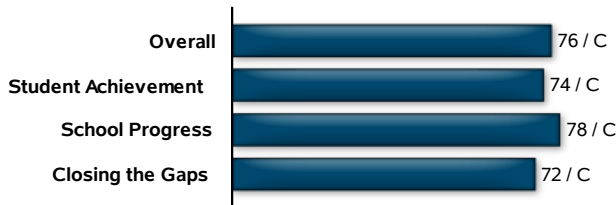
Texas Education Agency
2018-19 School Report Card
JOHN F KENNEDY H S (015905002)

Accountability Rating



JOHN F KENNEDY H S earned a C (70-79) for acceptable performance by serving many students well but needs to provide additional academic support to many more students.

State accountability ratings are based on three domains: Student Achievement, School Progress, and Closing the Gaps. The graph below provides summary results for JOHN F KENNEDY H S. Scores are scaled from 0 to 100 to align with letter grades.



School Information

District Name: EDGEWOOD ISD
Campus Type: High School
Total Students: 1,141
Grade Span: 09 - 12

For more information about this campus, see <https://TXSchools.gov> or the Texas Academic Performance Report at <https://rptsvr1.tea.texas.gov/perfreport/tapr/2019/index.html>.

Distinction Designations

Campuses that earn a rating of A-D are eligible for as many as seven distinction designations, or awards for outstanding performance.

- ✓ ELA/Reading
- ✓ Mathematics
- ✓ Social Studies
- ✓ Postsecondary Readiness
- ✗ Science
- ✗ Comparative Academic Growth
- ✗ Comparative Closing the Gaps

School and Student Information

This section provides demographic information about JOHN F KENNEDY H S, including attendance rates; enrollment percentages for various student groups; student mobility rates; and class size averages at the campus, district, and state level, where applicable.

	Campus	District	State
Attendance Rate (2017-18)	89.9%	92.8%	95.4%
Enrollment by Race/Ethnicity			
African American	1.3%	1.4%	12.6%
Hispanic	97.7%	97.2%	52.6%
White	0.7%	0.6%	27.4%
American Indian	0.0%	0.0%	0.4%
Asian	0.0%	0.5%	4.5%
Pacific Islander	0.0%	0.0%	0.2%
Two or More Races	0.3%	0.2%	2.4%
Enrollment by Student Group			
Economically Disadvantaged	92.0%	94.7%	60.6%
English Learners	10.0%	20.5%	19.5%
Special Education	11.4%	10.2%	9.6%
Mobility Rate (2017-18)	100.0%	32.8%	15.4%

	Campus	District	State
Class Size Averages by Grade or Subject			
Secondary			
English/Language Arts	18.1	17.9	16.6
Foreign Languages	16.5	18.3	18.9
Mathematics	16.6	16.4	17.8
Science	17.8	17.6	18.9
Social Studies	20.7	19.5	19.3

School Financial Information (2017-18)

Various financial indicators based on actual data from the prior year are reported for the campus, district, and state. For more information, see <http://tea.texas.gov/financialstandardreports/>.

	Campus	District	State
Instructional Staff Percent	n/a	60.3%	64.5%
Instructional Expenditure Ratio	n/a	59.8%	62.7%

	Campus	District	State
Expenditures per Student			
Total Operating Expenditures	\$8,555	\$11,800	\$9,844
Instruction	\$5,732	\$5,757	\$5,492
Instructional Leadership	\$320	\$291	\$155
School Leadership	\$728	\$684	\$576

**Texas Education Agency
2018-19 School Report Card
JOHN F KENNEDY H S (015905002)**

STAAR Outcomes

This section provides STAAR performance and Academic Growth outcomes. Academic Growth measures whether students are maintaining performance or improving from year to year.

		State	District	Campus	African American	Hispanic	White	American Indian	Asian	Pacific Islander	Two or More Races	Econ Disadv
STAAR Performance Rates at Approaches Grade Level or Above (All Grades Tested)												
All Subjects	2019	78%	60%	66%	53%	66%	100%	-	-	-	57%	65%
	2018	77%	59%	63%	82%	63%	67%	-	-	-	43%	63%
ELA/Reading	2019	75%	57%	53%	43%	53%	*	-	-	-	*	52%
	2018	74%	56%	50%	78%	50%	*	-	-	-	*	50%
Mathematics	2019	82%	64%	69%	*	69%	*	-	-	-	-	69%
	2018	81%	66%	71%	*	70%	*	-	-	-	*	71%
Science	2019	81%	64%	76%	*	77%	*	-	-	-	*	75%
	2018	80%	62%	73%	*	73%	*	-	-	-	*	73%
Social Studies	2019	81%	68%	92%	*	92%	*	-	-	-	*	91%
	2018	78%	64%	86%	*	86%	-	-	-	-	*	86%
STAAR Performance Rates at Meets Grade Level or Above (All Grades Tested)												
All Subjects	2019	50%	29%	36%	41%	36%	50%	-	-	-	43%	36%
	2018	48%	26%	29%	53%	29%	33%	-	-	-	0%	29%
ELA/Reading	2019	48%	26%	28%	29%	27%	*	-	-	-	*	27%
	2018	46%	25%	24%	33%	24%	*	-	-	-	*	24%
Mathematics	2019	52%	30%	32%	*	32%	*	-	-	-	-	31%
	2018	50%	28%	28%	*	28%	*	-	-	-	*	30%
Science	2019	54%	30%	38%	*	38%	*	-	-	-	*	37%
	2018	51%	27%	28%	*	28%	*	-	-	-	*	27%
Social Studies	2019	55%	42%	65%	*	65%	*	-	-	-	*	65%
	2018	53%	32%	47%	*	47%	-	-	-	-	*	47%
STAAR Performance Rates at Masters Grade Level (All Grades Tested)												
All Subjects	2019	24%	10%	9%	12%	9%	17%	-	-	-	14%	9%
	2018	22%	8%	6%	12%	6%	0%	-	-	-	0%	6%
ELA/Reading	2019	21%	7%	2%	0%	2%	*	-	-	-	*	2%
	2018	19%	7%	3%	11%	3%	*	-	-	-	*	3%
Mathematics	2019	26%	13%	15%	*	14%	*	-	-	-	-	15%
	2018	24%	10%	7%	*	7%	*	-	-	-	*	7%
Science	2019	25%	8%	5%	*	4%	*	-	-	-	*	5%
	2018	23%	7%	4%	*	4%	*	-	-	-	*	4%
Social Studies	2019	33%	20%	31%	*	31%	*	-	-	-	*	29%
	2018	31%	13%	20%	*	20%	-	-	-	-	*	20%
Academic Growth Score (All Grades Tested)												
Both Subjects	2019	69	58	60	*	60	*	-	-	-	*	60
	2018	69	62	60	83	60	*	-	-	-	*	60
ELA/Reading	2019	68	60	61	*	61	-	-	-	-	*	62
	2018	69	63	64	*	64	*	-	-	-	-	63
Mathematics	2019	70	56	58	*	59	*	-	-	-	-	57
	2018	70	60	55	*	55	*	-	-	-	*	56

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Texas Education Agency
2018-19 School Report Card
JOHN F KENNEDY H S (015905002)

Graduation and College, Career, and Military Readiness Outcomes

This section provides graduation, graduation plan, and College, Career, and Military Readiness rates.

	State	District	Campus	African American	Hispanic	White	American Indian	Asian	Pacific Islander	Two or More Races	Econ Disadv
Annual Dropout Rate (Gr 9-12)											
2017-18	1.9%	2.5%	1.0%	0.0%	0.9%	4.0%	*	*	*	0.0%	0.9%
2016-17	1.9%	2.1%	1.8%	5.3%	1.7%	5.9%	*	*	*	*	1.8%
4-Year Longitudinal Rate (Gr 9-12)											
Class of 2018											
Graduated	90.0%	90.9%	92.7%	*	92.6%	*	-	*	-	*	92.1%
Graduates, TxCHSE, & Cont	94.3%	91.9%	92.7%	*	92.6%	*	-	*	-	*	92.1%
Class of 2017											
Graduated	89.7%	90.7%	93.6%	*	93.8%	*	*	-	-	-	92.6%
Graduates, TxCHSE, & Cont	94.1%	92.0%	93.9%	*	94.1%	*	*	-	-	-	93.0%
5-Year Extended Longitudinal Rate (Gr 9-12)											
Class of 2017											
Graduated	92.0%	91.4%	94.0%	*	94.2%	*	*	-	-	-	93.1%
Graduates, TxCHSE, & Cont	93.7%	91.6%	94.0%	*	94.2%	*	*	-	-	-	93.1%
Class of 2016											
Graduated	91.6%	86.8%	90.2%	*	89.9%	*	-	-	-	*	89.3%
Graduates, TxCHSE, & Cont	93.4%	86.9%	90.2%	*	89.9%	*	-	-	-	*	89.3%
6-Year Extended Longitudinal Rate (Gr 9-12)											
Class of 2016											
Graduated	92.1%	86.6%	90.2%	*	89.9%	*	-	-	-	*	89.3%
Graduates, TxCHSE, & Cont	93.4%	86.9%	90.5%	*	90.3%	*	-	-	-	*	89.7%
Class of 2015											
Graduated	91.8%	90.0%	92.7%	100.0%	92.5%	*	*	-	-	-	91.9%
Graduates, TxCHSE, & Cont	93.3%	90.1%	92.7%	100.0%	92.5%	*	*	-	-	-	91.9%
4-Year Federal Graduation Rate Without Exclusions (Gr 9-12)											
Class of 2018	90.0%	87.2%	89.0%	*	89.1%	*	-	*	-	*	88.2%
Class of 2017	89.7%	87.3%	91.2%	*	91.3%	*	*	-	-	-	89.8%
RHSP/DAP Graduates (Longitudinal Rate)											
Class of 2018	68.5%	58.3%	57.1%	-	57.1%	-	-	-	-	-	*
Class of 2017	88.5%	94.0%	95.7%	*	96.3%	*	-	-	-	-	95.2%
RHSP/DAP/FHSP-E/FHSP-DLA Graduates (Longitudinal Rate)											
Class of 2018	86.8%	87.1%	89.7%	*	89.9%	*	-	*	-	*	89.5%
Class of 2017	85.9%	91.3%	93.5%	*	94.1%	*	-	-	-	-	92.9%
College, Career, and Military Ready (Annual Graduates)											
2017-18	65.5%	54.5%	49.2%	*	49.6%	*	-	*	-	*	49.1%
SAT/ACT Results (Annual Graduates)											
Tested											
2017-18	74.6%	100.0%	100.0%	*	100.0%	*	?	*	-	*	100.0%
2016-17	73.5%	46.9%	49.4%	100.0%	48.4%	50.0%	-	-	-	-	50.4%
Average SAT Score ***											
2017-18	1036	865	852	*	850	*	*	*	-	*	853
Average ACT Score ***											
2017-18	20.6	17.2	17.8	-	17.8	-	-	-	-	-	17.1

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*** Due to changes in the evaluation of SAT/ACT results (for 2017-18 the best result was used, rather than the most recent), 2016-17 SAT/ACT results are not comparable and, where applicable, are not shown.

Texas Education Agency
2018-19 School Report Card
JOHN F KENNEDY H S (015905002)

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**Texas Education Agency
2017-18 School Report Card
JOHN F KENNEDY H S (015905002)**

District Name: **EDGEWOOD ISD**
Campus Type: **High School**

Total Students: **1,172**
Grade Span: **09 - 12**

2018 Performance

State accountability ratings are based on three domains: Student Achievement, Student Progress, and Closing the Gaps. The table below provides a summary of domain results as well as an overall result for this campus. The scaled score is a numeric score that has been scaled from 0 to 100 for comparability across domains. In 2018, to receive the Met Standard or Met Alternative Standard accountability rating, campuses must meet a scaled score of 60 or above.

	Rating	Scaled Score
Overall	Met Standard	65
Student Achievement	Met Standard	63
School Progress	Met Standard	66
Closing the Gaps	Met Standard	64

2018 Accountability Rating

Met Standard

For 2018 state accountability, campuses are rated as **Met Standard**, **Improvement Required**, or **Not Rated**. The rating, **Met Alternative Standard**, is assigned to charters and alternative education campuses evaluated under alternative education accountability (AEA) provisions.

School and Student Information

This section provides demographic information about the campus, including attendance rates; enrollment percentages for various student groups; student mobility rates; and class size averages at the campus, district, and state level, where applicable.

	Campus	District	State		Campus	District	State
Attendance Rate (2016-17)	88.6%	93.0%	95.7%	Class Size Averages by Grade or Subject			
Enrollment by Race/Ethnicity				Secondary			
African American	1.0%	1.5%	12.6%	English/Language Arts	15.2	15.5	16.7
Hispanic	98.0%	97.4%	52.4%	Foreign Languages	17.2	20.0	18.6
White	0.4%	0.6%	27.8%	Mathematics	12.0	14.6	17.9
American Indian	0.1%	0.0%	0.4%	Science	11.2	14.8	19.0
Asian	0.2%	0.3%	4.4%	Social Studies	17.1	17.7	19.3
Pacific Islander	0.0%	0.0%	0.1%				
Two or More Races	0.3%	0.1%	2.3%				
Enrollment by Student Group							
Economically Disadvantaged	87.9%	93.2%	58.8%				
English Learners	7.8%	19.7%	18.8%				
Special Education	12.0%	10.0%	9.1%				
Mobility Rate (2016-17)	21.4%	24.0%	16.0%				

School Financial Information (2016-17)

Various financial indicators are reported for the campus, district, and state, where applicable, based on actual data from the prior year. For more information, see <http://tea.texas.gov/financialstandardreports/>.

	Campus	District	State		Campus	District	State
Instructional Staff Percent	n/a	59.8%	64.4%	Expenditures per Student			
Instructional Expenditure Ratio	n/a	59.4%	63.1%	Total Operating Expenditures	\$7,174	\$10,890	\$9,503
				Instruction	\$5,079	\$5,585	\$5,338
				Instructional Leadership	\$233	\$254	\$149
				School Leadership	\$606	\$629	\$555

		State	District	Campus	African American	Hispanic	White	American Indian	Asian	Pacific Islander	Two or More Races	Econ Disadv
STAAR Performance Rates at Approaches Grade Level or Above (All Grades Tested)												
All Subjects	2018	77%	59%	63%	*	63%	*	-	-	-	*	63%
	2017	75%	61%	59%	*	59%	*	*	*	-	*	58%
Reading	2018	74%	56%	50%	*	50%	*	-	-	-	*	50%
	2017	72%	56%	44%	*	44%	-	-	*	-	-	43%
Mathematics	2018	81%	66%	71%	*	70%	*	-	-	-	*	71%
	2017	79%	68%	68%	*	68%	-	-	*	-	-	68%
Science	2018	80%	62%	73%	*	73%	*	-	-	-	*	73%
	2017	79%	67%	73%	*	73%	-	-	*	-	-	72%
Social Studies	2018	78%	64%	86%	*	86%	-	-	-	-	*	86%
	2017	77%	64%	83%	*	83%	*	*	*	-	*	81%
STAAR Performance Rates at Meets Grade Level or Above (All Grades Tested)												
All Subjects	2018	48%	26%	29%	*	29%	*	-	-	-	*	29%
	2017	45%	26%	26%	*	26%	*	*	*	-	*	26%
Reading	2018	46%	25%	24%	*	24%	*	-	-	-	*	24%
	2017	44%	24%	21%	*	21%	-	-	*	-	-	20%
Mathematics	2018	50%	28%	28%	*	28%	*	-	-	-	*	30%
	2017	46%	30%	28%	*	27%	-	-	*	-	-	28%
Science	2018	51%	27%	28%	*	28%	*	-	-	-	*	27%
	2017	49%	30%	32%	*	32%	-	-	*	-	-	32%
Social Studies	2018	53%	32%	47%	*	47%	-	-	-	-	*	47%
	2017	49%	28%	36%	*	36%	*	*	*	-	*	35%
STAAR Performance Rates at Masters Grade Level (All Grades Tested)												
All Subjects	2018	22%	8%	6%	*	6%	*	-	-	-	*	6%
	2017	20%	8%	5%	*	5%	*	*	*	-	*	5%
Reading	2018	19%	7%	3%	*	3%	*	-	-	-	*	3%
	2017	19%	7%	3%	*	2%	-	-	*	-	-	2%
Mathematics	2018	24%	10%	7%	*	7%	*	-	-	-	*	7%
	2017	22%	11%	11%	*	11%	-	-	*	-	-	9%
Science	2018	23%	7%	4%	*	4%	*	-	-	-	*	4%
	2017	19%	8%	5%	*	6%	-	-	*	-	-	5%
Social Studies	2018	31%	13%	20%	*	20%	-	-	-	-	*	20%
	2017	27%	9%	9%	*	10%	*	*	*	-	*	8%
Academic Growth Score (All Grades Tested)												
All Subjects	2018	69	62	60	83	60	*	-	-	-	*	60
	2018	69	63	64	*	64	*	-	-	-	-	63
Mathematics	2018	70	60	55	*	55	*	-	-	-	*	56

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	State	District	Campus	African American	Hispanic	White	American Indian	Asian	Pacific Islander	Two or More Races	Econ Disadv
Annual Dropout Rate (Gr 9-12)											
2016-17	1.9%	2.1%	1.8%	5.3%	1.7%	5.9%	*	*	*	*	1.8%
2015-16	2.0%	2.7%	2.0%	0.0%	2.0%	0.0%	*	*	-	*	2.0%
4-Year Longitudinal Rate (Gr 9-12)											
Class of 2017											
Graduated	89.7%	90.7%	93.6%	*	93.8%	*	*	-	-	-	92.6%
Graduates, TxCHSE, & Cont	94.1%	92.0%	93.9%	*	94.1%	*	*	-	-	-	93.0%
Class of 2016											
Graduated	89.1%	83.6%	87.9%	*	87.6%	*	-	-	-	*	87.0%
Graduates, TxCHSE, & Cont	93.8%	87.4%	90.6%	*	90.4%	*	-	-	-	*	90.2%
5-Year Extended Longitudinal Rate (Gr 9-12)											
Class of 2016											
Graduated	91.6%	86.8%	90.2%	*	89.9%	*	-	-	-	*	89.3%
Graduates, TxCHSE, & Cont	93.4%	86.9%	90.2%	*	89.9%	*	-	-	-	*	89.3%
Class of 2015											
Graduated	91.3%	89.0%	91.8%	100.0%	91.5%	*	*	-	-	-	90.9%
Graduates, TxCHSE, & Cont	93.3%	89.7%	91.8%	100.0%	91.5%	*	*	-	-	-	90.9%
6-Year Extended Longitudinal Rate (Gr 9-12)											
Class of 2015											
Graduated	91.8%	90.0%	92.7%	100.0%	92.5%	*	*	-	-	-	91.9%
Graduates, TxCHSE, & Cont	93.3%	90.1%	92.7%	100.0%	92.5%	*	*	-	-	-	91.9%
Class of 2014											
Graduated	90.9%	87.6%	89.6%	40.0%	91.0%	*	*	*	-	-	89.8%
Graduates, TxCHSE, & Cont	92.8%	88.6%	90.3%	40.0%	91.7%	*	*	*	-	-	90.4%
4-Year Federal Graduation Rate Without Exclusions (Gr 9-12)											
Class of 2017	89.7%	87.3%	91.2%	*	91.3%	*	*	-	-	-	89.8%
Class of 2016	89.1%	82.3%	86.9%	*	86.6%	*	-	-	-	*	85.9%
RHSP/DAP Graduates (Longitudinal Rate)											
Class of 2017	88.5%	94.0%	95.7%	*	96.3%	*	-	-	-	-	95.2%
Class of 2016	87.4%	92.3%	94.7%	*	95.7%	*	-	-	-	*	94.7%
RHSP/DAP/FHSP-E/FHSP-DLA Graduates (Longitudinal Rate)											
Class of 2017	85.9%	91.3%	93.5%	*	94.1%	*	-	-	-	-	92.9%
Class of 2016	85.1%	90.9%	92.8%	*	94.0%	*	-	-	-	*	93.1%
College, Career, and Military Ready (Annual Graduates)											
2016-17	54.2%	29.7%	27.9%	*	28.2%	*	-	-	-	-	25.1%
SAT/ACT Results (Annual Graduates)											
Tested											
Class of 2017	73.5%	46.9%	49.4%	*	48.4%	*	-	-	-	-	50.4%
Class of 2016	71.6%	49.0%	50.8%	*	51.4%	*	-	-	-	*	52.8%
Average SAT Score											
Class of 2017	1019	894	870	*	873	*	-	-	-	-	871
Class of 2016	1375	1163	1145	-	1144	*	-	-	-	*	1151
Average ACT Score											
Class of 2017	20.3	16.0	16.1	*	16.2	-	-	-	-	-	15.6
Class of 2016	20.3	18.1	16.9	-	16.9	-	-	-	-	-	16.3

'?' Indicates that the data for this item were statistically improbable, or were reported outside a reasonable range.

'*' Indicates results are masked due to small numbers to protect student confidentiality.

'-' Indicates zero observations reported for this group.

'n/a' Indicates data reporting is not applicable for this group.

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DISTRICT OF INNOVATION PLAN

Edgewood ISD Mission Statement

Edgewood ISD provides an exceptional learning experience that engages, empowers, and prepares students to compete and reach their highest potential in an ever-changing World.

Edgewood ISD as a District of Innovation

I. Introduction

House Bill 1842, passed during the 84th Legislative Session, permits Texas public school districts to become Districts of Innovation and to obtain exemption from certain provisions of the Texas Education Code. On April 18, 2017 the Edgewood Independent School District's Board of Managers passed a resolution to initiate the Process of Designation as a District of Innovation, pursuant to Texas Education Code Chapter 12-A, in order to increase local control over District operations and to support innovation and local initiatives to improve educational outcomes for the benefit of students and the community.

On May 11, 2017, the Board of Managers held a Public Hearing to consider whether or not Edgewood ISD should develop a District of Innovation Plan. After hearing from the public, the Board of Managers approved the appointment of a Local Innovation Committee to develop a comprehensive District of Innovation plan. The Board of Managers recommended the District Education Improvement Committee (DEIC) comprise the Local Innovation Committee and recommended additional ad hoc members be added to ensure all campuses are represented. The Committee was comprised of district leaders representing a variety of roles and responsibilities.

The Committee met on May 31, 2017, June 6, 2017, and on June 21, 2017, to discuss and draft the Local Innovation Plan. Based on guidance provided by the Board of Managers and input from various District stakeholders, the Committee developed the plan. This plan is specific to the exemptions as outlined. The district intends to follow the Texas Education Code in all areas. The DEIC met on September 7, 2017 to approve the District of Innovation Plan. Minor revisions were added to clarify processes in the plan. The revised plan was taken to the DEIC on October 5, 2017 and approved. If at some point it is decided that changes or additional exemptions should be considered, as per the Districts of Innovation process, the district will reconvene the District Education Improvement Committee to explore the requested changes. The Board approved the Edgewood ISD District of Innovation Plan on November 28, 2017.

Under HB 1842, districts may identify certain requirements imposed by the Texas Education Code (TEC) "that inhibit the goals of the plan and from which the district should be exempted on adoption of the plan. . ." The Edgewood ISD Strategic Plan 2016-2021 demands innovative practices and opportunities for our students; therefore, Edgewood ISD seeks exemption from the following permissible provisions of the TEC as allowed in the statute.

II. TERM

The term of the Innovation Plan is for five years, unless terminated or amended earlier by the Board of Trustees in accordance with the law. The Committee will continually monitor the effectiveness of the Plan and recommend to the Board any suggested modifications to the Plan.

III. A COMPREHENSIVE EDUCATIONAL PROGRAM

The Plan's comprehensive educational program is guided by the Board's Vision, Mission, Shared Beliefs and Goals.

Vison Statement

For every child, success in life. Edgewood Proud!

Mission Statement

Edgewood ISD provides an exceptional learning experience that engages, empowers, and prepares students to compete and reach their highest potential in an ever-changing World.

Shared Beliefs

- All students have value and can be successful
- High expectations and positive relationships are vital for student success
- All stakeholders should inspire students to love learning & reach their personal goals
- Each student deserves a high quality, well-rounded, education (academic, social, and life skills)

Lone Star Governance - Student Outcome Goals

The percentage of students in grades K-3 who are reading on or above grade level will increase from 54% to 64% by the end of school year 2022 (Baseline measure May 2017).

The percentage of students in grades 3-8 who meet standard on reading STAAR will increase from 61% to 68% by the end of school year 2022 (Baseline - 2017 STAAR English, STAAR Spanish and STAAR Alternative 2).

The Four-Year Longitudinal Graduation Rate (Graduated, Continued in School, or Received GED) will increase from 87.4% (Class of 2016 reported in 2017) to 90.0% (Class of 2021 reported in 2022).

Strategic Plan Goals

Improve Literacy - All students will be literate in order to be contributing members of society.

College and Career Readiness - All EISD students will possess the skill sets necessary to be college and/or career ready

Stewardship - EISD will provide each student with an exceptional educational experience, so they will be a contributing citizen in the 21st century global marketplace

Graduation/Dropout Rate - Each student that enters EISD will graduate!

Attendance - Every student will intrinsically want to be physically and mentally in class

IV. THE INNOVATION PLAN

This plan is specific to the exemptions as outlined. The district intends to follow the Texas Education Code in all other areas. If at some point it is decided that changes or additional exemptions should be considered, as per the Districts of Innovation process, the district will reconvene the District Education Improvement Committee to explore the request.

Under HB 1842, districts may identify certain requirements imposed by the Texas Education Code (TEC) “that inhibit the goals of the plan and from which the district should be exempted on adoption of the plan. . .” The EISD Strategic Plan demands innovative practices and opportunities for our students, and therefore, EISD seeks exemption from the following permissible provisions of the TEC as allowed in the statute:

- Class Size Ratio
 - Minimum Minutes of Instruction
 - Teacher Certification
 - Uniform Start Date
-

Class Size Ratio

(EEB LEGAL) (Ed. Code 25.111) (Ed. Code 25.112) (Ed. Code 25.113)

Current Statute: Kindergarten - 4th Grade class sizes are to remain at or below a 22 student to 1 teacher ratio according to state law. When a class exceeds this limit, the district must complete a waiver with the Texas Education Agency. These waivers are completed at the start of a school year as well as anytime a child enrolls in an elementary school at a grade level where the ratio is already maintained according to staffing projections the previous year.

Proposed Flexibility: If the student/teacher ratio averaged across a grade level goes over the 22 student to 1 teacher, it must have teacher approval. The extended class minimum approval applies after the first four weeks of instruction. In the event a classroom exceeds the 22:1 ratio in grades K-4, campus and district administration in collaboration with the teacher would request an exemption from the Superintendent of Schools. The Superintendent will then report to the Board of Trustees the number of exemptions granted.

Rationale: Moving students during the year can be detrimental to the continuity and stability of their academic and emotional growth. EISD is required to seek a waiver each year to approve this practice that supports increased class size. In addition, flexibility around class size can be considered at the elementary level based on student need and teacher request.

Minimum Minutes of Instruction

(EC LEGAL & EB LEGAL) (Ed. Code 25.081)

Current Statute: House Bill (HB) 2610, passed by the 84th Texas Legislature, amends the Texas Education Code (TEC), §25.081, by striking language requiring 180 days of instruction and replacing this language with language requiring districts and charter schools to provide at least 75,600 minutes of instruction (including intermissions and recess). The bill also allows school districts and charter schools to add minutes as necessary to compensate for minutes of instruction lost due to school closures caused by disaster, flood, extreme weather conditions, fuel curtailment, or another calamity.

Proposed Flexibility: Edgewood ISD seeks exemption from the requirement that an instructional day must be at least 420 minutes/seven hours a day in length. Flexibility for the district to schedule half-days for the purpose of planning for student needs.

Rationale: Edgewood ISD seeks to expand or adjust school schedules to accommodate student course work needs. To meet the needs of students in special programs (i.e. Early College High School). Edgewood ISD seeks a later start or additional early release time to accommodate professional development/collaboration for teachers to provide sufficient time for teacher collaboration.

Teacher Certification

(DK LEGAL, DK LOCAL, DK EXHIBIT) (ED. Code 21.003)

Current Statute: In the event a district cannot locate a certified teacher for a position or a teacher is teaching a subject outside of their certification, the district must submit a request to the Texas Education Agency. TEA then approves or denies this request.

Proposed Flexibility: 21.003 certification required (for example, Career and Technical Education/Dual Credit/Early College High School courses); 21.0031 failure to obtain certification; contract void; 21.053 presentation and recording of certificate. The campus principal may submit to the Superintendent a request to allow a teacher to teach a course in a highly specialized or hard-to-fill area. The superintendent will make a determination as to whether the applicant is qualified to teach such a course or vocational skill through a local teaching certificate. Local teaching certificates will be for one year. The Superintendent will then report this action to the Board of Trustees. In the event that an employee seeks a position where they are not certified, they may request approval of a local teaching certificate based on district need/availability. Note that special education and bilingual teachers must continue to be certified.

Rationale: A lack of specialized courses and dual enrollment courses exist at the secondary level. The District shall make every effort to hire teachers with appropriate state certification. However, in hard-to-fill positions, the District shall be exempt from state certification requirements. All employees issued a local teaching certificate will be provided a comprehensive professional development plan to address the following: classroom management, TEKS, relationship building, as well as, all of the required professional development provided to new teachers.

Uniform School Start Date

(EB LEGAL) (Ed. Code 25.0811)

Current Statute: Students may not begin school before the 4th Monday of August. In the past, districts could apply for a waiver to start the school calendar earlier to meet the needs of the local community. This waiver opportunity was met with resistance from the Texas tourism groups who lobbied to have the practice ended, because they believed it was detrimental to the Texas tourism business. Therefore, several years ago the legislature took away all waivers and dictated that districts may not begin until the 4th Monday, with no exceptions.

Proposed Flexibility: To be able to start prior to the fourth Monday in August, but not earlier than the 2nd Monday, in order to have a balanced calendar for grade reporting and aligning to state assessments.

Rationale: Based on the current schedule, the fall semester ends in the middle of January. An earlier start will provide a balance between the fall and spring semesters. Ending the fall semester before the winter break will improve results due to extinction of knowledge over the winter break. This balance will also provide additional instructional time prior to state assessment administration. The additional time will increase time for intervention time. Families may save on utilities by having children in school. Better alignment with state testing calendar. Annual calendars be created to address each year.



Edgewood ISD Board/Superintendent Goals

Goal 1: Focus on Student Success

- The percent of students in grades K-3 reading on or above grade level will increase from 54% to 64% by June 2022 (baseline measure May 2017).
- The percent of students in grades 3 - Algebra 1 meeting standard on STAAR mathematics will increase from 66% to 76% by June 2023 (baseline measure - 2018 STAAR Mathematics).
- The College, Career and Military Readiness Scaled Score will increase from 61 to 82 by June 2023 (baseline measure Class of 2017 reported in 2018).
- The superintendent will provide the board with a comprehensive plan to develop and implement choice and innovative schools that follow a performance framework for Edgewood ISD.
- The superintendent will provide the board with a comprehensive advance academic services plan that develops National Merit Scholars in the district.

Goal 2: Focus on Students, Families and Community

- The superintendent will increase communication and visibility between parents, teachers, students and community, regarding the educational progress, school events and a comprehensive plan that addresses family engagement/resources and social services.
- The superintendent will provide the board with a comprehensive communications plan that supports the branding and marketing of the district.
- The superintendent will provide the board with a comprehensive plan that addresses safety and security services.

Goal 3: Focus on Operational Excellence

- The superintendent will provide the board with a status report on the strategic plan for Operational Excellence. The report will include specific data to demonstrate evidence of progress within each goal.
- The superintendent will provide the board with a new energy management plan.
- The superintendent will provide the board with a plan to repurpose any properties as part of the district System of Great Schools (SGS) framework.

Goal 4: Focus on Employees & Organizational Improvement

- The superintendent will create a handbook for use by principals across the district in order to have consistency on the campuses.
- The superintendent will survey staff to get feedback utilizing various employee satisfaction instruments.
- The superintendent will continue to develop and deploy a recruitment and induction process to attract and support new employees.
- The superintendent will continue to develop leadership advancement programs in order to grow our own leaders within the district.

Goal 5: Focus on Financial Stewardship

- The superintendent will present the board with a budget development process and timeline. The report will outline budget assumptions and priorities.
- The superintendent will present the board with a budget plan that maintains strong financial reserves and demonstrates sound fiscal responsibility.



Innovation Schools and Programs

Call for Schools

Resources

ACE Program

Edgewood ISD Innovation Zones

INNOVATION SCHOOLS AND PROGRAMS

[Edgewood ISD](#) / [About EISD](#) / [Schools of Innovation](#) / Innovation Schools and Programs



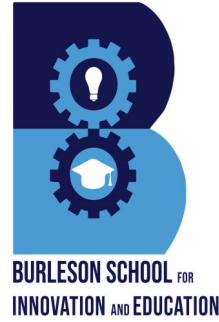
- Early Childhood Innovation Zone
- Elementary School
- Pre-K 4 SA Curriculum
- Dual-Language



- STEAM Innovation Zone
- Middle School
- Project Lead the Way
- Career and Technical Education (CTE)



- Leadership Innovation Zone
- Opens Fall 2020 to 5th Grade
- All Girls/ Single Gender School
- Community Build



- Public Service Innovation Zone
- Opens Fall 2020 to 6th-8th Grade
- Partnership with Texas A&M- SA
- Accelerated Campus Excellence (ACE)

- Early Childhood Innovation Zone
- Opens Fall 2020 to PK-2nd Grade
- Full Day Prekindergarten
- Accelerated Campus Excellence (ACE)

- Special Education
- Serves 18-22 year
- Partnership with A&M- SA
- Career and College Assistance

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EDGEWOOD

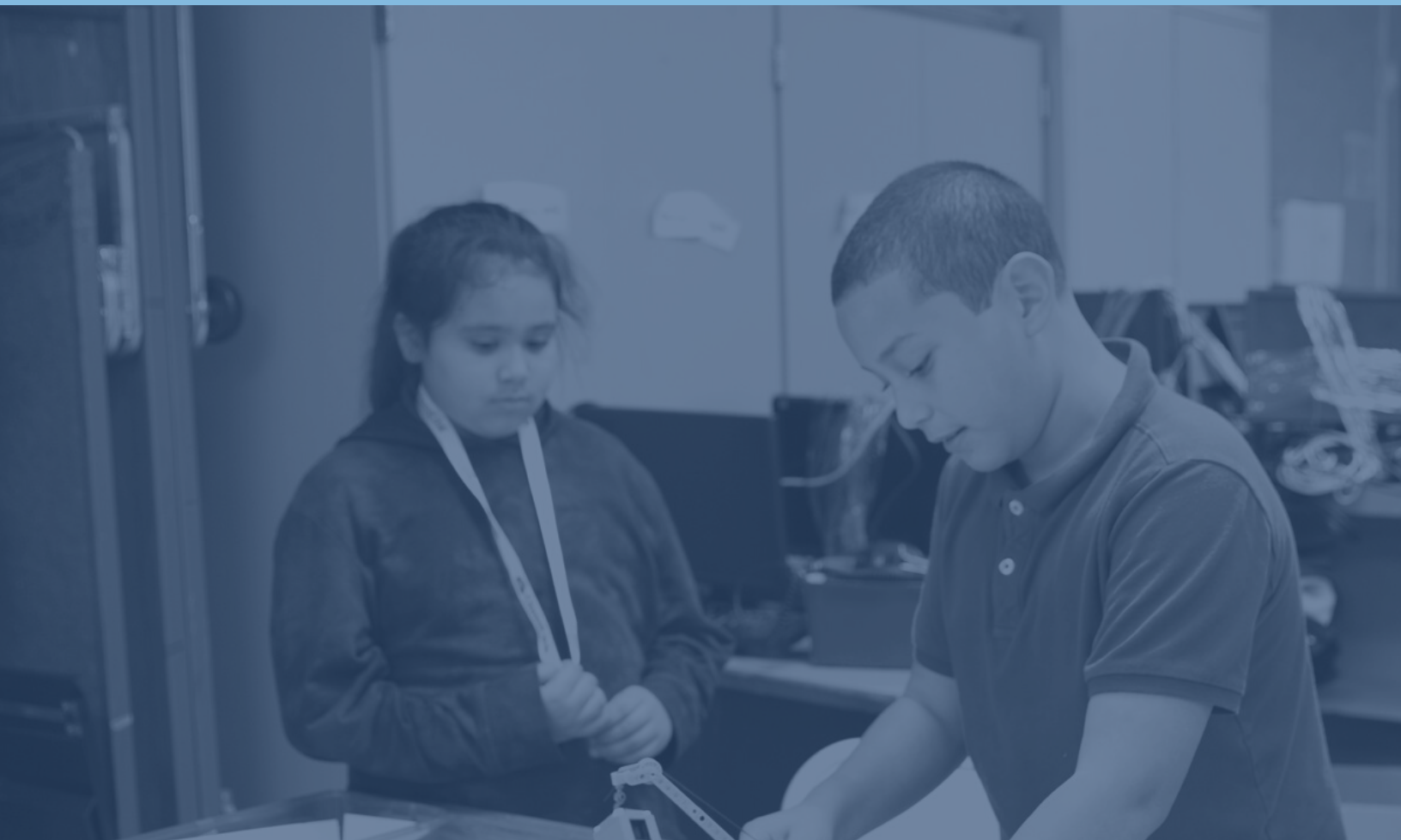
INDEPENDENT ♦ SCHOOL ♦ DISTRICT

SCHOOLS OF INNOVATION

ENGAGE ♦ TRANSFORM ♦ INSPIRE



NEW TECH STEAM @ WINSTON INTERMEDIATE



96%

Hispanic

2%

African
American

79%

At Risk

19%

ELLs

96%

Economically
Disadvantaged

VISION 2025

DISTRICT MISSION

Edgewood ISD provides an exceptional learning experience that engages, empowers, and prepares students to compete and reach their highest potential in an ever changing world.

DISTRICT VISION

For every child, success in life. Edgewood Proud!

CORE VALUES

- Professionalism
- Accountability
- Communication

DISTRICT OUTCOME

To graduate all students career-, college- or military-ready per their expected date of graduation.

DISTRICT GOALS

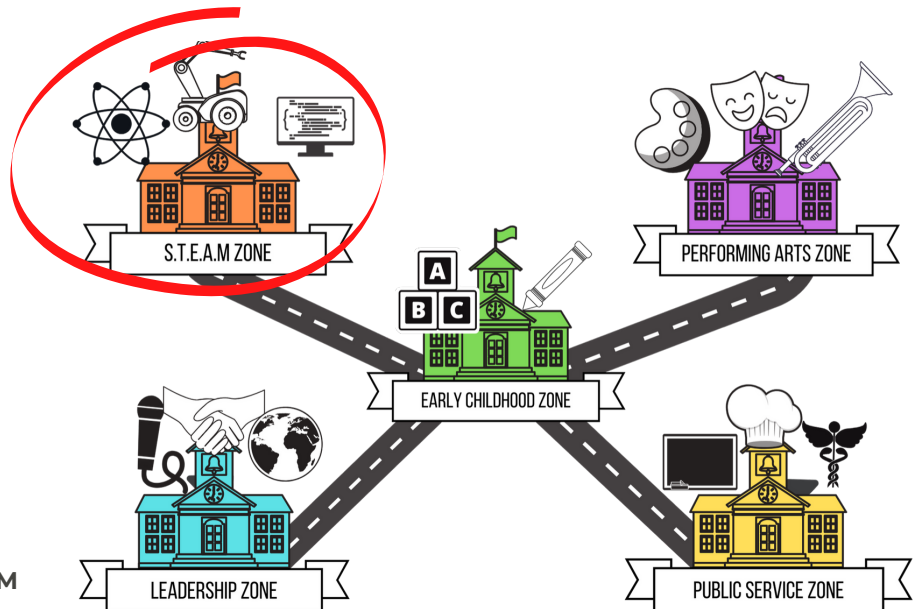
1. Focus on Student Success
2. Focus on Students, Families, & Community
3. Focus on Operational Excellence
4. Focus on Employee & Organizational Improvement
5. Focus on Financial Stewardship

INNOVATION ZONES



OUR INNOVATION FOCUS

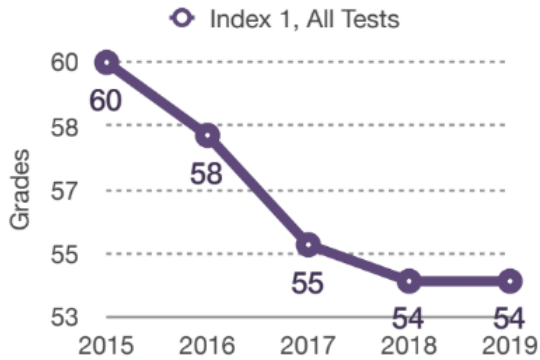
Winston will join the STEAM Innovation Zone in August 2021.



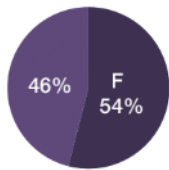


QUICK FACTS

TEA ACCOUNTABILITY

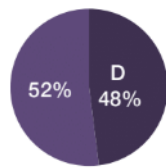


2019 Index 1

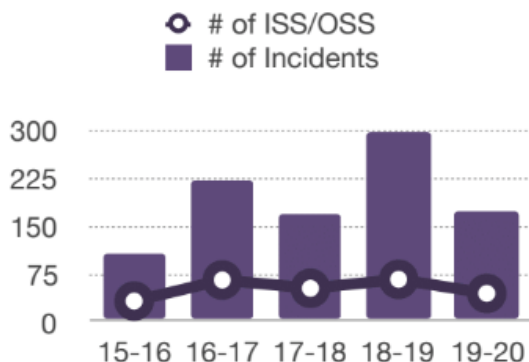


2019 Rating

2020 Expected



DISCIPLINE



PERSONNEL

In the last seven academic years:

- Winston has had 4 campus principals
 - The current principal was assigned to the campus in August 2019
- Winston has averaged the same educator turnover as other EISD campuses
- Currently 30 classroom teachers:
 - 11 have 0-3 years of teaching experience
 - 10 have 4-10 years of teaching experience

FINANCIALS

- Current ADA: 398
- Projected Enrollment for 2020-2021: 375
- Per pupil allotment projections for 2020-2021: \$6,153
- SB 1882 projected allotment: \$331,676
- District percentage retained: %8.9
- All financial data are based on current projections, are subject to change, and are for estimation purposes only

ATTENDANCE

- Educator Attendance Rate: 92% as of 03/02/19
- Student Attendance Rate: 93.4%



CURRICULUM & INSTRUCTION

NEW TECH NETWORK MODEL

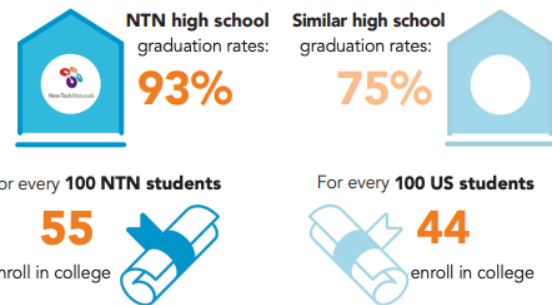
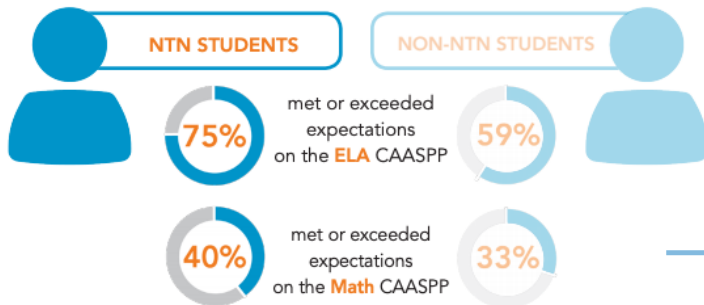


New Tech Network

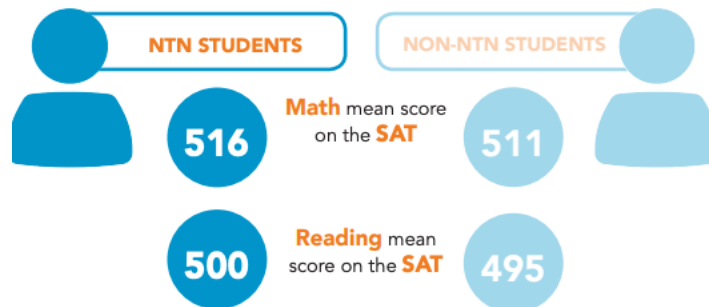
THE PEER-REVIEWED EVIDENCE OF NTN IMPACT

NTN STUDENTS OUTPERFORM ON STATE EXAMS, EXTERNAL ASSESSMENTS, AND ACT/SAT

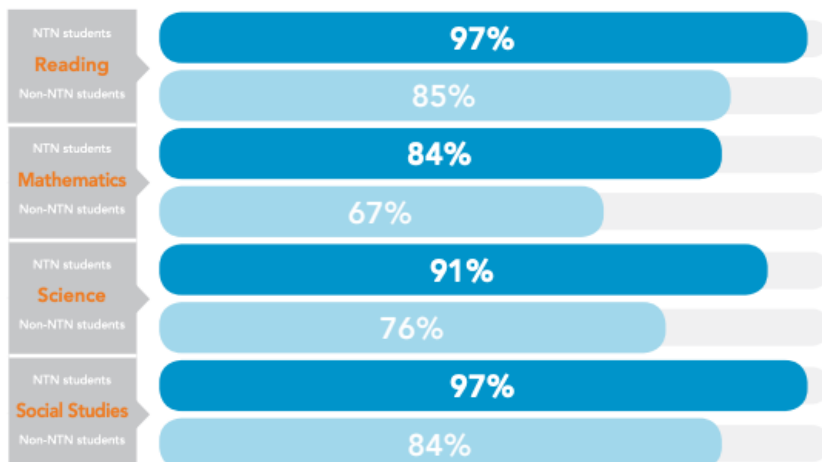
Students in a New Tech case study school in CA performed better than the statewide average on both the Math and ELA CAASPP exams. Scores were compared for 11th grade students during the 2015-2016 school year and 56% of the NTN students receive free or reduced lunch.⁵



SAT scores were available for 81 out of 116 high school seniors at the CA case study site in 2017. **NTN students performed better** than the national average on both the Math and Reading components of the SAT.⁵



In another case study site in Texas the percentage of students "Meeting Standard" on the 2010-2011 TAKS assessments for all grades was **higher for the NTN students** compared to the non-NTN students in all subjects:⁷



OTHER INSTRUCTIONAL CONSIDERATIONS

- 3-5 Intermediate School
- STEAM Zone
- Blended Learning
- New Tech PBL Instructional Model
- 2-way Dual Language



PARTNER EXPECTATIONS

EXPECTATIONS FOR 1882 OPERATING PARTNERS

- Retention of all staff as Edgewood employees
- Percent retention of funds: %8.9
- Adherence to School Performance framework
- Open Enrollment with no academic entrance criteria
- Operating partner must have an employee assigned to the campus that serves daily
- Principal manages the entire building during rollout
- New Tech PBL Instructional mode
- 3-5 Intermediate STEAM School
- Partnership Agreement is Standardized with all Operating Partners

READY TO START?

To apply for an SB 1882 Partnership with EISD please visit our website www.eisd.net/schools-of-innovation

Contact Christopher Nester, Chief Transformation Officer at Edgewood ISD, for further information.

(210) 444-4500 Christopher.Nester@eisd.net

IMPORTANT QUALITIES



EDGEWOOD

INDEPENDENT ♦ SCHOOL ♦ DISTRICT

SCHOOLS OF INNOVATION

ENGAGE ♦ TRANSFORM ♦ INSPIRE



NEW TECH STEAM @ JOHN F. KENNEDY HIGH



98%

Hispanic

1%

African
American

80%

At Risk

10%

ELLs

92%

Economically
Disadvantaged

VISION 2025

DISTRICT MISSION

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DISTRICT VISION

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CORE VALUES

- Professionalism
- Accountability
- Communication

DISTRICT OUTCOME

To graduate all students career-, college- or military-ready per their expected date of graduation.

DISTRICT GOALS

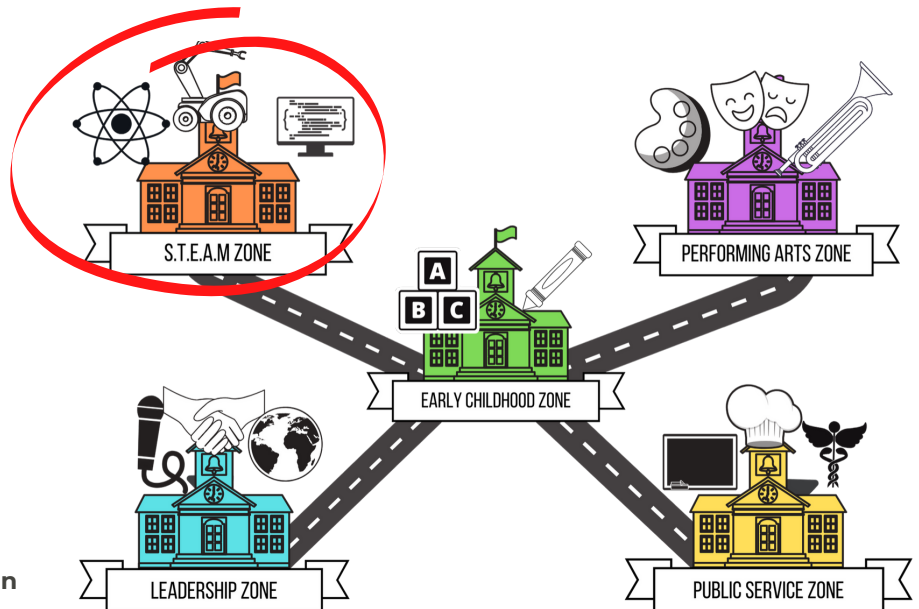
1. Focus on Student Success
2. Focus on Students, Families, & Community
3. Focus on Operational Excellence
4. Focus on Employee & Organizational Improvement
5. Focus on Financial Stewardship

INNOVATION ZONES



OUR INNOVATION FOCUS

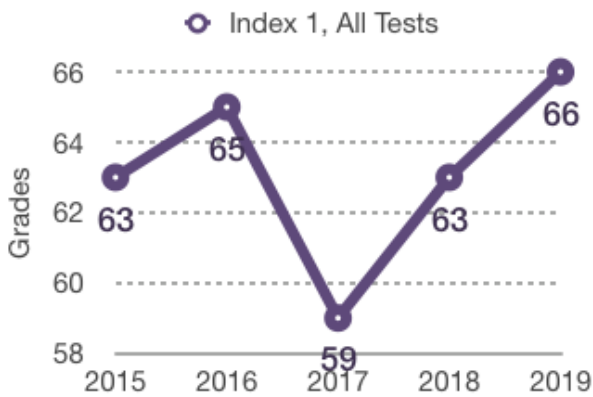
JFK will join the STEAM Innovation Zone in August 2021.





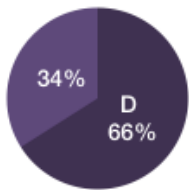
QUICK FACTS

TEA ACCOUNTABILITY

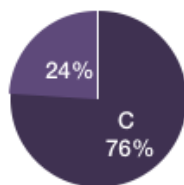
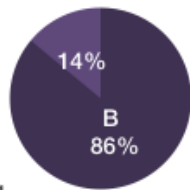


2019 Index 1

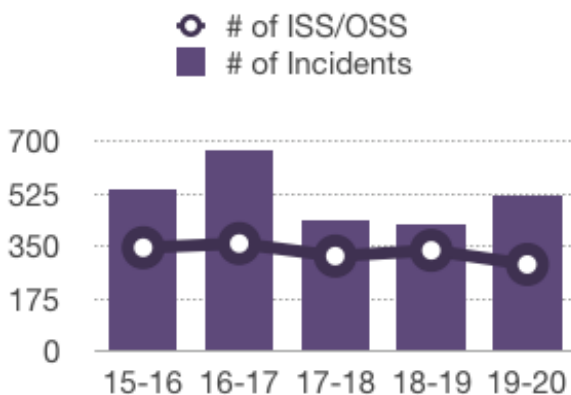
2020 Expected



2019 Rating



DISCIPLINE



PERSONNEL

In the last seven academic years:

- JFK has had 3 campus principals
 - The current principal was assigned to the campus in August 2018.
- JFK has averaged the same educator turnover as other EISD campuses
- Currently 65 classroom teachers:
 - 9 have 0-3 years of teaching experience
 - 23 have 3-10 years of teaching experience

FINANCIALS

- Current ADA: 923
- Projected Enrollment for 2020-2021: 900
- Per pupil allotment projections for 2020-2021: \$6,153
- SB 1882 projected allotment: \$435,994
- District percentage retained: 8.9%

ATTENDANCE

- Educator Attendance Rate: 83% as of 03/02/20
- Student Attendance Rate: 91%



CURRICULUM & INSTRUCTION

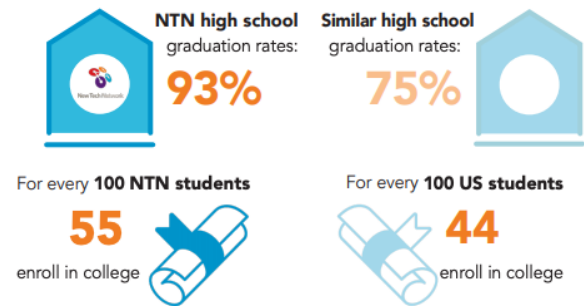
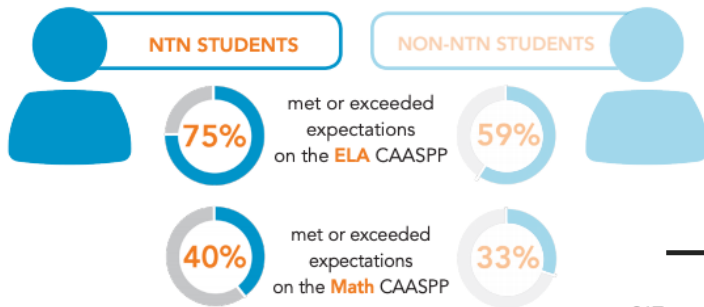
NEW TECH NETWORK MODEL



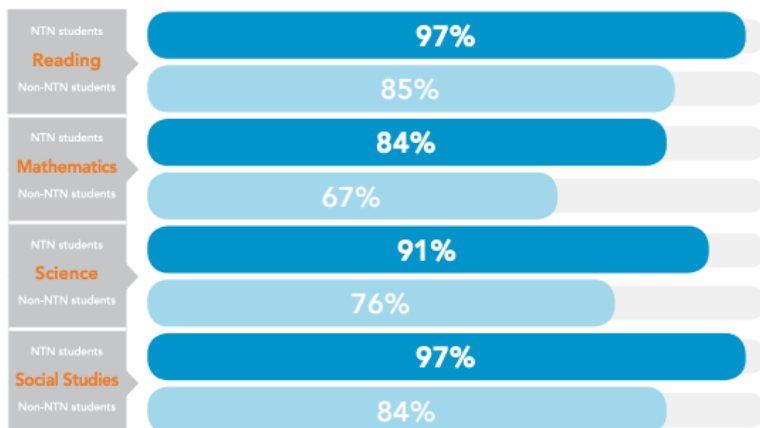
THE PEER-REVIEWED EVIDENCE OF NTN IMPACT

NTN STUDENTS OUTPERFORM ON STATE EXAMS, EXTERNAL ASSESSMENTS, AND ACT/SAT

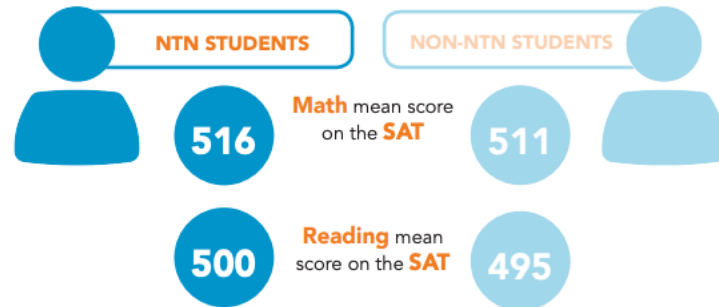
Students in a New Tech case study school in CA performed better than the statewide average on both the Math and ELA CAASPP exams. Scores were compared for 11th grade students during the 2015-2016 school year and 56% of the NTN students receive free or reduced lunch.⁵



In another case study site in Texas the percentage of students "Meeting Standard" on the 2010-2011 TAKS assessments for all grades was **higher for the NTN students** compared to the non-NTN students in all subjects:⁷



SAT scores were available for 81 out of 116 high school seniors at the CA case study site in 2017. **NTN students performed better** than the national average on both the Math and Reading components of the SAT.⁵



OTHER INSTRUCTIONAL CONSIDERATIONS

- 9-12 High School
- STEAM Zone
- P-TECH: Aerospace, CyberSecurity, Advanced Manufacturing, Criminal Justice
- New Tech PBL Instructional Model



PARTNER EXPECTATIONS

EXPECTATIONS FOR 1882 OPERATING PARTNERS

- Retention of all staff as Edgewood employees
- Percent retention of SB 1882 funds:
- Adherence to School Performance framework
- Open Enrollment with no academic entrance criteria
- Operating partner must have an employee assigned to the campus that serves daily.
- Principal manages the entire building during rollout
- New Tech in grades 2-5

READY TO START?

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(210) 444-4500 Christopher.Nester@eisd.net

IMPORTANT QUALITIES



LEADERSHIP EXCELLENCE



SOCIAL & EMOTIONAL LEARNING SUPPORT



STRATEGIC STAFFING



FAMILY & COMMUNITY EMPOWERMENT



SCHOOL DESIGN



INSTRUCTIONAL EXCELLENCE

EDGEWOOD

INDEPENDENT ♦ SCHOOL ♦ DISTRICT

SCHOOLS OF INNOVATION

ENGAGE ♦ TRANSFORM ♦ INSPIRE



INTERNATIONAL BACCALAUREATE @ CISNEROS LEADERSHIP SCHOOL FOR BOYS



99%

Hispanic

1%

African
American

67%

At Risk

28%

ELLs

93%

Economically
Disadvantaged

VISION 2025

DISTRICT MISSION

Edgewood ISD provides an exceptional learning experience that engages, empowers, and prepares students to compete and reach their highest potential in an ever changing world.

DISTRICT VISION

For every child, success in life. Edgewood Proud!

CORE VALUES

- Professionalism
- Accountability
- Communication

DISTRICT OUTCOME

To graduate all students career-, college- or military-ready per their expected date of graduation.

DISTRICT GOALS

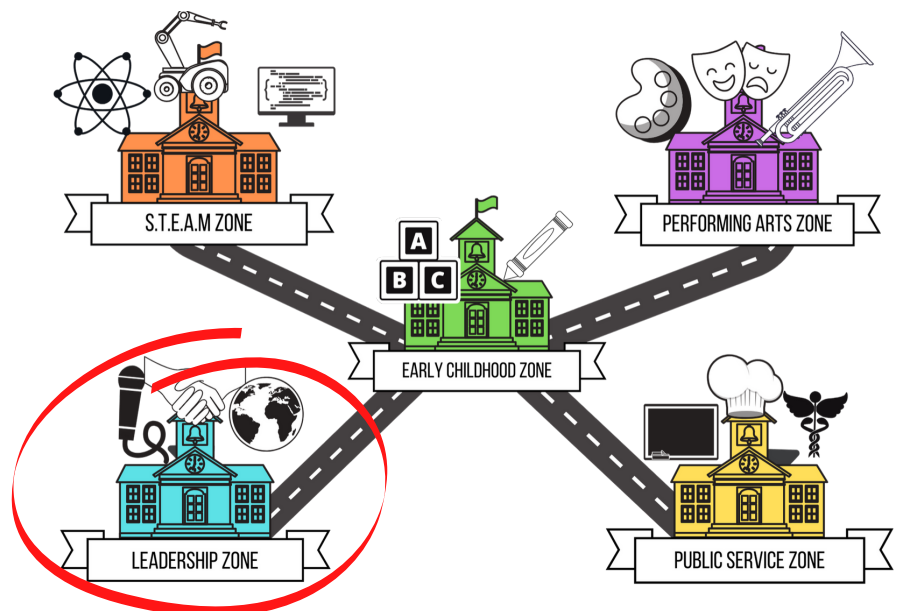
1. Focus on Student Success
2. Focus on Students, Families, & Community
3. Focus on Operational Excellence
4. Focus on Employee & Organizational Improvement
5. Focus on Financial Stewardship

INNOVATION ZONES



OUR INNOVATION FOCUS

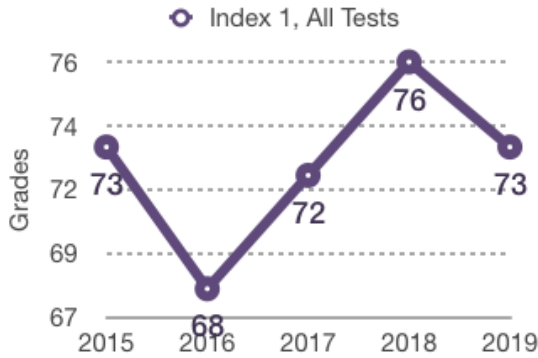
Cisneros will join the Leadership Innovation Zone in August 2021.





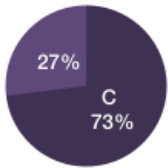
QUICK FACTS

TEA ACCOUNTABILITY

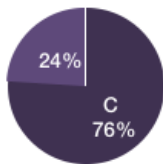
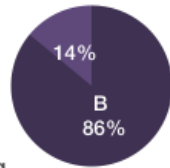


2019 Index 1

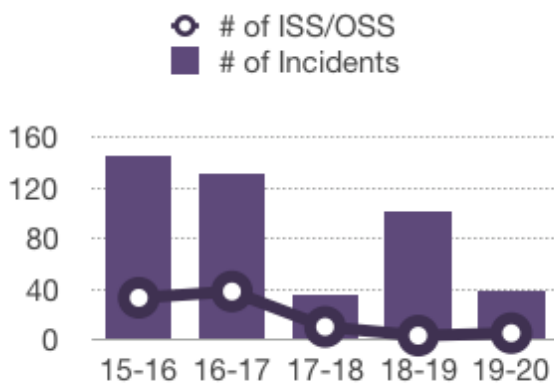
2020 Expected



2019 Rating



DISCIPLINE



PERSONNEL

In the last seven academic years:

- Cisneros has had 2 campus principals
 - The current principal was assigned to the campus for the past 2 years
- Cisneros has averaged less educator turnover as other EISD campuses
- Currently 33 classroom teachers:
 - 1 has 0-3 years of teaching experience
 - 7 have 4-10 years of teaching experience

FINANCIALS

- Current ADA: 474
- Projected Enrollment for 2020-2021: 450
- Per pupil allotment projections for 2020-2021: \$6,153
- SB 1882 projected allotment: \$402,298
- District percentage retained: 8.9%
- All financial data are based on current projections, are subject to change, and are for estimation purposes only.

ATTENDANCE

- Educator Attendance Rate: 92% as of 03/02/20
- Student Attendance Rate: 95%



CURRICULUM & INSTRUCTION

INTERNATIONAL BACCALAUREATE (IB) MODEL



International Baccalaureate (IB) Model to support the development of scholars exhibiting the following learner profile:

IB learner profile

- The IB learner profile is the IB mission statement translated into a set of learning outcomes for the 21st century
- As IB learners we strive to be:
 - inquirers
 - knowledgeable
 - thinkers
 - communicators
 - principled
 - open-minded
 - caring
 - risk-takers
 - balanced
 - reflective



International Baccalaureate
Baccalauréat International
Bachillerato Internacional

© International Baccalaureate Organization 2014

OTHER INSTRUCTIONAL CONSIDERATIONS

- All-Boys School
- Blended Learning
- K-8 after a 4 year rollout
- 2-way Dual Language



PARTNER EXPECTATIONS

EXPECTATIONS FOR 1882 OPERATING PARTNERS

- Retention of all staff as Edgewood employees
- Percent retention of funds: 8.9%
- Adherence to School Performance framework
- Open Enrollment with no academic entrance criteria
- Operating partner must have an employee assigned to the campus that serves daily
- Principal manages the entire building during rollout
- International Baccalaureate Instructional model
- K-8 Boys Leadership School
- Partnership Agreement is Standardized with all Operating Partners

READY TO START?

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(210) 444-4500 Christopher.Nester@eisd.net

IMPORTANT QUALITIES

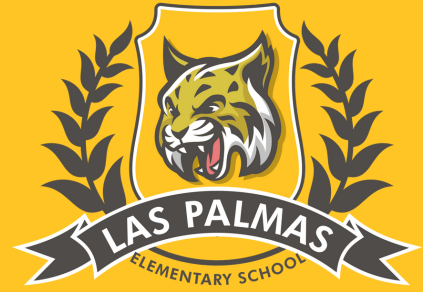


EDGEWOOD

INDEPENDENT ♦ SCHOOL ♦ DISTRICT

SCHOOLS OF INNOVATION

ENGAGE ♦ TRANSFORM ♦ INSPIRE



INTERNATIONAL BACCALAUREATE @ LAS PALMAS LEADERSHIP SCHOOL FOR GIRLS



99%

Hispanic

1%

African
American

79%

At Risk

20%

ELLs

96%

Economically
Disadvantaged

VISION 2025

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CORE VALUES

- Professionalism
- Accountability
- Communication

DISTRICT OUTCOME

To graduate all students career-, college- or military-ready per their expected date of graduation.

DISTRICT GOALS

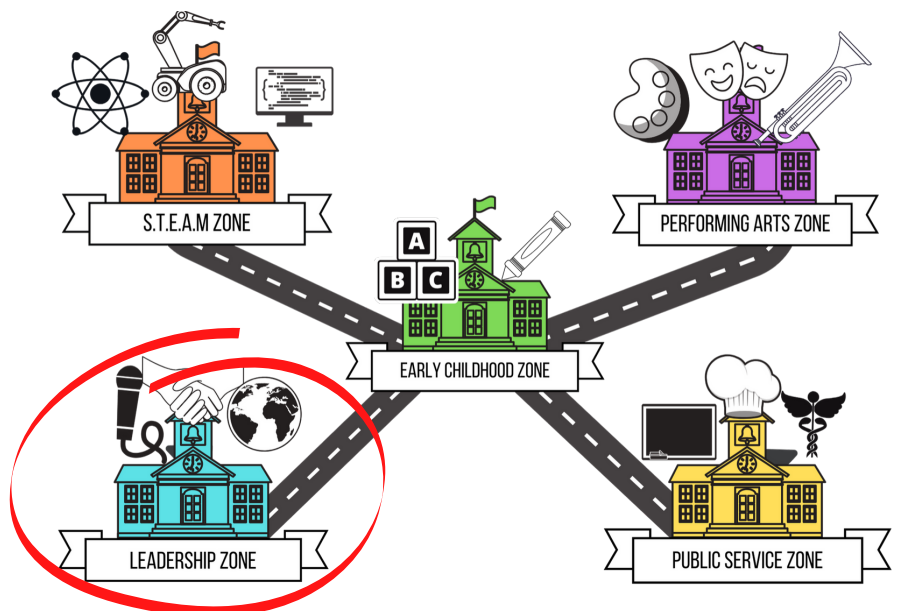
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3. Focus on Operational Excellence
4. Focus on Employee & Organizational Improvement
5. Focus on Financial Stewardship

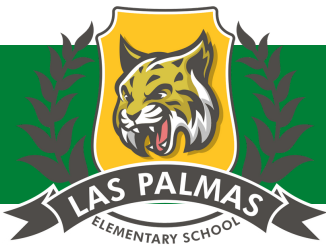
INNOVATION ZONES



OUR INNOVATION FOCUS

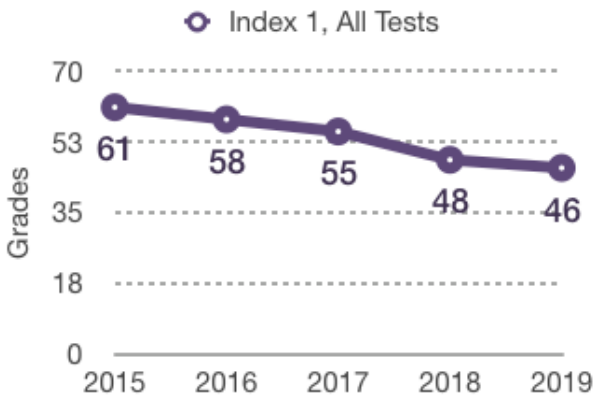
Las Palmas will join the Leadership Innovation Zone in August 2020.





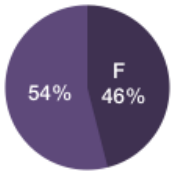
QUICK FACTS

TEA ACCOUNTABILITY

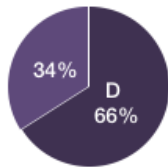
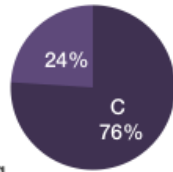


2019 Index 1

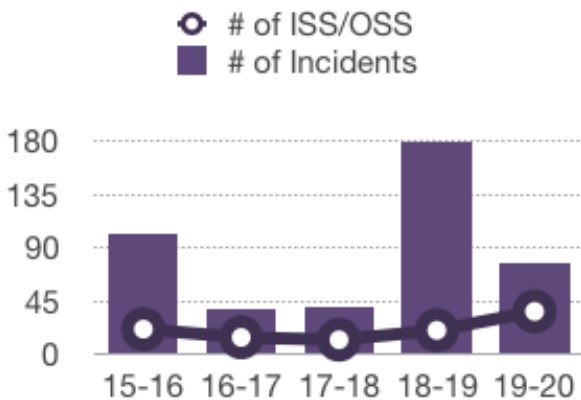
2020 Expected



2019 Rating



DISCIPLINE



PERSONNEL

In the last seven academic years:

- Las Palmas has had 2 campus principals
 - The current principal was assigned to the campus for the past 4 years
- Las Palmas has averaged similar educator turnover as other EISD campuses
- Currently 27 classroom teachers:
 - 5 has 0-3 years of teaching experience
 - 10 have 4-10 years of teaching experience

FINANCIALS

- Current ADA: 422
- Projected Enrollment for 2020-2021: 400
- Per pupil allotment projections for 2020-2021: \$6,153
- SB 1882 projected allotment: \$357,607
- District percentage retained: %8.9
- All financial data are based on current projections, are subject to change, and are for estimation purposes only

ATTENDANCE

- Educator Attendance Rate: 88% as of 03/02/20
- Student Attendance Rate: 94.2%



CURRICULUM & INSTRUCTION

INTERNATIONAL BACCALAUREATE (IB) MODEL



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 - knowledgeable
 - thinkers
 - communicators
 - principled
 - open-minded
 - caring
 - risk-takers
 - balanced
 - reflective



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OTHER INSTRUCTIONAL CONSIDERATIONS

- All-Girls School
- K-8 after a 4 year rollout
- Blended Learning
- Partnership with Girl Scouts and Girls Inc.
- 2-way Dual Language



PARTNER EXPECTATIONS

EXPECTATIONS FOR 1882 OPERATING PARTNERS

- Retention of all staff as Edgewood employees
- Percent retention of funds: 8.9%
- Adherence to School Performance framework
- Open Enrollment with no academic entrance criteria
- Operating partner must have an employee assigned to the campus that serves daily
- Principal manages the entire building during rollout
- International Baccalaureate Instructional model
- K-8 Girls Leadership School
- Partnership Agreement is Standardized with all Operating Partners

READY TO START?

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IMPORTANT QUALITIES

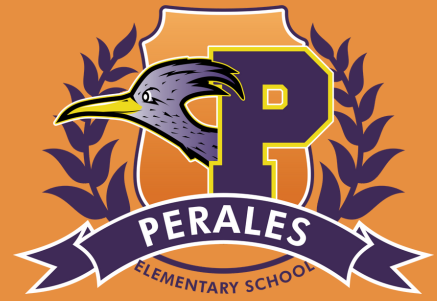


EDGEWOOD

INDEPENDENT ♦ SCHOOL ♦ DISTRICT

SCHOOLS OF INNOVATION

ENGAGE ♦ TRANSFORM ♦ INSPIRE



NEW TECH STEAM @ PERALES ELEMENTARY



97%

Hispanic

3%

African
American

70%

At Risk

18%

ELLs

95%

Economically
Disadvantaged

VISION 2025

DISTRICT MISSION

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DISTRICT VISION

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CORE VALUES

- Professionalism
- Accountability
- Communication

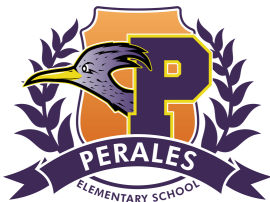
DISTRICT OUTCOME

To graduate all students career-, college- or military-ready per their expected date of graduation.

DISTRICT GOALS

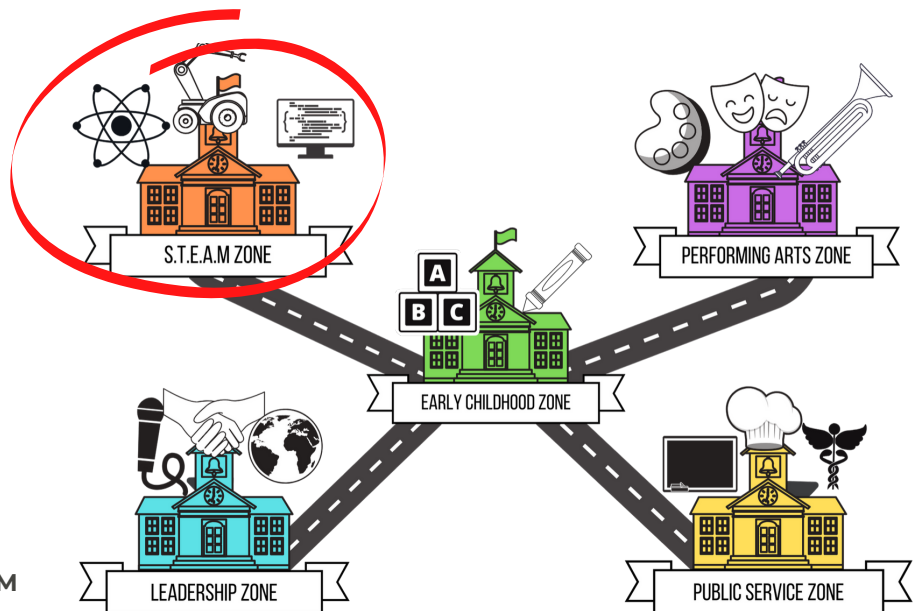
1. Focus on Student Success
2. Focus on Students, Families, & Community
3. Focus on Operational Excellence
4. Focus on Employee & Organizational Improvement
5. Focus on Financial Stewardship

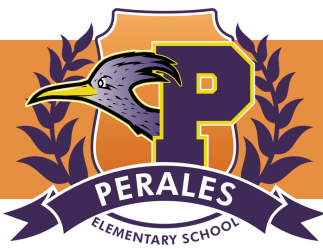
INNOVATION ZONES



OUR INNOVATION FOCUS

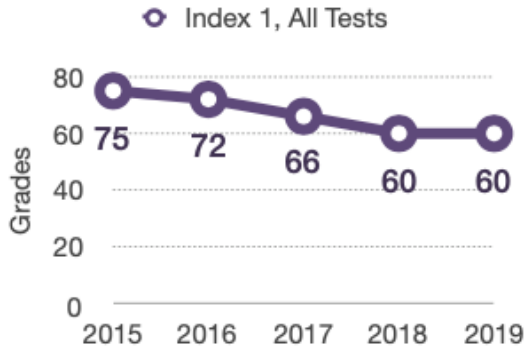
Perales will join the STEAM Innovation Zone in August 2020.



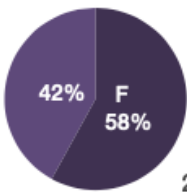


QUICK FACTS

TEA ACCOUNTABILITY

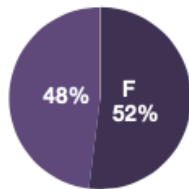
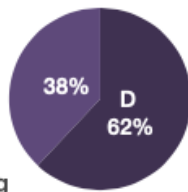


2019 Index 1

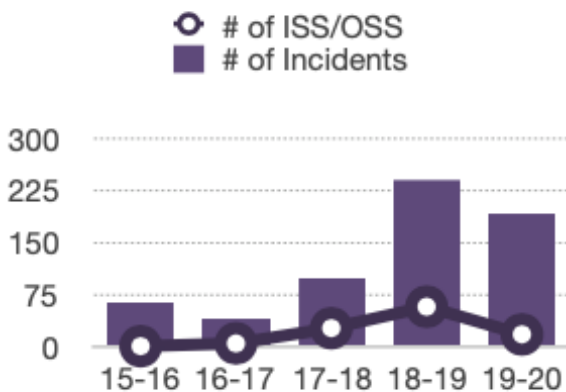


2019 Rating

2020 Expected



DISCIPLINE



PERSONNEL

In the last seven academic years:

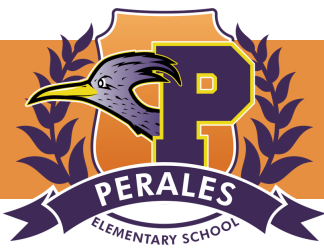
- Perales has had 3 campus principals
 - The current principal was assigned to the campus for the past 4 years
- Perales has averaged less educator turnover as other EISD campuses
- Currently 31 classroom teachers:
 - 3 have 0-3 years of teaching experience
 - 11 have 3-10 years of teaching experience

FINANCIALS

- Current ADA weights: 173.6
- Projected Enrollment for 2020-2021:
- Per pupil allotment projections for 2020-2021: \$6,153
- SB 1882 projected allotment: \$377,559
- District SB 1882 percentage: 8.9%

ATTENDANCE

- Educator Attendance Rate: 91% as of 03/02/20
- Student Attendance Rate: 94.1%



CURRICULUM & INSTRUCTION

NEW TECH NETWORK MODEL

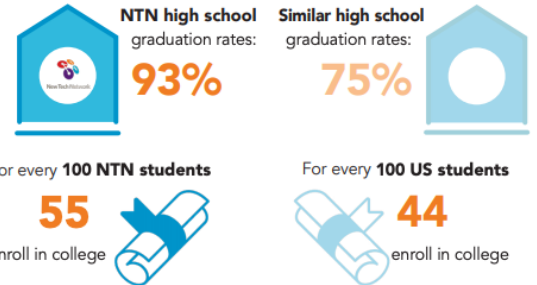
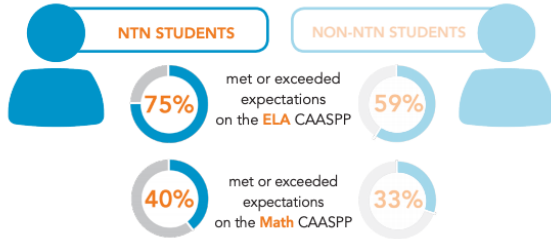


New Tech Network

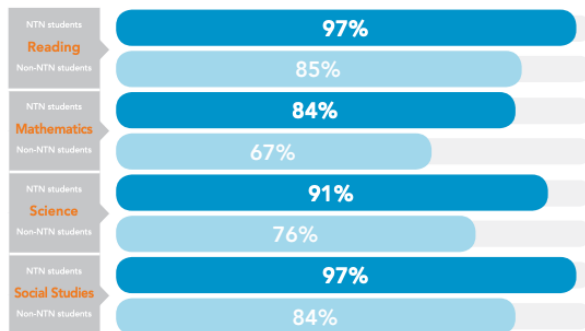
THE PEER-REVIEWED EVIDENCE OF NTN IMPACT

NTN STUDENTS OUTPERFORM ON STATE EXAMS, EXTERNAL ASSESSMENTS, AND ACT/SAT

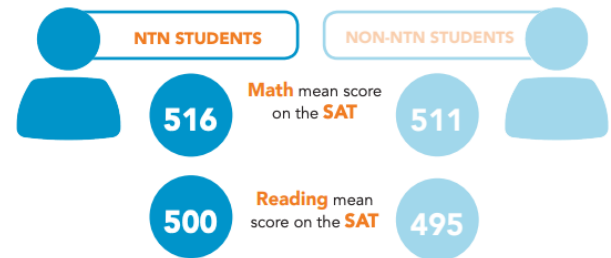
Students in a New Tech case study school in CA performed better than the statewide average on both the Math and ELA CAASPP exams. Scores were compared for 11th grade students during the 2015-2016 school year and 56% of the NTN students receive free or reduced lunch.⁵



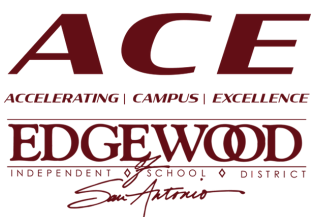
In another case study site in Texas the percentage of students "Meeting Standard" on the 2010-2011 TAKS assessments for all grades was **higher for the NTN students** compared to the non-NTN students in all subjects:⁷



SAT scores were available for 81 out of 116 high school seniors at the CA case study site in 2017. **NTN students performed better** than the national average on both the Math and Reading components of the SAT.⁸



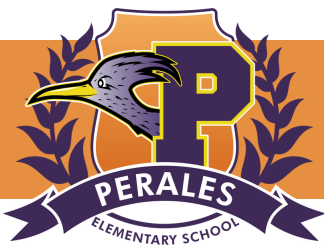
ACCELERATING CAMPUS EXCELLENCE (ACE) MODEL



Perales Elementary is one of our ACE campuses in Edgewood ISD. This commitment has been made to exist through the 2022-2023 school year. For more information, please visit our [ACE](#) webpage.

OTHER INSTRUCTIONAL CONSIDERATIONS

- ▶ Pre-K-5 Elementary School
- ▶ STEAM Zone
- ▶ New Tech PBL Instructional Model



PARTNER EXPECTATIONS

EXPECTATIONS FOR 1882 OPERATING PARTNERS

- Retention of all staff as Edgewood employees
- Percent retention of SB 1882 funds:
- Adherence to School Performance framework
- Open Enrollment with no academic entrance criteria
- Operating partner must have an employee assigned to the campus that serves daily.
- Principal manages the entire building during rollout
- New Tech in grades 2-5

READY TO START?

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SCHOOLS OF INNOVATION

ENGAGE ♦ TRANSFORM ♦ INSPIRE



FINE ARTS ACADEMY @ STAFFORD ELEMENTARY



97%

Hispanic

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- Accountability
- Communication

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DISTRICT GOALS

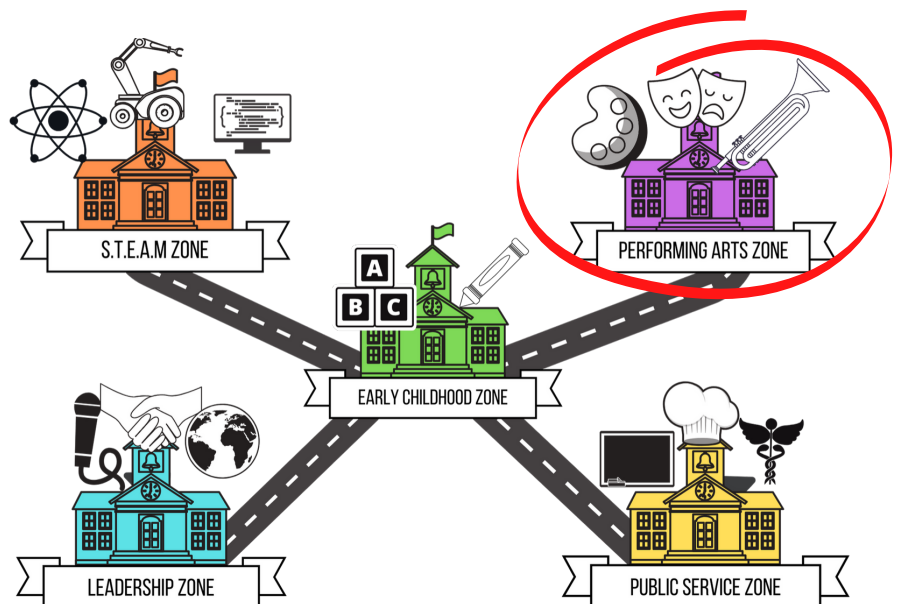
1. Focus on Student Success
2. Focus on Students, Families, & Community
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INNOVATION ZONES



OUR INNOVATION FOCUS

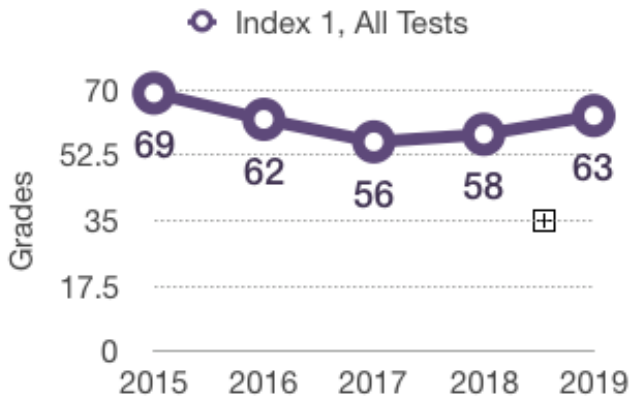
Stafford will join the Performing Arts Innovation Zone in August 2021.



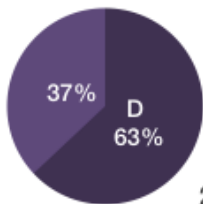


QUICK FACTS

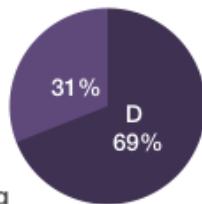
TEA ACCOUNTABILITY



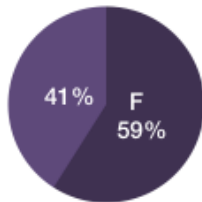
2019 Index 1



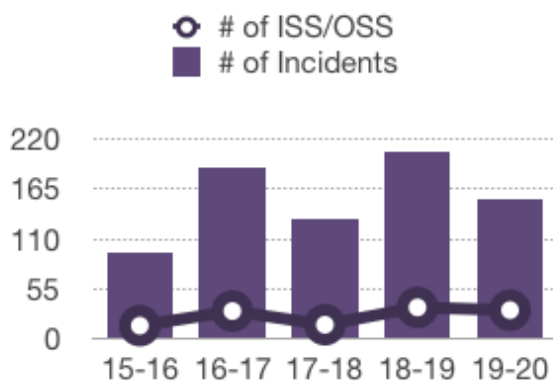
2020 Expected



2019 Rating



DISCIPLINE



PERSONNEL

In the last seven academic years:

- Winston has had 4 campus principals
 - The current principal has been assigned for the past 2 years
- Winston has averaged less educator turnover as other EISD campuses
- Currently 24 classroom teachers:
 - 5 have 0-3 years of teaching experience
 - 11 have 4-10 years of teaching experience

FINANCIALS

- Current ADA weights: 466
- Projected Enrollment for 2020-2021: 450
- Per pupil allotment projections for 2020-2021: \$6,153
- SB 1882 projected allotment: \$405,233
- District SB 1882 percentage: 8.9%
- All financial data are based on current projections, are subject to change, and are for estimation purposes

ATTENDANCE

- Educator Attendance Rate: 89% as of 03/02/19
- Student Attendance Rate: 95%



CURRICULUM & INSTRUCTION

NEW TECH NETWORK MODEL

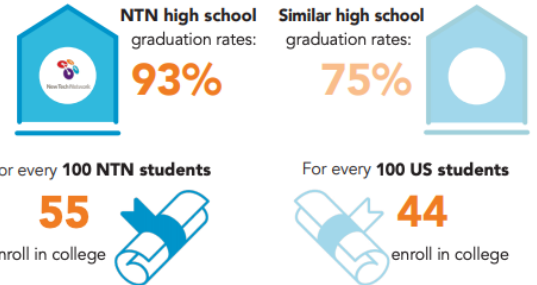
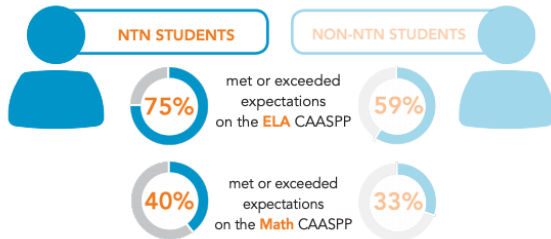


New Tech Network

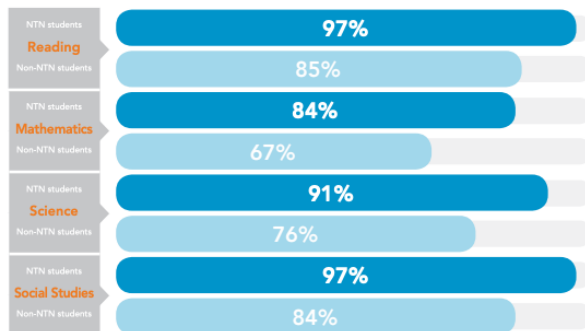
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NTN STUDENTS OUTPERFORM ON STATE EXAMS, EXTERNAL ASSESSMENTS, AND ACT/SAT

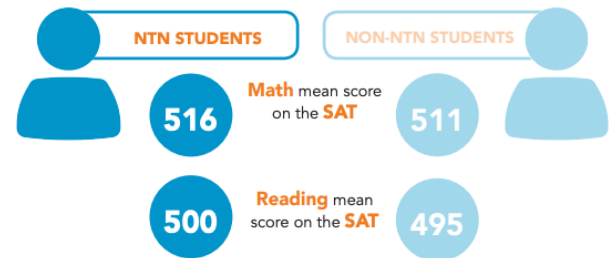
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SAT scores were available for 81 out of 116 high school seniors at the CA case study site in 2017. **NTN students performed better** than the national average on both the Math and Reading components of the SAT.⁸



The five phases of the design process:

<p>1 DISCOVERY</p> <p>I have a challenge. How do I approach it?</p>	<p>2 INTERPRETATION</p> <p>I learned something. How do I interpret it?</p>	<p>3 IDEATION</p> <p>I see an opportunity. What do I create?</p>	<p>4 EXPERIMENTATION</p> <p>I have an idea. How do I build it?</p>	<p>5 EVOLUTION</p> <p>I tried something. How do I evolve it?</p>
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OTHER INSTRUCTIONAL CONSIDERATIONS

- Pre-K-5 Elementary School
- Performing Arts Zone
- New Tech PBL Instructional Model
- Design Thinking Integration



PARTNER EXPECTATIONS

EXPECTATIONS FOR 1882 OPERATING PARTNERS

- Retention of all staff as Edgewood employees
- Percent retention of SB 1882 funds: 8.9%
- Adherence to School Performance framework
- Open Enrollment with no academic entrance criteria
- Operating partner must have an employee assigned to the campus that serves daily.
- Principal manages the entire building during rollout
- New Tech in grades K-5
- Design Thinking Units Integrated into the scope and sequence

READY TO START?

To apply for an SB 1882 Partnership with EISD please visit our website www.eisd.net/schools-of-innovation

Contact Christopher Nester, Chief Transformation Officer at Edgewood ISD, for further information.

(210) 444-4500 Christopher.Nester@eisd.net

IMPORTANT QUALITIES



LEADERSHIP EXCELLENCE



SOCIAL & EMOTIONAL LEARNING SUPPORT



STRATEGIC STAFFING



FAMILY & COMMUNITY EMPOWERMENT



SCHOOL DESIGN



INSTRUCTIONAL EXCELLENCE



Gardendale Early Learning Program

1731 Dahlgreen Avenue
San Antonio, Texas 78237

210-444-8150

About Us



Principal | Kristin Willmann

Grades Served 2020-2021 | Pre-K - 1st

Founded | 2019

Instruction Hours | 7:45 a.m. - 3:15 p.m.

Office Hours | 7:15 a.m. to 4:00 p.m.

Meals | Free family-style breakfast and lunch served to all students

Academic Offerings

- Early Learning Program in partnership with Pre-K•4•SA
- Dual Language Immersion - One Way
 - Gracias Art Opportunity
- HighScope Quality Early Learning
 - Outdoor Learning

Family Engagement & Extracurricular Programs

- Parents as Partners
 - Health Fairs
- Walk in My Shoes
- Puentes al Futuro
 - Extended Day
 - Welcome Week

Mission: To provide students with strategically designed learning environments and opportunities that will utilize play to instill a lifelong love of learning.

Vision: Gardendale L.E.A.D.S from the heart. L- love who you teach. E-Enhance learning through excitement. A-Achieve goals together. D-Do the right thing. S-Strive for excellence.



STEAM
SCHOOL OF INNOVATION

Brentwood STEAM School of Innovation

1620 W. Thompson Place
San Antonio, Texas 78226
210-444-7675

About Us



Principal | Eva Beniflah Reyna

Grades Served 2020-2021 | 6th & 7th

Mascot | Vikings

Instruction Hours | 8:15 a.m. - 4:00 p.m.

Office Hours | 8:00 a.m. to 4:15 p.m.

Meals | Free breakfast and lunch
served to all students

Academic Offerings

- Focused on STEAM (Science, Technology, Engineering, Arts, and Mathematics) instruction, and a school-wide literacy framework, students will explore, invent, collaborate, and create as they design solutions to real-world problems and choose their pathway for high school, college, and beyond.
- Project Lead the Way (PLTW)
- Career and Technical Education (CTE) courses
- SpringBoard
- English & Mathematics

Extracurricular Programs

- Girls Who Code
 - Mariachi
 - Robotics
 - Rocket Team
- Science Mill Science Club
- STEM Discovery Club

Mission: We believe in building capacity in our students and staff, the next generation of leaders and explorers, using innovative practices to spark their learning to ensure they are globally competitive, armed with the tools and confidence to own their futures.

Vision: To prepare our students for success in 9th grade and beyond!

Core Values: Collaboration, Creation, and Critical Thinking



Gus Garcia Middle School

3306 Ruiz Street
San Antonio, Texas 78228
210-444-8075

About Us



Principal | Christopher Bland

Grades Served 2020-2021 | 6th - 8th

Mascot | Chargers

Instruction Hours | 8:45 a.m. - 4:15 p.m

Office Hours | 8:00 a.m. to 4:30 p.m.

Meals | Free breakfast and lunch served to all students

Academic Offerings

- Pre-Advanced Placement Courses
- American Sign Language (ASL)
 - Human Services
- English as a Second Language (ESL)
- Students can earn high school credit

Extracurricular Programs

- Girl Scouts
 - Band
- Chess Club
- Student Council
- Girls Who Code
 - Boys Sports (Basketball, Football, Soccer, Track & Field)
 - Girls Sports (Basketball, Cheer, Soccer, Track & Field, Volleyball)

Mission: To provide students with a quality education in a safe supportive environment in partnership with parents and the community.

Vision: Gus Garcia, in collaboration with parents and community members, will inspire students to become well-rounded, innovative thinkers and problem-solvers to prepare them for the future.

Core Values: Pride | Respect | Honesty | Responsibility | Integrity



John F. Kennedy High School

1922 S General McMullen
San Antonio, Texas 78226
210-444-8040

About Us



Principal | Graciela Martinez

Grades Served 2020-2021 | 9th - 12th

Mascot | Rockets

Instruction Hours | 8:45 a.m. - 4:15 p.m.

Office Hours | 8:00 a.m. to 4:30 p.m.

Meals | Free breakfast and lunch
served to all students



Academic Offerings

- Early College High School
- Dual Credit/College Credit
- Law & Public Service
- Information Technology
- Networking Systems
- Automotive
- Business, Marketing & Finance
- Arts, Audio - Video Technology and Communications

Extracurricular Programs

- ROTC
- Academic Decathlon
- Dance Team
- National Honors Society
- Marching Band
- Sociedad Honora Hispanica
- Drum Line
- Athletic Program
- Graphic Design
- Spanish Club
- Theatre/Drama
- Automotive Technology Club
- Yearbook
- Explorers - Criminal Justice Club
- Chess Club
- Art Club

**Awarded 4 Texas Education Agency Campus
Distinction Designations in 2018-2019**

Mission: "Let us think of education as the means of developing our greatest abilities, because in each of us there is a private hope and dream which, fulfilled can be translated into benefit for everyone and greater strength of the nation."

- John F. Kennedy

Vision: Learning and Growing Together! Kennedy Strong!

Campus Beliefs: Family | Service | Respect



E.T. Wrenn Middle School

627 S Acme
San Antonio, Texas 78237
210-444-8475

About Us



Principal | Dr. Timothy Vaughn

Grades Served 2020-2021 | 6th - 8th

Mascot | Hornets

Instruction Hours | 8:40 a.m. - 4:15 p.m

Office Hours | 8:00 a.m. to 4:30 p.m.

Meals | Free breakfast and lunch
served to all students

Academic Offerings

- AP Spanish Language and Culture
- Dual Language Immersion- Two Way
- Career Technology Education (CTE)
- English as a Second Language (ESL)
- University Interscholastic League (UIL)
 - Project Lead the Way (PLTW)
 - Social Emotional Learning
 - Gifted and Talented

Extracurricular Programs

- National Junior Honor Society
 - One Act Play/Drama
 - Orchestra
 - Mariachi
 - Robotics
 - Science Club
 - Chess Club
 - Spanish Club
- Student Government Association
- Audio/Visual Technology Comm
- Boys Sports (Basketball, Football, Soccer, Track & Field, Tennis)
- Girls Sports (Basketball, Soccer, Track & Field, Volleyball)

Mission: Provide authentic learning experiences that enable all learners to reach their highest potential in life.

Vision: Laying the foundation for lifelong learning.

EDGEWOOD ISD CHOICE 2020

Edgewood ISD establishes innovative schools to enhance student learning, increase choice opportunities within the EISD, and encourage different and innovative instructional methods.

CALL FOR
QUALITY
SCHOOLS

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Introduction

The Edgewood ISD Office of Transformation & Innovation Department's mission is to design environments that engage, transform, and inspire generations of learners to become the leaders of tomorrow. We strive to preserve our district's rich cultural history while looking towards the future to achieve our mission, to offer an exceptional learning experience that engages, empowers, and prepares students to compete and reach their highest potential in an ever-changing World.

The EISD Office of Transformation and Innovation plays a role in achieving the district's goal through its Call for Quality Schools in order to create learning communities in which educators can meaningfully and deeply engage students intellectually by tapping into their specific interests, aspirations, preferred learning styles, personal circumstances, and values.

The theory of action of this model is clear: Offer high quality seats by granting autonomy to schools, empower parents to make choices, create performance requirements with campuses, annually evaluate performance, and make strategic decisions regarding growing access to high performing schools and addressing low performing schools.

Currently in Edgewood, choice is expressed primarily through our high schools and our various Career and Technical Education programs. However, interest or admission criterion may preclude students from attending. Over the coming years, the Edgewood ISD Office of Transformation and Innovation will help expand EISD School Choice options for all students, regardless of their academic abilities.

Future Choice Schools offered by Edgewood ISD may include a variety of instructional approaches and content/themes, such as:

- Business / Entrepreneurship
- Communications
- Government / World Affairs
- Health & Humanities
- Visual and Performing Arts
- Dual Language
- Early College High School
- Expeditionary Learning
- International Baccalaureate (IB)
- Leadership Academy
- Montessori
- Performance / Competency-Based Learning
- Personalized Learning
- Project Based Learning / Design Thinking
- Pathways to Early College High School / P-TECH
- STEM / STEAM
- Single Gender
- Virtual School

Call for Quality Schools

To expand and increase the number of high-quality Choice Schools in the district, the Office of Transformation and Innovation is requesting proposals from qualified educators and leaders in who want to utilize their creative skills and past success to launch autonomous, district-authorized charter schools.

The Edgewood ISD Choice Schools that come out of the EISD School Choice application process will be exemplars in their educational program design.

Standard of Review. The Review Committee shall conduct a rigorous, evidence-based, and merit-focused evaluation of applications, including evaluating the proposed partner’s capacity to meet the Board’s established academic, financial, operational, and governance standards for innovation schools. The Board shall grant an innovation only in cases in which the Board determines that the proposed school is likely to:

1. Succeed in meeting academic, financial, operational, and governance standards, thereby meeting both performance and legal compliance expectations for campus innovations in the District;
2. Serve the best interests of the targeted students and community; and
3. Fulfill the purposes and intent of Texas’s innovation school law.

Finality of Review: Once the review committee has determined that at any point during the review process that an applicant does not meet criteria or has not adhered to prescribed rules, the applicant will be notified of the decision. Any and all decisions made by the review committee are final and may not be appealed.

Applicant Types

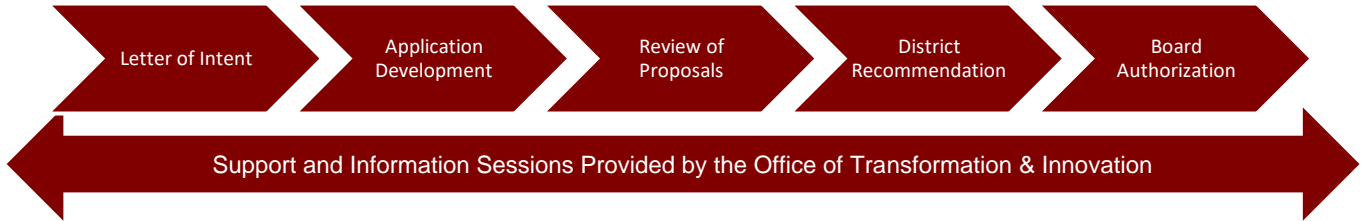
In this application cycle, two types of applicants will be considered, each with specific requirements.

Existing Partners – university, state-authorized, district-authorized, or out-of-state charter school operators which are in good standing, defined as receiving acceptable academic and financial accountability ratings for the three preceding school years, and never having their charters revoked.

New Partners – nonprofit organizations, institutes of higher education, governmental entities, or school operators that do not meet the qualifications of an existing operator.

All applicants must complete Sections 1 – 5 of the application. Existing Partners and any applicant proposing to contract with an entity that has previously operated schools (often referred to as an Education Service Provider or ESP) must also complete the Existing/Experienced Partner Supplement and all related attachments.

EISD Choice - 2020-2021 Call for Quality Schools Timeline	
Release of the Call for Schools Letter of Intent and Proposal	March 6, 2020
During this time, the Office of Transformation and Innovation (OTI) will be available to schedule exploratory meetings (highly encouraged) with potential Applicant Teams regarding the Call for Quality Schools. Please contact the Office of Transformation & Innovation to schedule: EISDChoice@eisd.net or 210-444-8101.	March-June 2020
Letter of Intent to Apply due to the Office of Transformation & Innovation at EISDChoice@eisd.net	May 1, 2020
EISD Partnership Application due to the Office of Transformation & Innovation at EISDChoice@eisd.net	August 28, 2020
Office of Transformation & Innovation conducts review of all applications, conducts capacity interviews, announces recommended applicants, and prepares recommendation to the EISD School Board for authorization.	September 2020
Performance Agreement Negotiations	October-November 2020
EISD School Board Authorization of Partnership and approval of the Performance Agreement.	November 2020
Application Submitted to TEA Benefits Process	December 18, 2020
TEA Notifies District of Benefits Status	April 15, 2021
Office of Transformation & Innovation works with new applicants to prepare for launch of the proposed school	January to June 2021



Instructions

EISD Choice is pleased to invite proposals for new quality partners seeking to open a partnership school in the fall of 2021 and beyond. Prior to developing a proposal, please read this entire document.

Components of the Proposal

- Narrative Proposal: The proposal is the formal application to the Board and is a comprehensive description of the school's educational, operational, and financial plans. All applicants are required to submit Sections 1-5 of the application. Experienced applicants that have previously operated a charter school (in Texas or another state) and applicants proposing to partner with an education service provider (ESP) are also required to complete Section 6.
- Attachments: Throughout the proposal, specific documents are requested in addition to narrative answers. Attachments may not contain additional narrative unless specified. A comprehensive list of the attachments is provided in these instructions.
- Capacity Interview (at the discretion of the District and Review Committee): Applicants may have the opportunity to present their plan and demonstrate the team's capacity to open and maintain a high-quality innovation school, as well as to answer specific questions about their proposal.

Specifications

- Applicants **must** submit proposals electronically and use any applicable template provided to EISDChoice@eisd.net.
- Only responses placed within the text boxes provided will be considered in evaluation activities. All elements of the proposal must be presented in 11-point font and single-spaced.
- Each major section of the proposal (School Overview, Educational Program, etc.) and each attachment must begin on a separate page.
- **Applicants must adhere to the following page limits (page limits do not include attachments):**
 - **Section 1: 5 pages**
 - **Sections 2-4: 30 pages total**
 - **Section 5: 5 pages**
 - **Section 6: 5 pages (if applicable)**
- If a particular question does not apply to the team or proposal, respond "Not Applicable" **and** state the reason this question is not applicable to your team or proposal.
- All required documents should be uploaded in the file format specified.
- Late or incorrectly formatted submissions will not be accepted.
- When submitting résumés, label each document with the individual's affiliation with the proposed school (e.g., board member, principal, etc.).

Attachments

- The following is a list of attachments to accompany the proposal. Note that not all attachments will be applicable for all applicants. It is the responsibility of the applicant to ensure they submit all

attachments required for their proposal. Documents submitted beyond the requested attachments will not be considered. Do not upload documents for any attachment that is not applicable. All attachments should be submitted as follows:

- Titled: Attachment #_Applicant Name
- With the exception of the Financial Plan Workbook, all documents should be submitted as a pdf. The Financial Plan Workbook must be submitted as an editable Excel document.

Attachments:

- Attachment 1: Graduation Standards (if applicable)
- Attachment 2: Enrollment Policy
- Attachment 3: Discipline Policy
- Attachment 4: Organization Charts
- Attachment 5: Board Documents
- Attachment 6: Board Member Resumes
- Attachment 7: Leadership Team Qualifications or Role Description
- Attachment 8: School Leader Qualifications or Role Description
- Attachment 9: Financial Plan Workbook (use template provided)
- Attachment 10: Financial Plan Narrative
- Edgewood Supplement Attachment 1: Evidence of Community Partnerships
- Existing Operator Attachment 1: Evidence of Prior Academic Success (if applicable)
- Existing Operator Attachment 2: Audited Financial Documents (if applicable)
- Existing Operator Attachment 3: Management Agreement (if applicable)

Applicant Code of Conduct

- Members of the Board are obligated to make decisions in the best interests of children, free from personal or political influences. Similarly, innovation school applicants have the responsibility of respecting and upholding the integrity of the innovation school proposal process.
- Specifically, innovation school applicants shall not:
 - Initiate, or attempt to initiate, any activity with a Trustee;
 - Initiate, or attempt to initiate, any activity with a member of the Evaluation Team; or
 - Direct any communications, including proposal documents, to a Trustee or to a member of the Evaluation Team.
- Innovation school applicants found to be in violation of these requirements may be deemed ineligible for consideration in future proposal processes.

Public Disclosure

All innovation school proposal materials submitted to the Board become public records.

2020 Request for Proposals for Charter Operators

Please submit an application that addresses the following questions. There are no page limits for individual topics, however overall page limits for sections are listed on page 3. Responses beyond stated page limits will not be considered.

Please keep in mind that your application is a professional document. The quality of the document that you submit should reflect the quality of the school that you propose to open. Evaluation Teams will be able to navigate well-organized, effectively edited documents easily, thereby focusing their energy on reviewing the content of each application. Grammar, spelling, and formatting all make an impression on an evaluator.

Plagiarism

The Texas State University Student Handbook defines plagiarism as “the appropriation of another’s work and the unacknowledged incorporation of that work in one’s own written work” (Texas State University Student Handbook). Individuals and groups seeking the right and responsibility to educate public school children at public expense should be accountable to the highest standards of academic integrity. The Board considers plagiarism, including the copying of language from any other innovation application without proper attribution, as grounds for immediate denial.

The Board understands that to implement an existing curriculum, instructional framework, or educational model (e.g., Montessori, arts integration, project-based learning, blended learning, etc.) with fidelity, key concepts must be discussed. However, it is not acceptable to copy and paste this discussion or description from another source. A high-quality applicant team with the capacity to operate a high-quality school must be able to thoughtfully explain in their own words how they intend to educate children. The Board also understands that existing operators proposing to replicate a model may use their own intellectual property, which is appropriate and acceptable.

Applicant Information

Name of Applicant Organization	Click to enter text.
Primary Contact Person	Click to enter text.
Mailing Address	Click to enter text.
Phone Number	Click to enter text.
Email	Click to enter text.

Names, current jobs and employers, and proposed roles of all persons on applicant team (*Add lines as needed*)

Full Name	Current Job Title and Employer	Position with Proposed School
Click to enter text.	Click to enter text.	Click to enter text.
to enter text.	Click to enter text.	Click to enter text.

The applicant is a:

New Operator

Existing Operator (i.e., has previously operated one or more charter schools)

Does this applicant team have charter school applications under consideration by any other authorizer(s) in the United States?

Yes

No

If Yes, complete the table below (*Add lines as needed*)

State	Authorizer	Proposed School Name	Application Due Date	Decision Date
Click to enter text.	Click to enter text.	Click to enter text.	Click to enter text.	Click to enter text.
Click to enter text.	Click to enter text.	Click to enter text.	Click to enter text.	Click to enter text.
Click to enter text.	Click to enter text.	Click to enter text.	Click to enter text.	Click to enter text.
Click to enter text.	Click to enter text.	Click to enter text.	Click to enter text.	Click to enter text.

Does this applicant team have new schools or campuses scheduled to open in the United States in the next five years?

Yes

No

If Yes, complete the table below (*Add lines as needed*)

Planned School Name	City	State	Opening Date
Click to enter text.	Click to enter text.	Click to enter text.	Click to enter text.
Click to enter text.	Click to enter text.	Click to enter text.	Click to enter text.
Click to enter text.	Click to enter text.	Click to enter text.	Click to enter text.
Click to enter text.	Click to enter text.	Click to enter text.	Click to enter text.

School Information

NOTE: Complete this part for each school / campus included in this proposal. Duplicate as needed.

Proposed School / Campus Name	Opening Year	Grades: Year 1	Grades: At Capacity
Click to enter text.	Click to enter text.	Click to enter text.	Click to enter text.
Proposed Location			
School District <i>Identify the school district in which the innovation school will be located.</i>		Click to enter text.	
Address of Identified Facility <i>If applicable.</i>		Click to enter text.	
Projected Demographic Information			
	% FRL: Click enter text.	% SpEd: Click to enter text.	% ELL: Click to enter text.
Model / Specialty (<i>Check all that apply</i>)			
<input type="checkbox"/> Alternative	<input type="checkbox"/> Career / Technical Ed.	<input type="checkbox"/> Military	<input type="checkbox"/> Montessori
<input type="checkbox"/> STEM/STEAM	<input type="checkbox"/> College Prep	<input type="checkbox"/> Language Immersion	<input type="checkbox"/> Arts
<input type="checkbox"/> Blended Learning	<input type="checkbox"/> Other (<i>list</i>):	<input type="checkbox"/> Disability (<i>list</i>):	

Name of Proposed Principal <i>(if identified)</i>	Click to enter text.
Current Employment	Click to enter text.
Phone Number – Day	Click to enter text.
Phone Number – Evening	Click to enter text.
Email	Click to enter text.

Section 1 – School Overview

This section is not rated separately by the evaluators. It provides the evaluators with a reference for each of the other sections of the proposal, which will be assessed, in part, for the quality of alignment with the School Overview.

Executive Summary

The Executive Summary should provide a concise overview of the proposed plan for the school; the outcomes you expect to achieve; the geographic and population considerations of the school environment; the challenges particular to those considerations; and the applicant team’s capacity to successfully open and operate a high-quality school given the above considerations.

- 1. Mission and Vision.** State the mission and vision of the proposed school. The mission is a statement of the fundamental purpose of the school, describing why it exists. The vision statement describes how the school will operate and what success looks like for students. The mission and vision statement provide the foundation for the entire proposal, and taken together, should identify the students and community to be served and illustrate what success for students will look like.
- 2. Educational Need and Anticipated Student Population.** Describe the anticipated student population, students anticipated educational needs, and non-academic challenges the school is likely to encounter. Describe the rationale for selecting the location and targeting this student population.
- 3. Education Plan / School Design.** Provide an overview of the education program of the proposed school, including major instructional methods, assessment strategies, and non-negotiables of the school model. Describe the evidence that demonstrates the school model will be successful in improving academic achievement for the targeted student population.

Click or tap here to enter text.

- 4. Leadership and Governance.** List the current members of the school’s proposed leadership team and governing board, including their roles with the school and their current professional affiliations.

Add lines to the following table, as needed. Do not list members of the applicant team who will not have an official leadership role with the school going forward, such as consultants.

Full Name	Current Job Title and Employer	Position with Proposed School
Click to enter text.	Click to enter text.	Click to enter text.
Click to enter text.	Click to enter text.	Click to enter text.

Enrollment Summary

- Complete the table below, illustrating the growth plan for the school. Indicate the school year (e.g., for Year 1, change 20xx to 2021) for each column.

Grade Level	Number of Students					
	Year 1 20xx	Year 2 20xx	Year 3 20xx	Year 4 20xx	Year 5 20xx	At Capacity 20xx
Pre-K	Click to enter text.	Click to enter text.	Click to enter text.	Click to enter text.	Click to enter text.	Click to enter text.
K	Click to enter text.	Click to enter text.	Click to enter text.	Click to enter text.	Click to enter text.	Click to enter text.
1	Click to enter text.	Click to enter text.	Click to enter text.	Click to enter text.	Click to enter text.	Click to enter text.
2	Click to enter text.	Click to enter text.	Click to enter text.	Click to enter text.	Click to enter text.	Click to enter text.
3	Click to enter text.	Click to enter text.	Click to enter text.	Click to enter text.	Click to enter text.	Click to enter text.
4	Click to enter text.	Click to enter text.	Click to enter text.	Click to enter text.	Click to enter text.	Click to enter text.
5	Click to enter text.	Click to enter text.	Click to enter text.	Click to enter text.	Click to enter text.	Click to enter text.
6	Click to enter text.	Click to enter text.	Click to enter text.	Click to enter text.	Click to enter text.	Click to enter text.
7	Click to enter text.	Click to enter text.	Click to enter text.	Click to enter text.	Click to enter text.	Click to enter text.
8	Click to enter text.	Click to enter text.	Click to enter text.	Click to enter text.	Click to enter text.	Click to enter text.
9	Click to enter text.	Click to enter text.	Click to enter text.	Click to enter text.	Click to enter text.	Click to enter text.
10	Click to enter text.	Click to enter text.	Click to enter text.	Click to enter text.	Click to enter text.	Click to enter text.
TOTAL	Click to enter text.	Click to enter text.	Click to enter text.	Click to enter text.	Click to enter text.	Click to enter text.

- Then, briefly describe the rationale for the number of students and grade levels served in Year 1 and the basis for the growth plan as outlined in the table.

Click or tap here to enter text.

Section 2 – Educational Program

A strong Educational Program is coherent overall and aligned internally with the school’s mission and vision, Operations Plan, and Financial Plan.

Curriculum and Instructional Design

Effective Schools Framework Prioritized Lever 4 (High-Quality Curriculum) and 5 (Effective Instruction)

1. Provide evidence of the following:
 - a. A framework for a rigorous, quality instructional design that reflects the needs of the school’s target population and will ensure all students meet or exceed the expectations of Texas state standards;
 - b. Sound instructional strategies that incorporate rigorous, high-quality experiences that promote critical-thinking skills and an explanation of why they are well-suited for the targeted student population;
 - c. Effective methods and systems for providing differentiated instruction to meet the needs of all students and plans to utilize an RTI model to identify and serve students with learning gaps;
 - d. A plan to maximize instructional time through consistent, efficient, and visible structures; and
 - e. A sound base for the proposed educational program in research, theory, and/or experience, including that it is likely to be rigorous, engaging, and effective for the anticipated student population.

Click or tap here to enter text.

High School Graduation Requirements *(High Schools Only)*

2. Provide evidence of the following:
 - a. As **Attachment 1**, exit standards for graduating students. These should clearly set forth what students in the last grade served will know and be able to do and ensure student readiness for college or other post-secondary opportunities (e.g., trade school, military service, or entering the workforce); and
 - b. Systems and structures the school will implement for students at risk of dropping out or not meeting exit standards.

Click or tap here to enter text.

Special Populations and At-Risk Students

3. Provide evidence of the following:
 - a. A sound explanation of evidence from which the projection of anticipated special populations was derived;
 - b. A comprehensive and compelling plan for appropriate identification of students with special needs and to ensure they are served in the least-restrictive environment possible, have appropriate access to the general education curriculum and schoolwide educational, extra-

curricular, and culture-building activities in ways that support their development, receive required and appropriate support services as outlined in their IEPs and 504 plans, and participate in standardized testing;

- c. A comprehensive and compelling plan for providing services to ELLs, including methods for appropriate identification of ELLs, specific instructional programs, practices, and strategies the school will employ to ensure academic success and equitable access to the general education curriculum and core academic program for these students, plans for monitoring and evaluating student progress and success of ELLs and for exiting them from services, and plan for including ELLs in standardized testing and schoolwide educational, extra-curricular, and culture-building activities;
- d. A comprehensive and compelling plan for providing services to students identified as intellectually gifted, including methods for appropriate identification of students, specific instructional programs, practices, and strategies the school will employ; and
- e. Demonstrated understanding of – and capacity to fulfill – state and federal obligations and requirements pertaining to students with disabilities, ELLs, and students identified as intellectually gifted.

Click or tap here to enter text.

Student Recruitment and Enrollment

- 4. Provide evidence of the following:
 - a. A sound and thoughtful student recruitment and marketing plan and timeline that will provide equal access to all interested students and families, including those in poverty, academically low-achieving students, students with disabilities, and other youth at risk of academic failure; and
 - b. As **Attachment 2**, an Enrollment Policy that complies with state law and that ensures the school will be open to all eligible students.

Click or tap here to enter text.

School Culture and Discipline

Effective Schools Framework Prioritized Lever 3 (Positive School Culture)

- 5. Provide evidence of the following:
 - a. A vision for school culture or ethos that will promote high expectations, a positive academic environment, and shared ownership of intellectual and social development for all students, including those with special needs, ELLs, and students at risk of academic failure;
 - b. A coherent plan for establishing and maintaining the intended culture for students, teachers, administrators, and parents from the first day of school and throughout the school year and proposed mechanisms for monitoring campus climate;
 - c. A clear plan to create an inclusive and welcoming environment that will engage families in positive, constructive, and personalized ways that meaningfully contribute to the school culture;
 - d. A system of proactive and responsive student support services (e.g., counseling, mentoring,

external service referrals) to meet student needs;

- e. As **Attachment 3**, a student discipline policy that provides for appropriate and effective strategies to support a safe, orderly school climate and fulfillment of educational goals, promoting a strong school culture while respecting student rights;
- f. Legally sound policies for student discipline, suspension, and expulsion that do not indicate students will be removed in an inappropriate manner, as well as appeals, including proper processes for students with disabilities; and
- g. Systems and processes for tracking discipline referrals and interventions to identify trends and adapt activities accordingly.

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Assessment and Evaluation

Effective Schools Framework Prioritized Lever 4 (High-Quality Curriculum)

- 6. Provide evidence of the following:
 - a. Annual student performance goals that include targets aligned with the state accountability system;
 - b. An effective plan (including qualified personnel) and system to implement and interpret interim assessments that will measure academic progress – of individual students and student cohorts – throughout the school year and strategies to employ corrective actions when needed;
 - c. A comprehensive, effective plan (including qualified personnel) and system for collecting and analyzing student academic achievement data, using the data to refine and improve instruction – including providing training and support to school leadership and teachers – and reporting the data to the school community. This should include identification of the student data system to be used, as well as qualified personnel who will be responsible for managing and interpreting the data for teachers and leading or coordinating data-driven professional development; and
 - d. Thoughtful, appropriate corrective actions that the school and network (if applicable) will take if either falls short of the goals at any level, including explanation of what would trigger such actions and who would implement them.

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Section 3 – Governance, Operating Plan, and Capacity

A strong Operations Plan is coherent overall and aligned internally with the school’s mission and vision, Educational Program, and Financial Plan.

Organizational Structure

7. Provide evidence of the following:
 - a. As **Attachment 4**, an organizational chart that clearly indicates all positions and delineates appropriate lines of authority; and
 - b. That the proposed school’s legal status (i.e., non-profit and federal tax exempt) and structure that are in compliance with state law.

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Governing Board

8. Provide evidence of the following:
 - a. The independence of the board as it relates to the authorizer;
 - b. Clear, appropriate plans for the board(s) to evaluate the success of the school(s) and school leader(s), including planned frequency of meetings and standing committees;
 - c. As **Attachment 5**, appropriate bylaws, proposed Code of Ethics and Conflict of Interest policy/procedures, and completed and signed statements of assurances that will minimize real or perceived conflicts;
 - d. As **Attachment 6**, a Board Member Information Sheet, resume, and proof of U.S. citizenship for each proposed Board Member to demonstrate that the proposed governing board members will contribute the wide range of knowledge, skills, and commitment needed to oversee a successful innovation school, including educational, financial, legal, and community experience and expertise;
 - e. A sound plan and timeline for board recruitment, expansion, orientation of new members, and ongoing training for members. Plan should include a thoughtful identification of desired experience and qualifications; and
 - f. Sufficient capacity within and/or an appropriate relationship to any pre-existing non-profit board.

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Application Team Capacity

Effective Schools Framework Prioritized Lever 1 (Strong School Leadership and Planning)

9. Provide evidence of the following:
 - a. As **Attachment 7**, the collective qualifications (documented by résumés and bios for all members) to implement the school design successfully, including capacities in areas such as school leadership, administration, and governance; curriculum, instruction, and assessment; performance management; and parent and community engagement; and

- b. As **Attachment 8**, the proposed School Leader’s experience in/ability to design, launch, and lead a school that effectively serves the target population, as well as evidence that the proposed leader is well-qualified to implement the specific educational program being proposed. Any identified leadership training is appropriate for and aligned with the educational program (*if the School Leader candidate(s) is identified*); or
- c. As **Attachment 8**, the board and/or network’s (if applicable) preparation and plan to recruit and retain a leader with the ability to lead a school that effectively serves the target population (*if School Leader candidate(s) is not yet identified*); and
- d. Describe the plan to structure the work of the school leaders in the first year of operation and beyond, including how performance expectations will be clear, written, measurable, and aligned to the mission of the school.

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Staffing Plans, Hiring, Management, and Evaluation

Effective Schools Framework Prioritized Lever 2 (Effective, Well-Supported Teachers)

- 10. Provide evidence of the following:
 - a. A recruitment and hiring strategy, including selection criteria, protocol, and timeline, that are likely to result in a strong staff that is well-suited to the school;
 - b. A plan for providing targeted and personalized support and development to retain a high-performing staff;
 - c. Identification of evaluation tools and processes that will capture trends and track and promote teacher progress over time; and
 - d. Effective planning for unsatisfactory leadership/teacher performance and turnover.

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Professional Development

- 11. Provide evidence of the following:
 - a. Sensible allocation of responsibilities for professional development, including demonstrated understanding of, and preparation for, professional development needs; and
 - b. Professional development methods, calendar, and staffing that effectively support the education program and are likely to maximize success in improving student achievement, including an induction program that will prepare teachers to deliver any unique or particularly challenging aspects of the educational program.

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Section 4 – Financial Plan

A strong Financial Plan is coherent overall and aligned internally with the school's mission and vision, Educational Program, and Organization Plan.

Financial Plan

12. Provide evidence of the following:

- a. Reasonable assurances that the partner will have sound systems, policies, and processes for financial planning, accounting, purchasing, and payroll, including a description of how it will establish and maintain strong internal controls, ensure compliance with all financial reporting requirements, and conduct independent annual financial and administrative audits;
- b. That the school's leadership has a strong understanding of the appropriate delineation of roles and responsibilities among the administration and governing board regarding school finance;
- c. That the school will ensure financial transparency, including plans for public adoption of the school's budget and public dissemination of its annual audit and an annual report;
- d. As **Attachment 9**, a complete, realistic, and viable operating budget within the Financial Plan Workbook provided;
- e. As **Attachment 10**, a detailed budget narrative that clearly explains reasonable, well-supported revenue and cost assumptions, including grant/fundraising assumptions, including identifying the amount and sources of all anticipated funds, property, or other resources (noting which are secured vs. anticipated, and including evidence of firm commitments where applicable); and
- f. Sound contingency planning to meet financial needs if anticipated revenues are not received or are lower than estimated.

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Section 5 – Edgewood Supplement

A strong proposal will demonstrate proactive engagement of parents and community partners as well as a clear, targeted plan to meet one of the needs identified by EISD.

1. **Stafford Performing Arts Elementary**
2. **Perales STEAM Elementary**
3. **Winston STEAM Elementary**
4. **Las Palmas Leadership School for Girls**
5. **Cisneros Leadership School for Boys**
6. **John F. Kennedy Pathways to Technology Early College High School**

Meeting the Need

1. Provide evidence of the following:
 - a. A compelling interest in filling the identified need within the Edgewood Independent School District; and
 - b. That the proposed model would meet the specific need identified and would help to promote the mission of the Edgewood Independent School District.

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Parent and Community Involvement

2. Provide evidence of the following:
 - a. The role to date of any parents, neighborhood, and/or community members involved in the development of the proposed school;
 - b. A sound description of how the applicant will engage parents, neighborhood, and community members from the time that the application is approved through the opening of the school, including specific strategies to be implemented to establish buy-in and to learn parent priorities and concerns during the transition process and post opening;
 - c. A sound description of how the applicant will engage parents in the life of the school (in addition to any proposed governance roles), including an explanation of the plan for building family-school partnerships that strengthen support for learning and encourage parental involvement and a description of any commitments or volunteer activities the school will seek from, offer to, or require of parents;
 - d. The community resources that will be available to students and parents, including:
 - Description of any partnerships the school will have with community organizations, businesses, or other educational institutions;
 - Details on the nature, purposes, terms, and scope of services of any such partnerships, including any fee-based or in-kind commitments from community organizations or individuals that will enrich student-learning opportunities; and
 - e. As **Edgewood Supplement Attachment 1**, evidence of support from community partners and/or parent groups, including letters of intent/commitment, memoranda of understanding, and/or

contracts;

- f. The group's ties to and/or knowledge of the target community, including the initiatives and/or strategies that will be implemented to learn from and engage the neighborhood, community, and broader city; and
- g. Organizations, agencies, or consultants that are partners in planning and establishing the school, along with a brief description of their current and planned role and any resources they have contributed or plan to contribute to the school's development. If the group is new to Texas, sound description of how the applicant's previous work has prepared the applicant to establish relationships and supports in this new community.

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Section 6 – Experienced Operator Supplement

A strong proposal from a partner that has previously operated schools, or a partner proposing to contract with an entity that has previously operated schools (often referred to as an Education Service Provider or ESP), is coherent overall and aligned internally with the school's mission and vision, Educational Program, Operational Plan, Financial Plan, and any other applicable attachments. Existing Charter Partners should complete only question 1, below. Any applicant proposing to contract with an Education Service Provider (ESP) should complete questions 1 and 2.

Existing Charter Operator Track Record

1. Provide evidence of the following:
 - a. As **Existing Operator Attachment 1**, the existing partner applicant or ESP's success in serving populations similar to the population that the applicant intends to serve, including evidence of academic success and successful management of non-academic school functions (e.g., back-office services, school operations, extracurricular programs);
 - b. As **Existing Operator Attachment 2**, the financial health of the existing partner applicant or ESP as demonstrated through an independent financial audit report and its most recent annual report; and
 - c. A clear description of any history of charter revocations, non-renewals, withdrawals, or failures to open for the existing partner applicant or ESP.

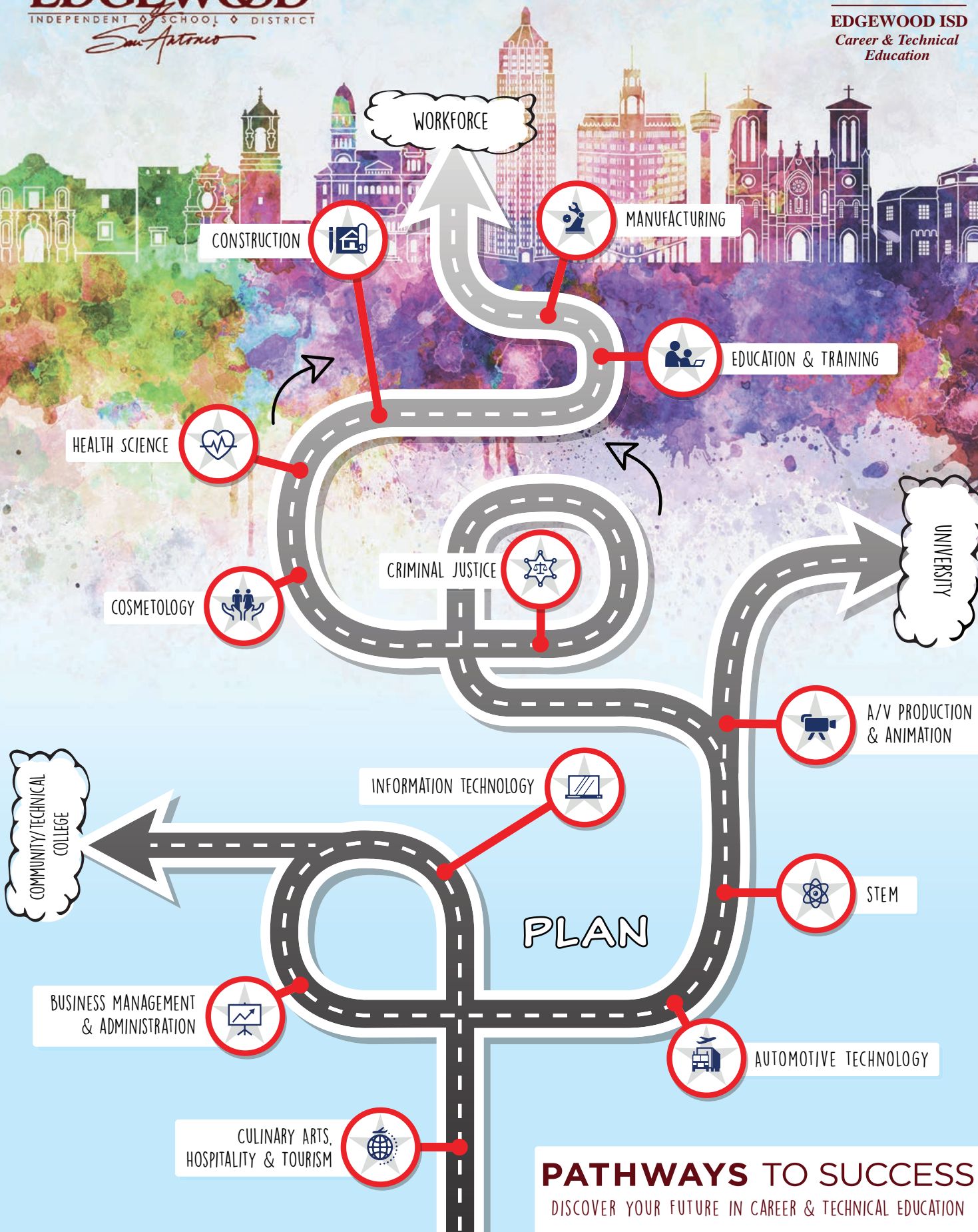
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ESP Management Plan and Legal Relationship

2. Provide evidence of the following:
 - a. As **Existing Operator Attachment 3**, a clear and appropriate Management Agreement that includes:
 - A detailed description of the roles and responsibilities of the ESP;
 - A detailed explanation of the scope of services and costs of all resources to be provided by the ESP;
 - A detailed description of the oversight and evaluation methods that the board will use to oversee the ESP, including schoolwide and student achievement results which the management organization is responsible for achieving, and a description of how often, and in what ways, the board will review and evaluate the ESP's progress toward achieving agreed-upon goals;
 - A detailed explanation of the conditions, standards, and procedures for board intervention if the management organization's performance is deemed unsatisfactory;
 - A detailed explanation of the compensation structure, including clear identification of all fees to be paid to the ESP and the schedule on which the ESP will receive compensation;
 - A detailed explanation of the financial responsibilities of the ESP, including the ownership of items purchased with public funds, including which operating and capital expenditures each party will be responsible for assuming, what types of spending decisions the ESP can make without obtaining board approval, and what reports ESP

- submit to the board on financial performance and on what schedule;
 - A detailed description of the duration, renewal, and termination of the management agreement, including how often the management agreement may be renewed, the conditions that both the ESP and the school must satisfy for the management agreement to be renewed, and the procedures for determining whether the management agreement will be renewed;
 - A detailed description of the grounds for which the ESP or the school can terminate the management agreement for cause, including provisions for notice to the other party and any conditions under which either party may terminate the management agreement without cause;
 - An explanation and justification of any indemnification provisions in the event of default or breach by either party;
- b. A compelling plan for the operation of the school in the case that the management agreement is terminated;
- c. That the board is independent from the ESP and self-governing, including separate legal representation of each and arm’s-length negotiating and no existing or potential conflicts of interest between the school’s governing board and proposed ESP or any affiliated business entities;
- d. A clear and detailed explanation of the supervisory responsibilities of the ESP (if any), including which school employees the ESP will supervise, how the ESP will supervise these employees, and how the charter school board will oversee the ESP supervisory responsibilities;
- e. A detailed explanation and compelling justification of any lease, promissory notes, or other negotiable instruments, any lease-purchase agreements or other financing relationships with the ESP, including evidence that such agreements are separately documented and not part of or incorporated in the ESP agreement. Such agreements must be consistent with the school’s authority to terminate the ESP agreement and continue operation of the school; and
- f. A detailed explanation and compelling justification of any loans, grants, or investments made between the ESP and the school, including an explanation and justification of how any such loans, grants, or investments may be initiated, repaid, and refused by the school.

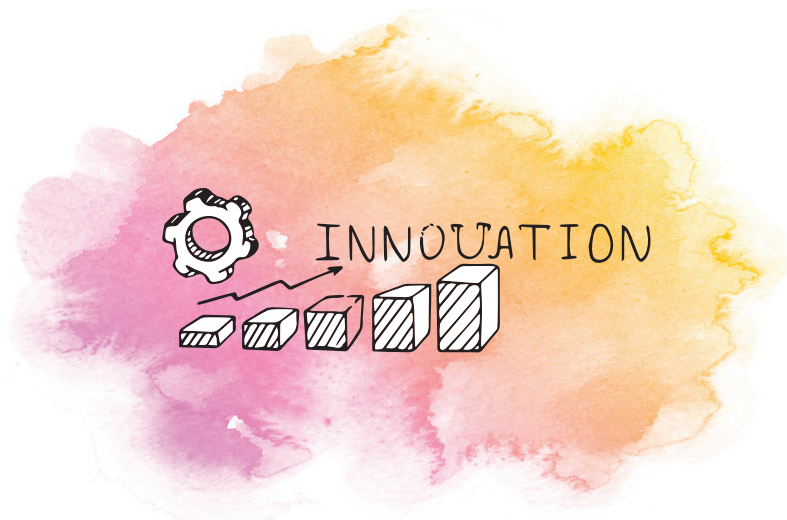
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PATHWAYS TO SUCCESS
DISCOVER YOUR FUTURE IN CAREER & TECHNICAL EDUCATION

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EISD SECONDARY SCHOOLS

HIGH SCHOOLS

John F. Kennedy High School

Memorial High School

Edgewood Fine Arts Academy

MIDDLE SCHOOLS

Brentwood Middle School

Gus Garcia Middle School

Wrenn Middle School





Edgewood ISD provides all students the opportunity to enroll in Career & Technical Education (CTE) courses that are meaningful, relevant, and aligned with challenging academic standards as well as real world industry careers.

Our Career and Technical Education programs are committed to preparing students to succeed in the 21st Century and in making seamless transitions to continuing their education and careers. Edgewood ISD’s Career & Technical Education courses are organized into career clusters that provide scholars with hands on learning experiences and opportunities to earn industry certifications.

EISD currently offers students opportunities to learn about careers in 12 career clusters that include Arts, Audio/Video Production & Communications, Architecture & Construction, Business Management & Administration, Education & Training, Health Science, Hospitality & Tourism, Human Services, Information Technology, Law & Public Safety, Manufacturing, Science, Engineering & Mathematics, Transportation, Distribution & Logistics.

Students have extended learning opportunities through Career and Technical Student Organizations (CTSO) that provide further opportunities for leadership and citizenship development through projects and competitions.

CTE PROGRAMS OFFERED



Cosmetology



Manufacturing



Culinary Arts,
Hospitality
& Tourism



A/V Production
& Animation



Information
Technology



Construction



Criminal
Justice



Health Science



Education
& Training



Automotive
Technology

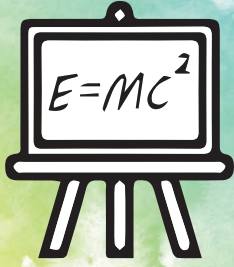


Business
Management &
Administration



Science,
Technology,
Engineering &
Mathematics

CTE PATHWAY OFFERINGS



EDGEWOOD FINE ARTS ACADEMY

Computer Programing
Construction Technology
Cosmetology
Engineering/Robotics
Manufacturing: Welding

JOHN F KENNEDY HIGH SCHOOL

A/V Production
Animation
Automotive Technology
Business Management and Administration
Criminal Justice: Law Enforcement
Criminal Justice: Legal Studies
Information Technology: Cyber Security



MEMORIAL HIGH SCHOOL

Business Management and Administration
Culinary Arts
Education and Training
Health Science: Medical Assistant
Health Science: Pharmacology
Hospitality and Tourism





A/V Production & Animation

THE ARTS, A/V TECHNOLOGY, AND COMMUNICATIONS

ENDORSEMENT: BUSINESS & INDUSTRY

The Arts, A/V Technology, and Communications pathway offers two programs of study; Animation and A/V Production. This pathway focuses on careers in designing, producing, exhibiting, performing, writing, and publishing multimedia content including visual and performing arts and design, journalism, and entertainment services. Careers in the AAVTC Career Cluster require a creative aptitude, a strong background in computer and technology applications, a strong academic foundation, and a proficiency in oral and written communication.



A/V PRODUCTION

A/V PRODUCTION

Certifications Offered: Adobe Photoshop, Adobe Premier

- Principles of Arts, A/V Technology, and Communications
- Digital Media
- A/V Production I
- A/V Production II



ANIMATION

ANIMATION

Certifications Offered: Adobe Photoshop, Adobe Animate

- Principles of Arts, A/V Technology, and Communications
- Animation I
- Animation II
- Video Game Design



Business Management & Administration

BUSINESS MANAGEMENT & ADMINISTRATION

ENDORSEMENT: BUSINESS & INDUSTRY

Certifications Offered: Microsoft Office Specialist (MOS): Word

The Business Management and Administration Pathway focuses on careers in planning, organizing, directing, and evaluating business functions essential to efficient and productive business operations.

- Principles of Business, Marketing, and Finance
- Business Information Management I
- Business Information Management II
- Practicum in Business Management



Construction

CONSTRUCTION

ENDORSEMENT: BUSINESS & INDUSTRY

Certifications Offered: OSHA, NCCER-Carpentry, NCCER-Core

The Construction Pathway focuses on designing, planning, managing, building, and maintaining the built environment. Courses in this pathway provide an overview to the various fields of design and construction management.

- Principles of Construction
- Construction Technology I
- Construction Technology II
- Practicum in Construction Technology



Education & Training

EDUCATION AND TRAINING

ENDORSEMENT: PUBLIC SERVICE

Certifications Offered: CPR/First Aid

The Education and Training pathway focuses on planning, managing, and providing education and training services and related learning support services. All parts of courses are designed to introduce learners to the various careers available within the Education and Training career cluster.

- Principles of Education and Training
- Human Growth and Development
- Instructional Practices
- Practicum in Education and Training





Criminal Justice

CRIMINAL JUSTICE

ENDORSEMENT: PUBLIC SERVICE

The Criminal Justice pathway has two programs of study; Legal Studies and Law Enforcement. This pathway focuses on planning, managing, and providing legal services, public safety, protective services, and homeland security, including professional and technical support services. Students will examine the roles and responsibilities of police, courts, corrections, private security, and protective agencies of fire and emergency services.



LAW ENFORCEMENT

LAW ENFORCEMENT

Certifications Offered: CPR/First Aid

- Principles of Law Public Safety, and Correctional Services
- Law Enforcement I
- Law Enforcement II
- Federal Law Enforcement and Protective Services



LEGAL STUDIES

LEGAL STUDIES

Certifications Offered: CPR/First Aid

- Principles of Law Public Safety, and Correctional Services
- Law Enforcement I
- Court Systems and Practices
- Federal Law Enforcement and Protective Services

FOCUS:

This pathway focuses on planning, managing, & providing legal services, public safety, protective services, & homeland security, including professional and technical support services.





Information Technology

INFORMATION TECHNOLOGY

ENDORSEMENT: BUSINESS & INDUSTRY

Certifications Offered: CompTIA A+, CompTIA Networking+, Dell Technician, CompTIA CySA+

The Information Technology pathway focuses on building linkages in IT occupations for entry level, technical, and professional careers related to the design, development, support, and management of hardware, software, multimedia, and systems integration services. This program will focus on Cyber Security.

- Principles of Information Technology
- Computer Maintenance
- Networking
- Computer Technician Practicum



Cosmetology

COSMETOLOGY

ENDORSEMENT: PUBLIC SERVICE

Certifications Offered: Barbicide, State Board Facial, Powder Dip Nails, Acrylic Nails, Microderm Abrasion, Eyelash Extension, TDLR License

The Cosmetology pathway focuses on preparing individuals for employment in personal care services. Students acquire the knowledge and skills necessary to obtain state licensure through The Texas Department of Licensing and Regulation (TDLR).

- Principles of Cosmetology
- Introduction to Cosmetology
- Cosmetology I
- Cosmetology II





HEALTH SCIENCE

ENDORSEMENT: PUBLIC SERVICE

The Health Science pathway offers two programs of study; Medical Assistant and Pharmacology. To pursue a career in the health science industry, students should learn to reason, think critically, make decisions, solve problems, and communicate effectively. Students should recognize that quality health care depends on the ability to work well with others.



MEDICAL ASSISTANT

MEDICAL ASSISTANT

Certifications Offered: OSHA, CPR/First Aid, PCT-Patient Care Technician, CET-EKG Technician, CPT-Phlebotomy Technician

- Principles of Health Science
- Medical Terminology
- Health Science Theory and Health Science Clinical
- Practicum in Health Science I



PHARMACOLOGY

PHARMACOLOGY

Certifications Offered: OSHA, CPR/First Aid, PCT-Patient Care Technician, CET-EKG Technician, CPT-Phlebotomy Technician, CPhT-Pharmacy Technician

- Principles of Health Science
- Medical Terminology
- Pharmacology
- Practicum in Health Science I



FOCUS:

To pursue a career in the health science industry, students should learn to reason, think critically, make decisions, solve problems, and communicate effectively.



Culinary Arts, Hospitality & Tourism

HOSPITALITY & TOURISM

ENDORSEMENT: BUSINESS & INDUSTRY

Certifications Offered: Texas Friendly, CPR/First Aid, START Certified Guest Service Professional (CGSP), START Certified Guest room Attendant (CGSP), START Certified Front Desk Representative (CGSP)

The Hospitality and Tourism pathway focuses on the management, marketing, and operations of restaurants and other food/beverage services, lodging, attractions, recreation events, and travel-related services. Students learn knowledge and skills focusing on communication, time management, and customer service that meet industry standards. Students will explore the history of the hospitality

and tourism industry and examine characteristics needed for success in that industry.

- Principles of Hospitality and Tourism
- Travel and Tourism Management
- Hospitality Services
- Practicum in Hospitality Services

CULINARY ARTS

ENDORSEMENT: BUSINESS & INDUSTRY

Certifications Offered: Texas Friendly, ServSafe Food Handler, CPR/First Aid, ServSafe Food Managers, START Certified Kitchen Cook (CGSP), START Certified Restaurant Server

- Principles of Hospitality and Tourism
- Introduction to Culinary Arts
- Culinary Arts
- Practicum in Culinary Arts





Manufacturing



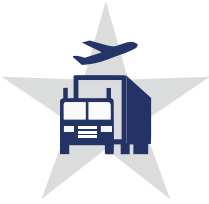
MANUFACTURING

ENDORSEMENT: BUSINESS & INDUSTRY

Certifications Offered: OSHA, AWS D9.1/D1.1; Tack, SMAW, GMAW, GTMAW

The Manufacturing (Welding) pathway focuses on planning, managing, and performing the processing of materials into intermediate or final products and related professional and technical support activities such as production planning and control, maintenance, and manufacturing/process engineering.

- Introduction to Welding
- Welding I
- Welding II
- Practicum in Manufacturing



Automotive Technology

AUTOMOTIVE TECHNOLOGY

ENDORSEMENT: BUSINESS & INDUSTRY

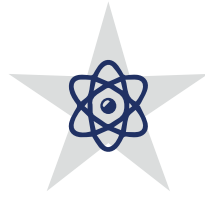
Certifications Offered: OSHA, Texas State Inspector License, ASE; Automobile Service Technology, Maintenance Light Repair, Electrical/Electronic Systems, Brakes, Suspension and Steering, Air Conditioning



The Automotive Technology pathway focuses on careers in planning, management, and movement of people, materials, and goods by road, pipeline, air, rail and water and related professional support services such as transportation infrastructure planning and management, logistics services, mobile equipment and facility maintenance.

- Automotive Basics
- Automotive Technology I: Maintenance and Light Repair
- Automotive Technology II: Automotive Service
- Practicum in Transportation Systems





STEM

ENDORSEMENT: STEM

The Science, Technology, Engineering, and Math (STEM) pathway offers two programs of study; Engineering and Computer Programming. This pathway focuses on planning, managing, and providing scientific research design and exploring solutions through hands on projects.



ENGINEERING/ ROBOTICS

ENGINEERING

- Introduction to Engineering Design
- Engineering Design and Presentation I
- Robotics
- Computer Integrated Manufacturing (CIM)
- Engineering Mathematics



COMPUTER PROGRAMING

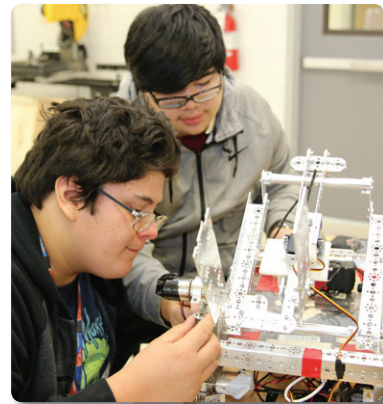
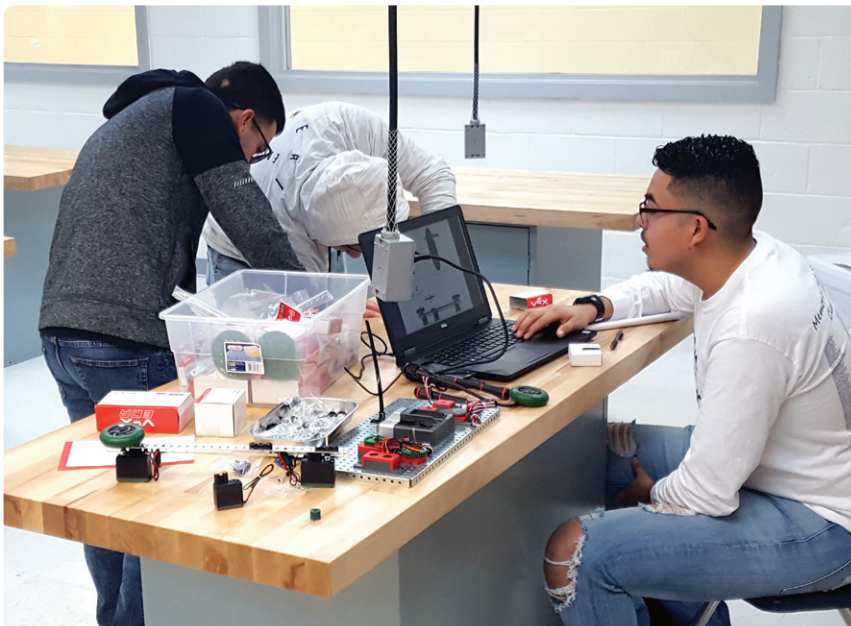
COMPUTER PROGRAMING

Certifications Offered: Solid Works

- Principles of Applied Engineering
- Computer Programming I
- Computer Programming II
- Engineering Mathematics

FOCUS:

This pathway focuses on planning, managing, and providing scientific research design and exploring solutions through hands on projects.



ADDITIONAL CTE COURSE OFFERINGS

Business Law
Career Preparation I
Career Preparation II
Dollars and Sense
Interpersonal Studies
Lifetime Nutrition and Wellness
Professional Communications



MIDDLE SCHOOL CTE

PROJECT LEAD THE WAY (PLTW):

- *App Creator*
- *Computer Science for Innovators and Makers*
- *Design and Modeling*
- *Automation and Robotics*
- *Flight and Space, Medical Detectives*
- *Science of Technology*
- Principles of Business, Marketing, and Finance,
- Principles of Arts, A/V Technology, and Communication
- Robotics





Notification of Non-Discrimination:

It is the policy of the Edgewood Independent School District not to discriminate on the basis of race, color, national origin, generally, handicap, or age in its employment practices, educational programs, services or activities, as required by law.

Edgewood Independent School District

District Improvement Plan

2019-2020

Accountability Rating: C



Mission Statement

Edgewood Independent School District provides an exceptional learning experience that engages, empowers and prepares students to compete and reach their highest potential in an ever-changing world.

Vision

For every child, success in life

Edgewood Proud!

Core Values and Guiding Principles

- **All students have value and can be successful.**
- **High expectations and positive relationships are vital for student success.**
- **All stakeholders should inspire students to love learning & reach their personal goals.**
- **Each student deserves a high quality, well-rounded, education (academic, social, life skills).**

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Goals

Goal 1: Student Achievement: Improve academic outcomes and prepare students to be career and college ready

Performance Objective 1: READING/WRITING




- The percent of students in grades K-3 reading on or above grade level will increase to 60% by the end of the school year 2020. (LSG Goal)




READING/WRITING

- Increase the percentage of students meeting Approaches Grade Level performance on STAAR Reading 3rd - 5th gr from 62% to 70%; Meets 25% to 40%; and Masters 9% to 10%, by the end of school year 2020.
- Increase the percentage of students meeting Approaches Grade Level performance on STAAR Reading 6th - 8th gr from 59% to 70%; Meets 27% to 40%; and Masters 10% to 13%, by the end of school year 2020.
- Increase the percentage of students meeting Approaches Grade Level performance on STAAR Reading (EOC ENG I/II) from 50% to 70%; Meets 16% to 40%; and Masters 2% to 10%, by the end of school year 2020.
- Increase the percentage of students meeting Approaches Grade Level performance on STAAR 4th grade Writing from 44% to 70%; Meets 17% to 40%; and Masters 3% to 10%, by the end of school year 2020.
- Increase the percentage of students meeting Approaches Grade Level performance on STAAR 7th grade Writing from 44% to 70%; Meets 18% to 40%; and Masters 5% to 10%, by the end of school year 2020.

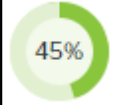



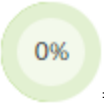

Evaluation Data Source(s) 1: The performance of this objective will be evaluated using READING: K-2 Star Renaissance, 3rd - HMH, STAAR data.

Summative Evaluation 1:

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
<p>Comprehensive Support Strategy Additional Targeted Support Strategy</p> <p>1) The implementation of the Balanced Literacy Framework (shared reading & writing, guided reading & writing, independent reading & writing) will provide K-5 students with opportunities to improve their skills in independent on-grade level reading & writing performance.</p> <p>Training on each component of balanced literacy will occur throughout the year.</p>	2.4, 2.5	Literacy Coordinators Literacy Coaches	<p>Increased student achievement results on benchmarks, STAAR, Star Learning and Early Literacy reports, common assessments, and appropriate formative assessments.</p> <p>The Quick Check for Learning will collect data on teachers use of the instructional routines embedded within Balanced Literacy.</p>				
<p>Comprehensive Support Strategy Additional Targeted Support Strategy</p> <p>2) The allocation of additional time within the instructional day to support tier II and tier III small group instruction and intervention in grades K-5.</p>	2.4	Literacy Coordinators Literacy Coaches	<p>Increased student achievement results on benchmarks, STAAR, Early Literacy and Star Learning reports, common assessments, and appropriate formative assessments.</p>				
<p>Comprehensive Support Strategy Additional Targeted Support Strategy</p> <p>3) Students will participate in Tier II & Tier III targeted reading interventions to improve the overall reading and comprehension through additional time in small group instruction based on</p> <p>6th-8th Achieve 3000 6th - 12th push-ins and pull-out intervention Mentoring Minds, Think It Up, is a resource that will support intervention in the classroom.</p>		Literacy Coordinator Literacy and Content Coaches	<p>Increased student achievement results on benchmarks, Achieve 3000 reports, common assessments, and appropriate formative assessments.</p>				
<p>4) Resources and professional development will be provided to teachers on the utilization of the new ELAR/SLAR TEKS and instructional resources-HMH adoption, reading development and strategies to optimize student acquisition of necessary skills while also meeting them at their current reading level.</p>	2.4, 2.5	Literacy Coordinators Literacy Coaches	<p>Increased student achievement results on benchmarks, NSGRA, STAAR, Early Literacy, Star Learning reports, common assessments, and appropriate formative assessments.</p>				

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
5) K - 12 Students will use web-based instructional materials to increase access to a wide variety of texts written at the full range of reading levels in every genre. Through this platform students can engage in individualized learning experiences.	2.4, 2.5	Literacy Coordinators Literacy Coaches Content Coaches	Increased student achievement results on benchmarks, STAAR, Star Literacy and Early Learning reports, common assessments, and appropriate formative assessments.				
	Problem Statements: Student Academic Achievement 3 - School Processes & Programs 1						
6) Students will engage in learning experiences that integrate reading, writing, speaking, and thinking. Teachers will experience district training in lesson planning that supports the integration of reading and writing TEKS and the selection of strategies that help students make deeper connections around author's craft, as readers and writers. Coaches will support the ongoing application of these goals in campus-based planning sessions and PLC conversations.	2.4, 2.5	Literacy Coordinators Literacy Coaches Content Coaches	Increased student achievement results on benchmarks, NSGRA, STAAR, Istation reports, common assessments, and appropriate formative assessments.				
	Problem Statements: Student Academic Achievement 1, 3, 5 Funding Sources: 199 - State Compensatory PIC 30 - 0.00						
7) 6-12 Students will have access to and utilize classroom libraries for independent reading. Teachers will receive ongoing training and support in improving students' fluency and comprehension through independent reading. In grades 6-8, Lexile levels will be monitored through Achieve 3000, and independent reading will be adjusted based on data.	2.4, 2.5	Literacy Coordinators Literacy Coaches Content Coaches	Increased student achievement results on benchmarks, STAAR, Achieve reports, common assessments, and appropriate formative assessments.				
	Problem Statements: Student Academic Achievement 1, 3						

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
<p>8) Standards-based planning will be used in all grade levels.</p> <p>The district will create Unit Resource Guides and Module Resource Guides that bridge TEKS RS Curriculum and district resources, as well as provide exemplar learning targets and activities.</p> <p>A Purposeful Planning Protocol will be used in all planning sessions, to ensure backward design in planning.</p> <p>Teachers' lesson plans and instructional delivery will be monitored for alignment to the unit's TEKS and rigor thereof.</p> <p>Engaging strategies included in the district-created Unit Resource Guides (URGs) and Module Resource Guide should be used to improve student learning.</p> <p>Unit tests will be used to plan, and formative assessments for mid-checks points will be created. Differentiation for all student groups will also be part of the planning.</p>	2.4, 2.5	Literacy Coordinators Literacy Coaches	Increased student achievement results on benchmarks, STAAR, common assessments, and formative assessments.				
<p>Funding Sources: 199 - State Compensatory PIC 30 - 0.00</p>							

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
<p>9) Unit and module assessments will be created and administered along with SpringBoard assessments for each unit, in grades K-12.</p> <p>Teachers and coaches will use a district Data Analysis protocol to analyze trends and patterns.</p> <p>The protocol will ensure that instructional plans are made to intervene through Tier 1 and Tier 2 instruction.</p> <p>Teachers will revise lesson planning based on data analysis protocol.</p> <p>Data Analysis will occur after every unit test and should include analysis of student writing.</p>	2.4, 2.6	Literacy Coordinators Literacy Coaches	Increased student achievement results on benchmarks, STAAR, common assessments, and formative assessments.				
<p>Problem Statements: Student Academic Achievement 3 Funding Sources: 199 - State Compensatory PIC 30 - 0.00</p>							
<p>TEA Priorities Recruit, support, retain teachers and principals</p> <p>10) Coordinators, Coaches, and District administrators will participate in methods of professional development activities to improve effective leadership and instructional strategies.</p>	2.5	Teaching and Learning Director	Increased student achievement results on benchmarks, STAAR, and formative assessments.				
<p>Problem Statements: Student Academic Achievement 1, 3 Funding Sources: 211 - Title I - 10000.00, 429-SSI Community Partnership Grant - 50000.00</p>							
<p>11) Professional Development to support teachers and coaches on the Reading and Writing workshop model in order to support literacy and utilization of the new instructional materials.</p>	2.4, 2.5	K-5 Literacy Coordinator	Increased reading levels, module assessment data, benchmark data, and STAAR,				
<p>Funding Sources: 199 - State Compensatory PIC 30 - 8000.00</p>							
<p>12) Professional development and resources will be provided to teachers and literacy coaches on the utilization, implementation, and strategies to optimize student acquisition of necessary writing skills while also meeting them at their current writing developmental stage.</p>	2.4, 2.5	K-5 Literacy Coordinator Literacy Coaches	Increase student achievement results on formative, module, and STAAR writing assessments.				
<p>  = Accomplished  = Continue/Modify  = No Progress  = Discontinue </p>							

Performance Objective 1 Problem Statements:

Student Academic Achievement

Problem Statement 1: 2018: Only 58% of K-3rd grade students were reading at grade level by the end of the 2018 school year. **Root Cause 1:** The majority of EISD students are entering first grade at a "beginning reader" level and are not ready for independent reading.

Problem Statement 3: The percentage of students in grades 3-5 who meet Approaches Grade Level standard or above on 2019 reading STAAR is 62%, and the percentage of students in grades 6-8 who meet Approaches Grade Level standard or above on reading STAAR is 59%. **Root Cause 3:** Ineffective Tier instruction due to lack of professional development for campus staff in teaching to the standards and implementing rigorous TEKS instruction. Ineffective ELAR interventions for Tier 3 and 2 students due to low usage, lack of fidelity to the program, and lack of monitoring.

Problem Statement 5: The Four-Year Longitudinal Graduation Rate (Graduated, Continued in School, or Received GED) is 91.9% (Class of 2018 reported in 2019) compared to the state average of ____% **Root Cause 5:** Tier 1 Instruction needs improvement in pedagogical implementation, content-deepening, and cultural relevance in all areas emphasizing literacy, math.

School Processes & Programs

Problem Statement 1: Kinder Readiness data indicate that only 32% of the students were performing on level. **Root Cause 1:** Analysis of data indicates that teachers are not effectively differentiating classroom instruction based on the results from student data.



Goal 1: Student Achievement: Improve academic outcomes and prepare students to be career and college ready

Performance Objective 2: EARLY LITERACY

- Increase the percentage of students scoring at least 20 of 28 points on the Phonological Awareness section of the Center for Improving Readiness of Children for Learning and Education (CIRCLE) assessment from 85% to 93%.
- The percentage of students in Pre-K 4 who are on track in Letter Naming will reach 85% (CIRCLE).
- The Lone Star Governance goal in literacy is to increase the percentage of students in grades K-3 who are reading on or above grade level from 54% to 64% by the end of school year 2022. The 2020 target is 60%.
- The percentage of students in grades K and 1 who are reading on or above grade level will increase from 55% to 59% by the end of school year 2020.
- The percentage of students in grade 2 who are reading on or above grade level will increase from 51% to 61% by the end of school year 2020.
- The percentage of students in grade 3 who are reading on or above grade level will increase from 55% to 57% by the end of school year 2020.

Evaluation Data Source(s) 2: The performance of this objective will be evaluated using CIRCLE and STAAR Early Literacy (K-1), STAAR Reading (2nd), and HMH Growth measure (3-5) results.

Summative Evaluation 2:

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
1) Pre-kindergarten students will participate in progress monitoring of literacy skills from the administration of CIRCLE (4 year old) and Learning Accomplishment Profile (3 year old) V.3 (LAP 3).		Early Childhood Director	Increased student performance on the CIRCLE, end of year assessment, improve LAP performance and increase kinder readiness				
<p>Comprehensive Support Strategy Additional Targeted Support Strategy</p> <p>2) K - 2nd grade students will take the IStation Indicators of Progress (ISIP) monthly assessment to measure the student's reading ability and skill development over time. Students will participate in IStation's intervention curriculum based on their individual responses and tiers: Tier 3 - 90 minutes or more Tier 2 - 60 minutes or more Tier 1 - 30 minutes or more Pre-K students will utilize Istation based on their developmental needs.</p>		Literacy Coordinator	Increase student performance on beginning-of-year (BOY), middle-of-year (MOY), end-of-year (EOY) iStation reports, reduce the number of students needing tier three services in reading				
<p>Funding Sources: 199 - State Compensatory PIC 30 - 70000.00</p>							

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
3) Pre-K students will engage in developmentally appropriate lessons that incorporate the Prekindergarten Guidelines (social and emotional development, language and communication, emergent literacy reading and writing, science, and social studies) to ensure Kindergarten Readiness.		Site Managers / Principals	Increase student performance on CIRCLE EOY to increase kinder readiness				
4) Provide Kinder Camp at the end and before the beginning of the school year to support struggling students.		Early Childhood Director	Increased kinder readiness				
= Accomplished = Continue/Modify = No Progress = Discontinue							



Goal 1: Student Achievement: Improve academic outcomes and prepare students to be career and college ready







Performance Objective 3: MATHEMATICS







- Increase the percentage of students meeting Approaches Grade Level performance on STAAR Math 3rd - 5th gr Math from 64% to 70%; Meets 28% to 40%; and Masters 9% to 12%, by the end of school year 2020.
- Increase the percentage of students meeting Approaches Grade Level performance on STAAR Math 6th - 8th gr (ALG I) from 64% to 70%; Meets 27% to 40%; and Masters 12% to 15%, by the end of school year 2020.
- Increase the percentage of students meeting Approaches Grade Level performance on STAAR HS ALG I from 69% to 74%; Meets 40% to 45%; and Masters 21% to 26%, by the end of school year 2020.
- Increase to at least 85% of students on level in early Pre-K math skills (CIRCLE) with an average score of 22 out of 28.
- Increase end-of-year percentage of students on level in math skills Kindergarten through 1st Grade from 77% to 83% (TEMI) in 2018-2019.

Evaluation Data Source(s) 3: The performance of this objective will be evaluated using 2019-2020 STAAR Scores; The performance of this objective will be evaluated using CIRCLE, TEMI, ESTAR, MSTAR, ESTAR/MSTAR Diagnostic Assessment results.

Summative Evaluation 3:

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
Comprehensive Support Strategy Additional Targeted Support Strategy 1) Students will use mathematical processes to acquire and demonstrate a district problem solving model that incorporates analyzing, planning, solving, and justifying/evaluating.	2.4, 2.6	District Math Coordinator and Mathematics Content Coaches	Increased student achievement on unit/common assessments, benchmarks, STAAR, and performance tasks that indicate a problem solving model is utilized				
Funding Sources: 199 - State Compensatory PIC 30 - 1000.00							
Comprehensive Support Strategy Additional Targeted Support Strategy 2) Students will use web-based instructional materials and other technology to create individualized pathways for students that will strengthen conceptual understanding and mathematics proficiency.	2.4, 2.5, 2.6	District Math Coordinator and Math Content Coaches	Increased student performance on unit/common assessments, benchmarks, STAAR, and software performance data				
Funding Sources: 199 - State Compensatory PIC 30 - 20679.00							

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
Comprehensive Support Strategy Additional Targeted Support Strategy 3) Students will receive targeted math instruction to support TIER II and TIER III intervention based on performance on universal screener and diagnostic assessment administration at BOY, MOY, and EOY.	2.6	District Math Coordinator and Math Content Coaches	Increased student progress in number sense, quantitative reasoning skills, and algebra-readiness from the appropriate intervention (TEMI, ESTAR/MSTAR Universal Screener and Diagnostic Assessments)				
	Funding Sources: 199 - State Compensatory PIC 30 - 8000.00						
4) Pre-kindergarten students will participate in progress monitoring of early math skills from the administration of CIRCLE.		Early Childhood Director	Increased student achievement results on CIRCLE, and BOY, MOY, EOY assessments				
5) Students will engage in mathematics tasks that provide multiple entry points to learning and embed the process standards.	2.4, 2.5, 2.6	District Math Coordinator and Math Content Coaches	Increased student achievement results on common assessments, benchmarks, performance assessments, and STAAR				
	Funding Sources: 199 - Local - 25000.00						
6) Students will engage in mathematics instruction designed around mathematics proficiency (conceptual understanding, productive disposition, procedural fluency, strategic competence, and adaptive reasoning).	2.4, 2.5, 2.6	District Math Coordinator and Math Content Coaches	Increased student achievement results on common assessments, benchmarks, performance assessments, and STAAR				
	Funding Sources: 199 - State Compensatory PIC 30 - 4000.00						
7) Students will engage in mathematics instruction with embedded literacy strategies through the use of mentor text directly aligned to the content and standards.	2.4, 2.5	District Math Coordinator and Math Content Coaches	Increased student achievement results in common assessments, benchmarks, performance assessments, STAAR, NSGRA				
	Funding Sources: 199 - State Compensatory PIC 30 - 40000.00						
8) Students in Pre-AP mathematics courses will engage in a differentiated curriculum aligned to the Advanced Placement standards.	2.4, 2.5	District Math Coordinator and Math Content Coaches	Increased student enrollment in AP, DC, and DE mathematics courses and increased Masters level performance on STAAR				
	Funding Sources: 199 - Local - 30000.00						

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
<p>9) Standards-based planning will be used in all grade levels.</p> <p>The district will create Unit Resource Guides that bridge TEKS RS Curriculum and district resources, as well as provide exemplar learning targets and activities.</p> <p>A Purposeful Planning Protocol will be used in all planning sessions, to ensure backward design in planning.</p> <p>Teachers' lesson plans and instructional delivery will be monitored for alignment to the unit's TEKS and rigor thereof.</p> <p>Engaging strategies included in URG should be used to improve student learning.</p> <p>Unit tests will be used to plan, and formative assessments for mid-checks points will be created. Differentiation for all student groups will also be part of the planning.</p>	2.4, 2.5, 2.6	District Math Coordinator, Math Content Coaches, and Administration	Increased student achievement results on benchmarks, STAAR, common assessments, and formative assessments.				
Funding Sources: 199 - State Compensatory PIC 30 - 49560.00							
<p>10) Professional development and content videos will be provided to increase teacher content knowledge of the TEKS and conceptual development of mathematics.</p> <p>Professional development will be provided to teachers per grade level to deepen their content understanding.</p>	2.4, 2.6	District Math Coordinator, Math Content Coaches, and Administration	Increased student achievement results on unit assessments, benchmarks, STAAR, and formative assessments.				
 = Accomplished  = Continue/Modify  = No Progress  = Discontinue							

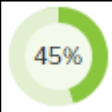
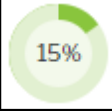

Goal 1: Student Achievement: Improve academic outcomes and prepare students to be career and college ready





Performance Objective 4: SCIENCE


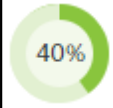





- Increase the percentage of students at Approaches Grade Level performance on STAAR Science (All Tested Grade Levels) from 64% to 70%; Meets Grade Level performance from 30% to 40%; and Masters Grade Level performance from 8% to 10%, by the end of school year 2020.
- Increase the percentage of students meeting Approaches Grade Level performance on STAAR 5th grade Science from 52% to 70%; Meets Grade Level performance from 23% to 40%; and Masters Grade Level performance from 7% to 10%, by the end of school year 2020.
- Increase the percentage of students meeting Approaches Grade Level performance on STAAR 8th grade Science from 61% to 70%; Meets Grade Level performance from 27% to 40%; and Masters Grade Level performance from 9% to 11%, by the end of school year 2020.
- Increase the percentage of students at Approaches Grade Level performance on STAAR Biology EOC from 76% to 80%; Meets Grade Level performance from 38% to 40%; and Masters Grade Level performance on from 7% to 10%, by the end of school year 2020.

Evaluation Data Source(s) 4: The performance of this objective will be evaluated using 2019-2020 STAAR scores.

Summative Evaluation 4:

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
1) Students will participate in inquiry investigations and use science tools to collect data. Unit Resource Guides will be developed to include engaging lab investigations from STEMScopes with the integrating of literacy strategies.	2.4, 2.5, 2.6	Science Coordinator and Content Coaches	Increased student achievement results on unit assessments, benchmarks, and STAAR reports.				
	Funding Sources: 410 - Instructional Materials Allotment IMA - 55829.00						
2) Students will integrate writing with science investigations by using Claim, Evidence, and Reasoning structure to draw conclusions and support scientific reasoning.		Science Coordinator and Content Coaches	Increased student achievement results on unit assessments, benchmarks, STAAR and Laserfiche reports.				
	Funding Sources: 199 - State Compensatory PIC 30 - 0.00						
3) Students will participate in Science, Technology, Engineering, and Mathematics (STEM) connections through Project Based Learning (PBL) that includes problem solving skills with real world applications such as attending Star Base Kelly and use of Ozobots.		Science Coordinator and Content Coaches	Increased student engagement in effective lab investigations.				
	Funding Sources: 199 - State Compensatory PIC 30 - 4000.00						

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
4) Teachers will utilize Region 20 living science materials to support engaging science experiences.		Science Coordinator and Content Coaches	Increased student achievement results on unit assessments, benchmarks, STAAR and reports.				
Funding Sources: 255 - Title II - 27036.80							
5) Teachers will integrate literacy and inquiry investigations by conducting read-alouds with NSTA science picture book collections.		Science Coordinators and Content Coaches	Increased performance in NSGRA, and unit assessments.				
Funding Sources: 199 - Local - 20687.13							
6) Pre-K teachers will incorporate science inquiry and discovery into weekly science instruction through the use of STEMscopes and outdoor learning experiences.		Literacy Coaches	Improved vocabulary and kinder readiness				
7) Standards-based planning will be used in all grade levels. The district will create Unit Resource Guides that bridge TEKS RS Curriculum and district resources, as well as provide exemplar learning targets and activities. A Purposeful Planning Protocol will be used in all planning sessions, to ensure backward design in planning. Teachers' lesson plans and instructional delivery will be monitored for alignment to the unit's TEKS and rigor thereof. Engaging strategies included in URG should be used to improve student learning. Unit tests will be used to plan, and formative assessments for mid-checks points will be created. Differentiation for all student groups will also be part of the planning.	2.4, 2.5, 2.6	Science Coordinator and Content Coaches	Increased student achievement results on benchmarks, STAAR, common assessments, and formative assessments.				

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
<p>8) Unit assessments will be created and administered for grades 3 - 12.</p> <p>Teachers and coaches will use a district Data Analysis protocol to analyze trends and patterns.</p> <p>The protocol will ensure that instructional plans are made to intervene through Tier 1 and Tier 2 instruction.</p> <p>Teachers will revise lesson planning based on data analysis protocol.</p> <p>Data Analysis will occur after every unit test and should include analysis of student writing.</p>	2.4, 2.5, 2.6	Science Coordinator and Content Coaches	Increased student achievement results on benchmarks, STAAR, common assessments, and formative assessments.				
<p>9) 6-12 students will utilize Vernier probeware to conduct engaging lab investigations with authentic data collection and analysis to support process skills.</p>	2.4, 2.5, 2.6	Science Coordinator and coaches	Increased student achievement results on benchmarks, STAAR, common assessments, and formative assessments.				
<p>10) Teachers will participate in professional development to support vertical alignment in the development of TEKS Clusters at each grade level. Grade-level investigations will be identified and included in the Unit Resource Guides. Instructional strategies will be modeled to support the transfer of the learning from the taught to the tested. Teachers will analyze how concepts are tested on STAAR and plan how to address them in instruction.</p>	2.4, 2.5, 2.6	Science Coordinator and coaches	Increased student achievement results on benchmarks, STAAR, common assessments, and formative assessments.				
 = Accomplished  = Continue/Modify  = No Progress  = Discontinue							

Goal 1: Student Achievement: Improve academic outcomes and prepare students to be career and college ready


Performance Objective 5: SOCIAL STUDIES

- Increase the percentage of students Approaching Grade Level Standard on STAAR Social Studies (All Tested Grade Levels) from 68% to 70%; Meets Grade Level Standard from 42% to 45%; and Masters Grade Level performance from 20% to 22%, by the end of the school year 2020.
- Increase the percentage of students Approaching Grade Level Standard on STAAR 8th Grade Social Studies from 40% to 70%; Meets Grade Level Standard from 13% to 40%; and Masters Grade Level performance from 3% to 10%, by the end of the school year 2020.
- Increase the percentage of students Approaching Grade Level Standard on STAAR US History EOC from 90% to 95%; Meets Grade Level Standard from 65% to 70%; and Masters Grade Level performance from 33% to 40%, by the end of the school year 2020.

Evaluation Data Source(s) 5: The performance of this objective will be evaluated using 2019-2020 STAAR Scores.

Summative Evaluation 5:

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
Comprehensive Support Strategy Additional Targeted Support Strategy 1) Students will engage in Social Studies instruction designed around process standards by incorporating stimuli, varied instructional strategies, and dual coded STAAR based assessment questions in order to increase critical thinking and problem solving skills.		Director of Teaching and Learning & Social Studies Content Coaches	Increased student achievement results on common assessments, benchmarks, performance assessments, and STAAR.				
	Funding Sources: 199 - State Compensatory PIC 30 - 50840.00						
Comprehensive Support Strategy Additional Targeted Support Strategy 2) Students will build literacy, writing, critical thinking and observation skills through the use of primary source readers, reader's theatre and the analysis of primary sources and other stimuli, in order to deepen their understanding of social studies in grades K-12.		Director of Teaching and Learning & Social Studies Content Coaches	Increased student achievement results on common assessments, benchmarks, performance assessments, and STAAR.				
	Funding Sources: 199 - State Compensatory PIC 30 - 24000.00						
Comprehensive Support Strategy Additional Targeted Support Strategy 3) Students will participate in the analysis of stimuli and discourse in order to engage in evidence-based argumentation and document-based analytical writing.		Director of Teaching and Learning & Social Studies Content Coaches	Increased student achievement results on common assessments, benchmarks, performance assessments, and STAAR.				
	Funding Sources: 199 - State Compensatory PIC 30 - 200.00						

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
Comprehensive Support Strategy 4) Social Studies teachers will engage in instructional planning that is aligned to the cognitive level of the TEKS, ensuring that they address the historical details, while also addressing broader conceptual themes.		Director of Teaching and Learning & Social Studies Content Coaches	Increased student achievement results on common assessments, benchmarks, performance assessments, and STAAR.				
	Funding Sources: 199 - State Compensatory PIC 30 - 850.00						
5) Students will participate in activities and performance tasks that provide engaging experiences in Social Studies lessons for grades K-12.		Director of Teaching and Learning & Social Studies Content Coaches	Increased student achievement results on common assessments, benchmarks, performance assessments, STAAR.				
	Funding Sources: 199 - State Compensatory PIC 30 - 0.00						
6) K-3rd grade will integrate Social Studies content and concepts within the literacy curriculum. The integrated curriculum to will be aligned to standards and literacy content.	2.4, 2.5, 2.6	Director Teaching and Learning, Social Studies Coach	Impact to STAAR results				
7) Professional development will be provides to teachers using the DBQ resources and TCI, Teachers Curriculum Institute to support lesson delivery.	2.4, 2.5	Director Teaching and Learnin	Impact to STAAR EOC				
	Funding Sources: 199 - State Compensatory PIC 30 - 15000.00						
							






Goal 1: Student Achievement: Improve academic outcomes and prepare students to be career and college ready

Performance Objective 6: INSTRUCTIONAL TECHNOLOGY

Student Achievement: Increase digital learning activities and information access to promote collaboration, creativity, innovation and critical thinking.

Evaluation Data Source(s) 6: Technology integrated lessons and technology products.

Summative Evaluation 6:

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
Additional Targeted Support Strategy 1) Students in K - 8 will participate in engaging Technology Applications lessons for the purpose of improving reading, math, writing, science and social studies instruction.		Instructional Technology Team	Technology products created by students. 5th & 8th grade students will complete their Tech Apps Assessment.				
	Funding Sources: 410 - Instructional Materials Allotment IMA - 67500.00, 211 - Title I - SIG (School Improvement Grant) - 160000.00						
Comprehensive Support Strategy Additional Targeted Support Strategy 2) Students will participate in viable technology lessons that support, extend and enhance the core content area lessons.		Instructional Technology Team	Technology products created by students Student Technology Exposition				
	Funding Sources: 410 - Instructional Materials Allotment IMA - 67500.00, 211 - Title I - SIG (School Improvement Grant) - 160000.00						
Comprehensive Support Strategy Additional Targeted Support Strategy 3) Instructional Technology Team will collaborate with Instructional Coordinators to enhance lessons with technology integration in order to bring relevance and real world connections to classroom lessons.		Instructional Technology Team	Increased number of technology integrated lessons available in the district's curriculum.				
	Funding Sources: 410 - Instructional Materials Allotment IMA - 67500.00, 211 - Title I - SIG (School Improvement Grant) - 160000.00						
4) Instructional Technology Team will plan, model lessons, and/or co-teach with classroom teachers to assist in the integration of technology as a learning tool.		Instructional Technology Team	Classroom Walk-through and Co-Teach Lesson Plans Increase the number of teachers integrating technology in their lessons Increase in student created digital products				
	Funding Sources: 410 - Instructional Materials Allotment IMA - 67500.00, 211 - Title I - SIG (School Improvement Grant) - 160000.00						
5) Digital Coordinator will support and promote implementation of technology in school operations through training/coaching.		Director of Technology	Increase number of training sessions Classroom Observations				
	Funding Sources: 211 - Title I - 93200.00						

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June


Goal 1: Student Achievement: Improve academic outcomes and prepare students to be career and college ready

Performance Objective 7: PHYSICAL EDUCATION

To enhance a students educational well-being by developing their physical and social skills through participation in interscholastic sports, physical education, and instilling life-time sports. Along with incorporating lifetime sports, a knowledge of personal health and well-being will also be a part of instruction.

Evaluation Data Source(s) 7: Increased successful student participation in athletic programs and continued monitoring of physical skills and overall well-being. Increase student participation.

Summative Evaluation 7:

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
1) Students will participate in strength, conditioning, agility, and skills building programs.		Campus Coordinator/Coaches	Measurement chart of student progress(Bigger, Faster, Stronger) Fitness Gram				
Funding Sources: 199 - Local - 50000.00							
2) Students will be provided the tools, resources and venues to successfully participate in the athletic program. Introduced a new physical education curriculum (SPARK). Teachers will continue to be trained in the new program		Campus Coordinator/PE Coaches and Athletic/Physical Education Department	Monthly evaluations on student progress Fitness Gram				
3) Students will be provided athletic equipment and hardware for successful participation in desired sport(s). Continue upkeep and maintenance of athletic and physical education venues.		Campus Coordinator/Athletic Coach/Athletic-Physical Education Department	Improve skill set in each sport				
							

Goal 1: Student Achievement: Improve academic outcomes and prepare students to be career and college ready

Performance Objective 8: CAREER & TECHNOLOGY EDUCATION


- Increase the number of Career and Technical Education students meeting Approaches Grade Level performance in EOC Math from 70% to 80%, Meets Standard will increase to 40%, and Masters Standard will increase to 10% by the end of the school year 2020.
- Increase the number of Career and Technical Education students meeting Approaches Grade Level performance in EOC English Language Arts from 58% to 70%, Meets Standard will increase to 40%, Masters Standard will increase to 10% by the end of the school year 2020.
- Increase the number of Career and Technical Education students meeting Approaches Grade Level performance in EOC Science from 78% to 85% Meets Standard will increase to 40%, and Masters Standard will increase to 10% by the end of the school year 2020.
- Increase the number of Career and Technical Education students meeting Approaches Grade Level performance in EOC Social Studies from 94% to 96%, Meets Standard will increase to 40%, and Masters Standard will increase 10% by the end of the school year 2020.
- Increase the number of Career and Technical Education Limited English Proficiency students meeting Approaches Grade Level performance in Math EOC from 72% to 80%, Meets Standard will increase to 40%, and Masters Standard will increase to 10% by the end of the school year 2020.
- Increase the number of Career and Technical Education Limited English Proficiency students meeting Approaches Grade Level performance in Science EOC from 71% to 75%, Meets Standard will increase to 40%, and Masters Standards will increase to 10% by the end of the school year 2020.
- Increase the number of Career and Technical Education Limited English Proficiency students meeting Approaches Grade Level performance in Social Studies EOC from 82% to 86%, Meets Standard will increase to 40%, and Masters Standard will increase to 10% by the end of the school year 2020.
- Increase the number of Career and Technical Education Limited English Proficiency students meeting Approaches Grade Level performance in Language Arts EOC from 41% to 70%, Meets Standard will increase to 40%, and Masters Standard will increase to 10% by the end of the school year 2020.
- Increase the number of Career and Technical Education Economically Disadvantaged students meeting Approaches Grade Level performance in English Language Arts EOC from 56% to 70%, Meets Standard will increase to 40%, and Masters Standard will increase to 10% by the end of the school year 2020.
- Increase the number of Career and Technical Education Special Education students meeting Approaches Grade Level performance in Mathematics EOC from 47% to 79%, Meets Standard will increase to 40%, and Masters Standard will increase to 10% by the end of the school year 2020.
- Increase the number of Career and Technical Education Special Education in Science EOC from 47% to 70%, Meets Standard will increase to 40%, and Masters will increase to 10% by the end of the school year 2020.
- Increase the number of Career and Technical Education Special Education in Social Studies EOC from 59% to 70%, Meets Standard will increase to 40%, and Masters Standard will increase to 10% by the end of the school year 2020.
- Increase the number of Career and Technical Education Special Education in English Language Arts EOC from 21% to 70%, Meets Standard will increase to 40%, and Masters Standard will increase to 10% by the end of the school year 2020.

Evaluation Data Source(s) 8: PBMAS data results

Summative Evaluation 8:

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
1) CTE teachers will attend professional development to train in subject content areas in preparation for student industry based certifications and incorporate differentiation methods to address the different learning styles of students.		Senior Director of CCMR, CTE Compliance Administrator, CTE Specialist	Increase teacher content and pedagogy knowledge through professional development opportunities that will in turn, increase student achievement results on CBA, benchmarks, STAAR, Industry Based Certifications, campus walkthroughs and appropriate program assessments.				
Funding Sources: 199-CTE PIC 22 - 7000.00, 244 - CTE PIC 22 - 250.00							
2) CTE teachers will create Student Intervention Folders (SIF) consisting of work samples and student data.		CTE Specialist and CTE Compliance Administrator	Classroom Walkthroughs, SIF folder check				
3) CTE Specialist will work with CTE teachers to ensure that needs of special populations and all other students are met by providing assistance in lesson planning, and differentiation strategies and activities in the classroom.		Senior Director of CCMR, CTE Compliance Administrator, CTE Specialist	Increased student achievement results on STAAR and program assessments. Students will have a more self-motivated understanding on the importance of the content and successful completion of CTE coherent courses and/or CTE certifications				
Problem Statements: Student Academic Achievement 7							
Funding Sources: 244 - CTE PIC 22 - 81793.00							
4) High School students will have the opportunity to test for industry certifications related to their content area. Upon successful completion of content, Certificates of Completion for certain areas of instruction will be awarded.		Senior Director of CCMR, CTE Compliance Administrator, CTE Specialist	Increased student achievement in CTE courses and EOC; Number of certifications and certificates of completion				
Funding Sources: 199-CTE PIC 22 - 8000.00							
5) Enhance student learning experiences through up-to-date, program supplies, innovative materials and equipment for teachers and students that will prepare students for career and industry based certifications and career ready industry standards; Expand student hands on learning through opportunities through Career & Technical Student Organizations regional and state leadership conferences.		Senior Director of CCMR, CTE Compliance Administrator, CTE Specialist; Campus Principals	Increased student knowledge and performance on industry based certifications through industry based resources.				
Funding Sources: 244 - CTE PIC 22 - 25786.00, 199-CTE PIC 22 - 11000.00							
6) CTE Teachers will develop an advisory committee for each CTE cluster and meet a minimum of two times during the year for collaboration and input from industry, continuing education, students, parents.		Senior Director of CCMR, CTE Compliance Administrator, CTE Specialist	Align curriculum to current industry standards; Expand industry certifications; Improve strategies for workplace readiness.				
Funding Sources: 199-CTE PIC 22 - 1500.00							

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
7) Improve facility standards in auto shop to meet NATEF/ASE standards for student workforce readiness and increased industry certifications; work with consultant for ASE auto shop certification to meet required standards.		CTE Director, Campus Principal,	Increased student workforce readiness; Increased student industry certifications in ASE.				
	Funding Sources: 199-CTE PIC 22 - 2500.00						
8) Expand cosmetology facility lab to meet student numbers preparing for operator license in compliance with TDLR regulations.		CTE Director, Campus Principal	Increased student numbers in completing TDLR 1000 hour requirement; Increased student workforce readiness standards passing rate for Cosmetology License.				
	Funding Sources: 244 - CTE PIC 22 - 0.00, 199-CTE PIC 22 - 0.00						
9) Expand culinary learning labs to increase hands on opportunities for culinary programs.		Senior Director of CCMR, CTE Compliance Administrator, CTE Specialist, Redesign Grant Administrator, Campus Principal	Enhance student opportunities in hands on lab experiences in preparation for workforce readiness standards.				
	Funding Sources: 211 - School Redesign Grant Local Code - ECS - 150000.00						
10) Increase student opportunities and interests in STEM pathways in middle schools by expanding programs to include ProjectLead the Way courses and teacher professional development; students will have opportunities for hands on lab experiences in PLTW courses for high school credits and participate in Core4STEM.		CTE Director, Campus Principal, PLTW Teachers	Increased student achievement in science and math; increased student interest in STEM pathways that continue in high school				
	Funding Sources: 199 - Local - 22000.00						
11) Elementary, Middle School, and high school students will have opportunities to participate in Robotics and increase learning opportunities that relate to science, technology, engineering and math programs of study.		Senior Director of CCMR, CTE Compliance Administrator, CTE Specialist; Campus Principals	Increased student interest and connected learning to technology, engineering, math, and science; Improve student attendance and family participation in training and competition events				
	Funding Sources: 199 - Local - 25000.00						
12) Promote CTE programs at all campus levels utilizing promotional materials about programs; Conduct program reviews and evaluations utilizing CTE program consultants to enhance promotional marketing.		CTE Director, CTE Specialist	Community and student awareness of program opportunities that lead to career and workforce readiness; increase student engagement and participation in CTE programs of study and industry recognized certifications.				
	Funding Sources: 244 - CTE PIC 22 - 3400.00, 199-CTE PIC 22 - 1580.00						

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
13) Conduct evaluation and program reviews utilizing CTE program consultants; Development of CTE program systems utilizing CTE program consultants to enhance student learning outcomes and college and career readiness, including industry certifications.		Senior Director of CCMR	Increased student interest and engagement in programs of study; Increase student strategies for engagement and participation in CTE programs of study and industry recognized certifications.				
Funding Sources: 244 - CTE PIC 22 - 2200.00							
14) Senior Director of CCMR/CTE and staff will monitor and work with CTE programs, systems, and teachers to ensure that program goals and student needs are met by providing planning strategies for programs and budget management.		Senior Director of CCMR, CTE Compliance Administrator, CTE Specialist	Increased student achievement in CTE programs of study; Increased student learning outcomes that lead to career and workforce readiness;				
Funding Sources: 199-CTE PIC 22 - 136859.00							
15) Prepare students through hands on experiences for Industry standards for on the job that include labs and real world learning, Include fostering the learning of technical skills and industry standards for labs by relating real-world attire, uniforms, professional dress, and training using industry supplies and equipment.		Senior Director of CCMR, CTE Compliance Administrator, CTE Specialist; Campus Principals	Increased student achievement in CTE programs of study; Increased student learning outcomes for workforce readiness.				
Funding Sources: 244 - CTE PIC 22 - 2878.34, 199-CTE PIC 22 - 1500.00							
<p>RDA</p> <p>TEA Priorities</p> <p>Recruit, support, retain teachers and principals Connect high school to career and college Improve low-performing schools</p> <p>16) Join Region-20 Cooperative for on-going supplemental support for professional development for CTE administration and teachers, curriculum development, pedagogy alignment, and alignment of program to changes of Programs of study.</p>	2.4, 2.6	Senior Director of CCMR, CTE Compliance Administrator, CTE Specialist	Increased student interest and engagement in programs of study; Increase student strategies for engagement and participation in CTE programs of study and industry recognized certifications.				
Funding Sources: 244 - CTE PIC 22 - 7875.00							
							

Performance Objective 8 Problem Statements:

Student Academic Achievement
<p>Problem Statement 7: 2018: The percent of college, career and military ready (CCMR) students is 30% with the percent of students prepared for the traditional college track below 20%.</p> <p>Root Cause 7: The majority of EISD students score well below the 50th percentile on PSAT/SAT and ACT assessments indicating many are not ready for college level work.</p>

Goal 1: Student Achievement: Improve academic outcomes and prepare students to be career and college ready

Performance Objective 9: MEASUREMENT & ASSESSMENT

Student Achievement: Implement an assessment program to measure student achievement and provide feedback on instruction.

Evaluation Data Source(s) 9: Compliance reports, assessments and program evaluations

Summative Evaluation 9:

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
Comprehensive Support Strategy Additional Targeted Support Strategy 1) Students will participate in assessments and benchmarks to monitor student progress in TEKS mastery throughout the year.		District Test Coordinator	Increased student achievement results on assessments and benchmarks.				
	Funding Sources: 199 - Local - 49000.00, 199 - State Compensatory PIC 30 - 130695.00						
Comprehensive Support Strategy Additional Targeted Support Strategy 2) Teachers and Instructional Coaches will have the opportunity to develop and review assessments.		Senior Executive Director Academic Services Instructional Coordinators	Increase in supplemental duty participants and submitted review forms.				
	Funding Sources: 211 - Title I - 20000.00						
= Accomplished = Continue/Modify = No Progress = Discontinue							







Goal 1: Student Achievement: Improve academic outcomes and prepare students to be career and college ready







Performance Objective 10: ATTENDANCE

The attendance rate will increase from 92.8% (report from PEIMS Dept.; however it is not official as of yet) to 95% by 2020.

Evaluation Data Source(s) 10: Will be updated once PEIMS reports on student attendance rates for 2019 are released.

Summative Evaluation 10:

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
1) Establish neighborhood partnerships with community members and local businesses to promote campaigns such as "Edgewood Proud". Signs and banners will be placed at businesses around the community.		Truancy/Hearing Officer	Review attendance data				
	Funding Sources: 199 - Local - 500.00						
2) The district will facilitate the development of Individual campus attendance plans which will be adjusted as needed.		Truancy/Hearing Officer	Completed plan and increased attendance.				
	Funding Sources: 199 - Local - 0.00						
3) The district will purchase intervention/monitoring software programs to assist campuses with timely interventions.		Executive Director of Educational Operations	Increased attendance percentages				
4) Family Support Workers, administrators, Head Start teachers and department staff will conduct home visits to discuss and monitor overall school attendance.		Early Childhood Director	Increased daily attendance, addressed social needs of chronically absent students				
	Funding Sources: 205 - Head Start - 200.00						
5) PEIMS Office and Attendance Office will collaboratively provide campuses with daily percentage of attendance.		PEIMS Office & Attendance Office	Campus will know their daily attendance and compare to their campus goal. Campuses can analyze the reason and adjust as needed.				
	Funding Sources: 199 - Local - 0.00						
6) District office celebrate campuses that reach 99% or above daily. Students will receive a small incentive and staff will receive a light breakfast.		Executive Director of Educational Operations	Campuses will increase the number of 99% or above days.				
	Funding Sources: 199 - Local - 600.00						

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
7) Attendance Team Meetings (ATM) will be conducted every 3 - 4 weeks to review any chronic student, follow up on services, and identify needed intervention for Head Start students.		Early Childhood Director	Improved student attendance, increased support of Family Service Workers to address family needs				
 = Accomplished  = Continue/Modify  = No Progress  = Discontinue							

Goal 1: Student Achievement: Improve academic outcomes and prepare students to be career and college ready

Performance Objective 11: COLLEGE, CAREER and Military READY

-The percent of 4-year longitudinal College Career and Military Ready Graduates will increase from 53% for the graduating class of 2018 (reported in July 2019) to 63% for graduating class of 2019 (reported in 2020).

Secondary Schools: Increase performance on Pre-Scholastic Aptitude Test (PSAT) - Scholastic Aptitude Test (SAT) - American College Testing (ACT) to meet the national average in 3 years; - Increase the percentage of students scoring a 3 or higher on Advanced Placement (AP) Exams from 15% to 25%.

Evaluation Data Source(s) 11: The performance of this objective will be evaluated using TAPR, College Board Reports, Achieve 300 reports, and Masters STAAR performance.


Summative Evaluation 11:

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
1) Students will participate in curricular knowledge in real world situations by participating in extra curricular activities such as: -UIL -Robotics -Chess - Fine Arts -Academic Decathlon -Athletics		Senior Director of CCMR/CTE, CTE Compliance Administrator, Fine Arts & Content Coordinators Athletics Director Advanced Academics	Student performance in extra curricular activities as evidenced by increased student performance on STAAR.				
Funding Sources: 199 - Local - 300000.00							
2) Students will be provided four credit by examination opportunities as required by state mandate.	2.4	Director of Guidance and Counseling and Testing Coordinator	Increase number of students receiving credit by exams				
Problem Statements: Student Academic Achievement 5							
Funding Sources: 199 - Local - 15000.00							

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
<p>TEA Priorities</p> <p>Connect high school to career and college</p> <p>3) Students in grades 8 through 12 will participate in a multi-tiered preparation system for the Texas Success Initiative assessment (TSIA). The system will include screeners, test preparation, materials and resources, and access to the TSIA. Students will demonstrate college readiness and registration readiness for successful enrollment in dual credit courses, Early College High School, and post-secondary enrollment</p>	2.4, 2.5, 2.6	Director of Advanced Academics Director of Guidance and Counseling	<p>Increase in the number of students who score college readiness on TSIA Reading, Writing and Math.</p> <p>Increase in the number of students who enroll in Dual Credit courses or Early College High School.</p> <p>Increase in the number of students who meet CCMR</p>				
	<p>Problem Statements: Student Academic Achievement 5, 7</p> <p>Funding Sources: 199 - Local - 35000.00, 199-CTE PIC 22 - 1500.00</p>						
<p>4) Students will participate in College and Career Readiness events to promote post-secondary education such as, Texas Association of Collegiate Registrars and Admission Officers (TACRAO) College Night , Financial Aid Night, Cafe College, college campus visits and college decision day.</p>	2.4, 2.6, 3.2	Director of Guidance and Counseling	Increase number of students applying to college				
	<p>Problem Statements: Student Academic Achievement 5, 7</p> <p>Funding Sources: 199 - Local - 5000.00</p>						
<p>5) Collaborate with agencies and organizations that deliver college, scholarship and financial aid resources.</p> <ul style="list-style-type: none"> - San Antonio Education Partnership - Project STAY - Good Samaritan Center - Upward Bound - Advise TX 	2.4, 2.6, 3.2	Director of Guidance and Counseling	Increased number of students applying to colleges and universities, increase the number of students completing the FAFSA, and increase the number of students applying for scholarships.				
	<p>Problem Statements: Student Academic Achievement 5, 7</p> <p>Funding Sources: 199 - State Compensatory PIC 30 - 20000.00, 199 - Local - 20000.00</p>						
<p>6) Students will use School Links, a college and career readiness platform with curriculum that engages students throughout the process of self-discovery. career exploration and college planning.</p>	2.4, 2.6	Director of Guidance and Counseling	Increased awareness of college and careers.				
	<p>Funding Sources: 199 - Local - 63500.00</p>						
<p>7) Utilizing sheltered instruction strategies, the LOTE teachers will implement the new LOTE TEKS emphasizing the modes of communication (interpretive, interpersonal and presentations) through the new adopted instructional materials.</p>		Curriculum Director	Student nine weeks grades and classroom walkthroughs				

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
8) Students in grades 8-12 will participate in a multi-tiered system of support for college readiness exams. This system includes test preparation, test preparation resources and materials, and access to the college readiness exams. Such as the SAT Suite of Assessments.		Advanced Academics Teaching and Learning	Increase the number of students who meet the college readiness standard/benchmark on the college readiness exams. Increase the number of students identified for the National Merit Program.				
	Problem Statements: Student Academic Achievement 7 Funding Sources: 199-High School Allotment PIC 31 - 65794.00						
9) Job-embedded professional development targeted to the GEAR UP cohort team provides support to improve instructional and meet the GEAR UP goals.		Academic Services Advanced Academics School Leadership	staff attendance				
	Funding Sources: 274 - GEAR UP Grant - 20050.00						
10) Career and College Readiness - GEAR UP Support campuses participating in the GEAR UP grant program to include: program implementation, assistance with data entries/requirements, supplemental materials/resources for college and career readiness activities		Director of Advanced Academics Advanced Academic Specialist	support provided to campus staff and students				
	Problem Statements: Student Academic Achievement 5, 7 Funding Sources: 274 - GEAR UP Grant - 40660.00						
11) College and Career Readiness - Early College High School Early College High School Implementation. Students in grades 9-12 have an opportunity to participate in the Early College High School in accordance to the TEA ECHS Blueprint. ECHS Campuses meet the design elements for each benchmark through the required activities and products.	2.4, 2.6	Academics Services Director of Advanced Academics	Increase the number of students earning an Associates Degree while in high school.				
		Director of Guidance and Counseling,	Increase the number of students earning at least 30 hours of college credit. Increase the number of students who meet College Career or Military readiness				
Problem Statements: Demographics 4 - Student Academic Achievement 5, 7							

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
TEA Priorities Recruit, support, retain teachers and principals 12) Recruit and retain highly qualified teachers to teach AP and Dual Credit courses that are rigorous and above grade level		Talent Management Academic Services Advanced Academics School Leadership	Increase the number of students enrolled in advanced courses. Increase in number of students earning a 3 or higher on AP subject area exams. Increase the number of students earning college credit through dual credit courses.				
	Problem Statements: Student Academic Achievement 7						
13) Advanced Learning Options K-12 - Increase access to accelerated curriculum and instruction by expanding the GT system, advanced coursework availability and enrollment in grades 6-12 , and students meeting college readiness benchmarks on assessments such as TSIA, AP, SAT Suite of Assessments.		Director, Advanced Academics Advanced Academics Specialist GT Coaches, AP Coaches	Increased participation in advanced courses. Increased number of students meeting CCMR. Increased number of student in the GT program.				
	Problem Statements: Demographics 3 - Student Academic Achievement 7 Funding Sources: 199-High School Allotment PIC 31 - 22206.00						
14) Advanced Learning Opportunities 8th - 12th grade Students will have the opportunity to engage in Dual Credit, Advanced Placement, Dual Enrollment and other advanced programs.		Director, Advanced Academics Advanced Academics Specialist	Increase the number of students who are participating in the Advanced Learning Opportunities. Increased student achievement and earned college credits.				
	2.4, 2.5, 2.6	Teaching and Learning	Increased student achievement				
15) Students will utilize the College Board developed materials, Springboard ELAR, to support all ELAR classes at JFK and BMS along with AP courses at all high schools, Wrenn and Gus.		Director Advanced Academics Advanced Academics Specialist AP Coaches GT Coaches	Increase in student performance				

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
17) College and Career Readiness - 6th grade students will participate in the AVID College and Career Readiness system focused on Instruction, Systems, Leadership and a College Going Culture. The AVID College Readiness system includes a college and career preparation curriculum for an AVID elective classroom, AVID professional development, WICOR instructional strategies, and campus implementation evaluation.	2.4, 2.5	Director, Advanced Academics./ AVID District Director Advanced Academics Specialist AP Coaches Office of School Leadership	Increase in the number of students taking Advanced courses. Increase in student performance on the STAAR assessment. Increase in the number of students meeting CCMR.				
Problem Statements: Student Academic Achievement 3, 5, 7 Funding Sources: 211 - Title I - 70000.00							
							

Performance Objective 11 Problem Statements:

Demographics
Problem Statement 3: Enrollment in the district continues to drop by about 4% each year. Root Cause 3: High mobility rates and competition from public charter schools and private schools draw away students.
Problem Statement 4: The district attendance rate is 92.9%, which is below the state average of 95.7%. Root Cause 4: Behavioral patterns of truancy and class skipping are evident at the secondary school level. Attendance rates at the early childhood centers indicate that not all parents are consistently bringing their children to school.
Student Academic Achievement
Problem Statement 3: The percentage of students in grades 3-5 who meet Approaches Grade Level standard or above on 2019 reading STAAR is 62%, and the percentage of students in grades 6-8 who meet Approaches Grade Level standard or above on reading STAAR is 59%. Root Cause 3: Ineffective Tier instruction due to lack of professional development for campus staff in teaching to the standards and implementing rigorous TEKS instruction. Ineffective ELAR interventions for Tier 3 and 2 students due to low usage, lack of fidelity to the program, and lack of monitoring.
Problem Statement 5: The Four-Year Longitudinal Graduation Rate (Graduated, Continued in School, or Received GED) is 91.9% (Class of 2018 reported in 2019) compared to the state average of ___% Root Cause 5: Tier 1 Instruction needs improvement in pedagogical implementation, content-deepening, and cultural relevance in all areas emphasizing literacy, math.
Problem Statement 7: 2018: The percent of college, career and military ready (CCMR) students is 30% with the percent of students prepared for the traditional college track below 20%. Root Cause 7: The majority of EISD students score well below the 50th percentile on PSAT/SAT and ACT assessments indicating many are not ready for college level work.







Goal 1: Student Achievement: Improve academic outcomes and prepare students to be career and college ready

Performance Objective 12: TECHNOLOGY

Increase speed of network, scalable bandwidth, resiliency, reliability, security and usability of district equipment.

Evaluation Data Source(s) 12: SonicWall Reports

Summative Evaluation 12:

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
1) Ensure the protection of student and staff computing devices		Technology Coordinator	Zero intrusions of malware				
	Funding Sources: 199 - Local - 50000.00						
2) Implement a fiber Wide Area Network infrastructure that will transport all data telecommunications and video between all EISD sites, to and from the Internet.		Technology Coordinator	Bandwidth capacity reports				
	Funding Sources: 199 - Local - 404676.00						
 = Accomplished  = Continue/Modify  = No Progress  = Discontinue							

Goal 1: Student Achievement: Improve academic outcomes and prepare students to be career and college ready


Performance Objective 13: GRADUATION and DROPOUT PREVENTION

-The Four-Year Longitudinal Graduation Rate (Graduated, Continued in School, or Received GED) will increase from 91.9% (Class of 2018 reported in 2019) to 92.0% (reported in 2019).

-To decrease the drop-out rate in grades 7-8 from 1.3% to 1.1 % in 2019-2020. -To decrease the drop-out rate in grades 9-12 from 3.5% to 3.0% in 2019-2020.

Evaluation Data Source(s) 13: Increase in graduation rate; the performance of this objective will be evaluated using district graduation reports

Summative Evaluation 13:

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
1) Complete and review Personal Graduation Plans for all 8th -12th grade students, as required by Texas Education Agency.	2.4, 2.6	Director of Counseling and Guidance	Monitor and increase graduation rate.				
	Problem Statements: Demographics 4 - Student Academic Achievement 5, 7 Funding Sources: 199 - Local - 0.00						
2) Social Workers will provide case management and counseling services to students in School Age Parent Program to ensure all supportive services are provided. Social workers will assist teen parents by connecting them to needed resources and services to remove barriers and improve academic performance.		Executive Director of Educational Operations	Increase the number of school age parents graduating from high school.				
	Funding Sources: 199 - State Compensatory PIC 30 - 120415.00						
3) Students will participate in summer school acceleration/enrichment programs to prepare them for subsequent grade levels.		Executive Director of Educational Operations, Senior Executive Director of Academic Services	Meet requirement for promotion to subsequent grade level				
	Funding Sources: 211 - Title I - 350000.00						
4) Communities in Schools will provide services to identified at-risk high school students. Services include: Counseling, Academic Enhancement, Family Involvement, Health and Social Service Referrals, Career Awareness and Enrichment Opportunities.	2.4, 2.6	Director of Guidance and Counseling	Increase Graduation Rate				
	Problem Statements: Demographics 4 - Student Academic Achievement 5 Funding Sources: 211 - Title I - 60000.00						

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June

Performance Objective 13 Problem Statements:

Demographics
<p>Problem Statement 4: The district attendance rate is 92.9%, which is below the state average of 95.7%. Root Cause 4: Behavioral patterns of truancy and class skipping are evident at the secondary school level. Attendance rates at the early childhood centers indicate that not all parents are consistently bringing their children to school.</p>


Student Academic Achievement
<p>Problem Statement 5: The Four-Year Longitudinal Graduation Rate (Graduated, Continued in School, or Received GED) is 91.9% (Class of 2018 reported in 2019) compared to the state average of ____% Root Cause 5: Tier 1 Instruction needs improvement in pedagogical implementation, content-deepening, and cultural relevance in all areas emphasizing literacy, math.</p>
<p>Problem Statement 7: 2018: The percent of college, career and military ready (CCMR) students is 30% with the percent of students prepared for the traditional college track below 20%. Root Cause 7: The majority of EISD students score well below the 50th percentile on PSAT/SAT and ACT assessments indicating many are not ready for college level work.</p>





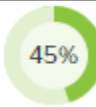
Goal 2: Organizational Learning and Leadership Development

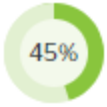




Performance Objective 1: Leadership development throughout EISD: Create leadership focused professional development tracks designed around cultivating leaders, developing professional learning networks, learning by progress monitoring, collaboration and knowledge sharing, and reflective practice.

Evaluation Data Source(s) 1: State assessments, summative assessments and feedback given to campus/district personnel.

Summative Evaluation 1:

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
1) Academic Services leadership will participate in professional learning opportunities: such as professional conferences, workshops, partner collaborations and virtual learning software, platforms and sessions and other job-embedded activities.		Academic Services Director of Teaching Director of Professional Development Office of innovation	Improved curriculum, instruction and assessment. Improved student learning outcomes.				
	Problem Statements: Student Academic Achievement 1, 3 Funding Sources: 211 - Title I - 155000.00						
2) School Improvement Coordinator/Director provides support to campus and district staff for monitoring compliance for federal and state requirements; data analysis for school improvement and preparation of reports to support planning for staff development and student interventions.		School Chiefs	state accountability indices, program implementation, compliance				
	Funding Sources: 211 - Title I - 82000.00						

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
3) Implement targeted job-embedded professional development for campus administrators and coaches to engage in relevant, tiered and effective job-embedded professional development that focus on deepening leadership capacity, culture building, instructional implementation and other relevant programmatic skills to improve teaching and learning. National Institute for Excellence in Education (NIET) provides training and leadership development for campus leaders and instructional coaches around instruction.		School leadership and Academic Services	Improved retention of personnel. Improved systems of instructional implementation. Improved student learning outcomes.				
	Problem Statements: Student Academic Achievement 1, 3 - School Processes & Programs 1 Funding Sources: 199 - Local - 3000.00, 211 - Title I - 50000.00						
4) Develop internal leadership capacity through the utilization of Leverage Leadership, Get Better Faster and modeling as methods to develop professional learning and build leadership capacity with campus administration.		Talent Management, School Leadership and Academic Services.	Improved systems of instructional implementation, teacher improvement, and student progress/increased student achievement.				
5) School Leadership will facilitate an Aspiring Principal Academy and an Aspiring Leaders Academy to create a pipeline for aspiring administrators that fosters leadership skills, building of professional learning networks, creating a culture of success, and district alignment of leadership practices.		Academic Services, School Leadership, and Talent Management	Preparation, retention and promotion of highly trained personnel.				
6) Provide access to the New Teacher Center Early Leadership Program to develop knowledge in best practices for Pre-K - 3rd grade instruction for administrators and instructional coaches ensuring that each campus has at least one trained professional to provide support in best practices for early childhood teachers on the campus.		Early Childhood Director	Increased campus level support to early childhood teachers improved Pre-K - 3 alignment improved student performance				
	Funding Sources: 199 - Local - 21000.00						
7) Implement targeted job-embedded professional development Content and Literacy Coaches. Learning opportunities focus on building leadership capacity through instructional coaching and Student Centered Coaching by Diane Sweeney.		Academic Services Content and Literacy Coordinators	Data-informed targeted and effective professional development for EISD personnel. Improved systems of instructional implementation. Improved student learning outcomes				
	Problem Statements: Student Academic Achievement 1, 3, 5						

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
8) Academic Services and content and literacy coaches will participate in multiple methods of job-embedded professional development activities such as book studies to improve effective leadership strategies (i.e: Getting Better Faster, Student-Centered Coaching, Patterns of Power).		Director of Teaching and Learning Director of Professional Development	Data-informed, targeted and effective professional development Improved curriculum, instruction and assessment.				
	Funding Sources: 255 - Title II - 5000.00, 199 - Local - 5000.00, 211 - Title I - 5000.00						
9) Implement and monitor district and private non-profit compliance with state and federal guidelines, and conduct program evaluations to inform/improve programs for effective implementation.		Director of State and Federal Programs	Compliance reports; program evaluations				
	Funding Sources: 211 - Title I - 422382.00, 199 - Local - 330642.00						
 = Accomplished  = Continue/Modify  = No Progress  = Discontinue							

Performance Objective 1 Problem Statements:




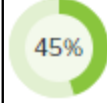
Student Academic Achievement
Problem Statement 1: 2018: Only 58% of K-3rd grade students were reading at grade level by the end of the 2018 school year. Root Cause 1: The majority of EISD students are entering first grade at a "beginning reader" level and are not ready for independent reading.
Problem Statement 3: The percentage of students in grades 3-5 who meet Approaches Grade Level standard or above on 2019 reading STAAR is 62%, and the percentage of students in grades 6-8 who meet Approaches Grade Level standard or above on reading STAAR is 59%. Root Cause 3: Ineffective Tier instruction due to lack of professional development for campus staff in teaching to the standards and implementing rigorous TEKS instruction. Ineffective ELAR interventions for Tier 3 and 2 students due to low usage, lack of fidelity to the program, and lack of monitoring.
Problem Statement 5: The Four-Year Longitudinal Graduation Rate (Graduated, Continued in School, or Received GED) is 91.9% (Class of 2018 reported in 2019) compared to the state average of ____% Root Cause 5: Tier 1 Instruction needs improvement in pedagogical implementation, content-deepening, and cultural relevance in all areas emphasizing literacy, math.
School Processes & Programs
Problem Statement 1: Kinder Readiness data indicate that only 32% of the students were performing on level. Root Cause 1: Analysis of data indicates that teachers are not effectively differentiating classroom instruction based on the results from student data.

Goal 2: Organizational Learning and Leadership Development

Performance Objective 2: The New Teacher Induction program is a comprehensive multi-tiered system of job-embedded professional development focused on deepening pedagogical practice, content knowledge, and the monitoring and adjustment of instructional implementation.

Evaluation Data Source(s) 2: Classroom walkthroughs, student artifacts, and reflections

Summative Evaluation 2:

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
1) Provide a year long New Teacher to EISD Institute, New Teacher Toupoint, which begins with a three day institute and continues with a four part learning series . Ongoing support will focus first year teachers on classroom management routines and procedures, planning, and data analysis. The induction system will include multiple layers of support for new teachers to increase retention rate		Professional Development Director, Content Coordinators, Literacy and Instructional Coaches, Talent Management, School Leadership	Eduphoria Workshop Reports New Teacher surveys				
	Problem Statements: Student Academic Achievement 5						
2) Provide a qualified mentor to newly hired teachers with 0 years of experience. New Teacher Mentoring program includes Texas Beginning Educator and Support System (TxBESS) training for the mentor and regular mentor and new teacher meetings and new teacher observations of peers.		Talent Management	Mentor Training Schedule, Mentor Support Logs, New Teacher Peer Observation Logs, end of the year surveys				
3) Provide a Head Start 101 Induction program for all staff new to the program.		Early Childhood Director	Increased compliance with program requirements, reduction in CIRs				
4) The District will engage in the Key Connector Program which connects first year teachers with a district staff member. The pair will have monthly contact and the district staff member will be another layer of mentorship outside of what the campus already provides. The more connections our new teachers have to the district we will see an increase in teacher retention.		Teaching and Learning	Increased teacher retention and satisfaction via surveys				
	Problem Statements: Student Academic Achievement 5						

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June

Performance Objective 2 Problem Statements:

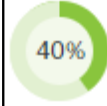
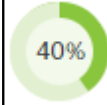
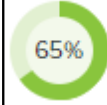
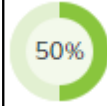
Student Academic Achievement
<p>Problem Statement 5: The Four-Year Longitudinal Graduation Rate (Graduated, Continued in School, or Received GED) is 91.9% (Class of 2018 reported in 2019) compared to the state average of ____% Root Cause 5: Tier 1 Instruction needs improvement in pedagogical implementation, content-deepening, and cultural relevance in all areas emphasizing literacy, math.</p>












Goal 2: Organizational Learning and Leadership Development






Performance Objective 3: Professional development will utilize a continuous cycle of improvement to facilitate effective and responsive job-embedded professional development activities that are aligned to district instructional initiatives to support Tier 1 instructional strategies.

Evaluation Data Source(s) 3: State assessment and summative assessments

Summative Evaluation 3:

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
1) Empowered professional learning with technology will be incorporated into job-embedded professional development activities to explore pedagogical approaches and implementation.		Digital Learning Academic Services	Improved student engagement and learning.				
	Problem Statements: Student Academic Achievement 1 Funding Sources: 199 - Local - 40000.00						
2) Virtual and blended professional development opportunities such as badging and microcredentials create personalized professional learning to improve practice and impact student achievement.		Academic Services Digital Learning	Improved student achievement results on common assessments, benchmarks, performance assessments, and STAAR				
3) Provide professional development training to nurses so they can provide quality care to all students.		Director of Student Support Services	Sign-in sheets of attendance, CPR certifications and state mandated certifications and compliance				
	Funding Sources: 199 - State Compensatory PIC 30 - 400.00						
Comprehensive Support Strategy 4) Content and literacy coaches will engage in professional development activities that meet the needs of the campus to include, classroom management, content deepening, and pedagogical implementation and student centered coaching.		Academic Services	Increased student achievement results on common assessments, benchmarks, performance assessments, and STAAR.				
	Funding Sources: 199 - State Compensatory PIC 30 - 0.00						

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
Comprehensive Support Strategy 5) Literacy and Content Coordinators, Instructional Coaches and Teachers, will collaborate on the development and refinement of curriculum, to include the alignment of supplemental materials, assessment, data analysis, Module Resource Guide to support HMH textbook adoption and curriculum review.		Academic Services	Increased student achievement results on common assessments, benchmarks, performance assessments, and STAAR.				
	Problem Statements: Student Academic Achievement 1, 3 - School Processes & Programs 1 Funding Sources: 211 - Title I - 0.00, 255 - Title II - 532961.00						
Comprehensive Support Strategy 6) Lead4ward will provide professional development training using a Trainer of Trainer model to enhance the understanding of new TEKS, ELAR standards.		Academic Services	Increased student achievement results on common assessments, benchmarks, performance assessments, and STAAR.				
	Funding Sources: 199 - State Compensatory PIC 30 - 0.00						
7) Head Start Instructional Coaches will develop Unit Resource Guides (URGs) to align resources and expectations and provide support including materials, coaching, and training to pre-K teachers.		Early Childhood Director	Improved planning, greater efficiency in planning times and consistency across Pre-K program				
8) Provide professional development to early childhood professionals and paraprofessionals to increase their knowledge of age level appropriate practices.		Early Childhood Director	Improved CLASS scores				
9) Engage in professional development aligned to Head Start standards and early childhood instructional practice.		Early Childhood Director	Improved kinder readiness Increased Head Start compliance				
10) Campus leaders, coaches and Coordinators will engage in professional development around one of our district focus areas, Quality Questioning. QQ will support our efforts to create an authentic thinking classroom. Professional Development around Quality Questioning will include the Quality Questioning text by Elizabeth Sattes.	2.4, 2.5	Teaching and Learning	Improved questions for students and from students, improved unit assessment scores and increased student responses in discussion				
	Problem Statements: Student Academic Achievement 3 Funding Sources: 199 - State Compensatory PIC 30 - 0.00						

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
<p>TEA Priorities Improve low-performing schools</p> <p>11) District Content Coordinators will provide professional development in literacy and writing utilizing the Patterns of Power writing resource. Teachers leaders will participate in the learning to support their grade level team. Professional development will encompass how to support teachers in creating the environment necessary to build strong writers in grammar and conventions then will lead them through effective delivery of each lesson.</p>	2.4, 2.5, 2.6	Director of Teaching and Learning	Increase in writing throughout the curriculum and STAAR performance.				
<p>Problem Statements: Demographics 1 - Student Academic Achievement 1 Funding Sources: 289-School Action Fund - SAF - 46320.15</p>							
<p style="text-align: center;">  = Accomplished  = Continue/Modify  = No Progress  = Discontinue </p>							

Performance Objective 3 Problem Statements:

Demographics
<p>Problem Statement 1: The district graduation rate for special education is 78.6% and the graduation rate for the state is at 90% Root Cause 1: Chronic absenteeism from our special ed students is a contributor to our district graduation rate.</p>
Student Academic Achievement
<p>Problem Statement 1: 2018: Only 58% of K-3rd grade students were reading at grade level by the end of the 2018 school year. Root Cause 1: The majority of EISD students are entering first grade at a "beginning reader" level and are not ready for independent reading.</p> <p>Problem Statement 3: The percentage of students in grades 3-5 who meet Approaches Grade Level standard or above on 2019 reading STAAR is 62%, and the percentage of students in grades 6-8 who meet Approaches Grade Level standard or above on reading STAAR is 59%. Root Cause 3: Ineffective Tier instruction due to lack of professional development for campus staff in teaching to the standards and implementing rigorous TEKS instruction. Ineffective ELAR interventions for Tier 3 and 2 students due to low usage, lack of fidelity to the program, and lack of monitoring.</p>
School Processes & Programs
<p>Problem Statement 1: Kinder Readiness data indicate that only 32% of the students were performing on level. Root Cause 1: Analysis of data indicates that teachers are not effectively differentiating classroom instruction based on the results from student data.</p>

Goal 2: Organizational Learning and Leadership Development

Performance Objective 4: HIGHLY EFFECTIVE INSTRUCTIONAL STAFF and TEACHER RETENTION

Increase the effectiveness of instructional staff and teacher retention.

- Offer and support the implementation of targeted needs-based professional development in accordance with district initiatives to 100%
- The turnover rate of teachers leaving the district will decrease from 22% to 20% by the end of school year.

Evaluation Data Source(s) 4: The performance of this objective will be measured using Eduphoria reports.

Summative Evaluation 4:

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
1) The New Teacher Induction and Mentor system as a multi-tiered comprehensive system for the retention of new teachers.		Director of Teaching and Learning Talent Management	Retention of new teachers				
2) Aligned job-embedded responsive professional development activities will utilize an Adult-Learning cycle of improvement to engage teachers in deepening of content and pedagogy.		Director of Teaching and Learning Talent Management	Retention of teachers				
3) Utilize the CLASS observation system to assess Pre-Kinder classrooms.		Early Childhood Director	Improved relationships and academic performance				
= Accomplished = Continue/Modify = No Progress = Discontinue							

Goal 2: Organizational Learning and Leadership Development

Performance Objective 5: Capture more under insured and uninsured students in need of physician evaluation for vision, hearing and dental services.

Evaluation Data Source(s) 5: Performance objective evaluated at end of school year using Title 1 funds.

Summative Evaluation 5:


Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
1) Complete state mandated screenings and identify students needing vision and hearing, dental evaluations. Refer to appropriate health care provider and/or dentist for treatment.		Director of Student Support Services	Increase the number of under insured and uninsured students from 15% to 25% by using Title 1 funding for students.				
	Funding Sources: 199 - Local - 500.00						
2) Connect all Head Start students with a medical home through monthly contact by Family Service Workers. Provide opportunities for participation in wrap around services that support health needs.		Early Childhood Director	100% compliance with program guidelines.				
= Accomplished = Continue/Modify = No Progress = Discontinue							

Goal 2: Organizational Learning and Leadership Development

Performance Objective 6: Increase the number of students in great schools by receiving customized planning support to school districts committed to bold and aggressive action to transform low-performing schools and create better options for students.

Evaluation Data Source(s) 6: Goals and objectives from the School Transformation Fund Grant

Summative Evaluation 6:

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
1) 1) Receive technical support to discuss the status of the pre-k partnership agreement and financial model.		Chief Innovation Officer, School Principal	100% compliance with program guidelines.				
Funding Sources: 211 - School Transformation Fund - STF - 75000.00							
							

Goal 3: Exceptional Learners: To improve instructional programs to meet the needs of all exceptional learners.









Performance Objective 1: SPECIAL EDUCATION

Increase the number of Special Education students meeting Approaches Grade Level performance in grades 3 - 8 (PBMAS Indicators) by the end of the school year 2020.

- Increase the number of Special Education students meeting Approaches Grade Level performance in Reading STAAR (3-5) from 17% to 70%, Meets standard will increase to 40% and Masters standard will increase to 10% by the end of the school year 2020 (PBMAS indicator).
- Increase the number of Special Education students meeting Approaches Grade Level performance in Math STAAR (3-5) from 18 to 70%, Meets standard will increase to 40% and Masters standard will increase to 10% by the end of the school year 2020 (PBMAS indicator).
- Increase the number of Special Education students meeting Approaches Grade Level performance in 4th grade Writing STAAR from 4% to 70%, Meets standard will increase to 40% and Masters standard will increase to 10% by the end of the school year 2020 (PBMAS Indicator).
- Increase Special Education students meeting Approaches Grade Level performance in 7th grade Writing STAAR from 5% to 70%, Meets standard will increase to 40% and Masters standard will increase to 10% by the end of the school year 2020 (PBMAS Indicator).
- Increase Special Education students meeting Approaches Grade Level performance in Science STAAR 5th grade from 16% to 70%, Meets standard will increase to 40% and Masters Standard will increase to 10% by the end of the school year 2020.
- Increase Special Education student meeting Approaches Grade Level performance in Algebra I EOC from 39% to 70%, Meets standard will increase to 40% and Masters standard will increase to 10% by the end of the school year 2020 (PBMAS Indicator).
- Increase the number of Special Education students meeting Approaches Grade Level performance in Math STAAR (6-7) from 12% to 70%, Meets standard will increase to 40% and Masters standard will increase to 10% by the end of the school year 2020 (PBMAS indicator).
- Increase Special Education student meeting Approaches Grade Level performance in Science STAAR (8th) from 16% to 70%, Meets standard will increase to 40% and Masters Standard will increase to 10% by the end of the school year 2020.
- Increase Special Education students meeting Approaches Grade Level performance in Social Studies STAAR (8th) from 8% to 70%, Meets standard will increase to 40% and Masters Standard will increase to 10% by the end of the school year 2020.
- Increase Special Education students meeting Approaches Grade Level performance in EOC ELA I from 15% to 70%, Meets standard will increase to 40% and Masters standard will increase to 10% by the end of the school year 2020 (PBMAS Indicator).
- Increase Special Education students meeting Approaches Grade Level performance in EOC ELA II from 9% to 70% ,Meets standard will increase to 40% and Masters standard will increase to 10% by the end of the school year 2020 (PBMAS Indicator).
- Increase Special Education students meeting Approaches Grade Level performance in Biology from 38% to 70%, Meets standard will increase to 40% and Masters Standard will increase to 10% by the end of the school year 2020.
- Increase Special Education students meeting Approaches Grade Level performance in EOC US History from 53% to 70%, Meets standard will increase to 40% and Masters Standard will increase to 10% by the end of the school year 2020.

Evaluation Data Source(s) 1: This objective will be evaluated using 2019-2020 PBMAS results and 2019-2020 STAAR results.

Summative Evaluation 1:

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
1) Students will participate in continuum of services that will be monitored by campus administration to assure individual student needs.		Special Education Compliance and Instructional Coordinator	Increased student achievement results on CBA, benchmarks, STAAR and appropriate program assessments.				
2) Teachers will participate in training to understand the Least Restrictive Environment Requirement and A Continuum of Alternative Placements process when considering a student with disability that may benefit from an educational placement.		Special Education Instructional Coordinator	Increase student achievement results on achievement results on CBS's , Benchmarks, STAAR and appropriate program assessments.				
3) Students will participate in co-teach classrooms in the areas of ELAR and Math at the secondary level using differentiated instructional strategies and accommodations provided in the general education classroom.	2.4, 2.5, 2.6	Special Education Specialist	Increased student achievement results on CBA's, benchmarks, STAAR and appropriate program assessments.				
Problem Statements: Demographics 1							
4) Special Education teachers will participate in training's to receive Differentiated Instructional approaches and strategies.		Special Education Instructional Coordinator	Increase student achievement results on achievement results on CBS's , Benchmarks, STAAR and appropriate program assessments.				
5) Students will attend the Regional Day School for the Deaf as indicated on their Admission, Review and Dismissal (ARD).		Special Education Director	Increased student achievement results on CBA's, benchmarks, STAAR and appropriate program assessments.				
Funding Sources: 199-Special Education PIC 23 - 54000.00							
6) Preschool Program for Children with Disabilities (PPCD) students will engage in direct instruction and support in preparation for school structure and transition to elementary campuses.	2.5, 2.6	Special Education Director	Individual IEP Progress report, CIRCLE and LAP 3 scores				
7) Special education PPCD teachers will participate in PPCD Transition training to review steps and preparedness for students transition to the elementary.		Special Education Specialist (PPCD)					
8) Students will receive related services as identified by the Admission Review Dismissal Committee (ARDC); services such as: speech therapy, and physical therapy, deaf interpreters, language interpretation, music therapy and psychological assessment.	2.4, 2.5, 2.6	Special Education Director	Increased student performance on CBA, benchmarks, STAAR, and appropriate program assessments.				
Funding Sources: 199-Special Education PIC 23 - 519236.00							

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
9) Students will participate in guided reading and prescriptive instruction in resource classrooms, that incorporates both formal and informal reading assessments.	2.4, 2.5, 2.6	Special Education Instructional Coordinator	Increased student achievement results on CBA's, benchmarks, STAAR and appropriate program assessments.				
10) Special education teachers will use an electronic web-based program to document students with disabilities on their Admission, Review and Dismissal (ARD).		Special Education Director	ARD compliance reports				
Funding Sources: 224 - Title I - SPED PIC 23 - 32000.00							
11) Special Education Staff will receive training's to on esped an electronic web-based program to document students with disabilities on their Admission, Review and Dismissal (ARD).		Special Education Specialist (Technology)					
12) Students will engage in differentiated instruction that addresses individual student needs as specified in their Individualized Education Plans (IEPs).		Special Education Instructional Coordinator	Increased student achievement based on IEP report card				
13) Special education department staff members and teachers will participate in professional development sessions to include research based instructional practices and strategies, accommodations, and modifications that address the academic, functional, and behavioral needs of students with disabilities.	2.4, 2.6	Special Education Director	Increased student achievement among students who participate in Special Education				
Problem Statements: Demographics 1 - Student Academic Achievement 3 Funding Sources: 199-Special Education PIC 23 - 19280.00, 224 - Title I - SPED PIC 23 - 18500.00							
14) Special education teachers will provide consultation and support to general education teachers in the instruction of students with disabilities.		Special Education Specialists	Increased student achievement results on CBA's, benchmarks, STAAR and appropriate program assessments.				
15) Provide professional development opportunities for paraprofessionals who work with students having academic and/or behavioral difficulties.		Special Ed Coordinator	Increased student achievement results on CBA's, benchmarks, STAAR and appropriate program assessments.				
16) Special Education Paraprofessionals will participate in Crisis Prevention Intervention (Deescalation-(Behavior strategies)and Literacy training to focus on Vocabulary development to support students		Special Ed Coordinator	Increase student achievement results on CBA's, benchmarks, STAAR and appropriate program assessments.				
17) Students from the Edgewood 18+ and students in Life Skills participating in Community Based Instruction (CBI) will receive district and city bus transportation services.	2.5, 2.6	Special Education Director	Increased student achievement as a result of student participation in programs.				
Funding Sources: 199 - State Compensatory PIC 30 - 1300.00, 224 - Title I - SPED PIC 23 - 1000.00							

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
18) Special Education teachers will participate in professional development and Co-Teach sessions to increase academics and decrease performance gaps.		Special Education Coordinator	Increase student achievement results on CBA's, Benchmarks, STAAR and appropriate program assessments.				
Funding Sources: 199-Special Education PIC 23 - 30000.00							
TEA Priorities Connect high school to career and college 19) Enhance 18+ student learning experiences through up-to-date furniture and equipment that will prepare students for career and industry based employment opportunities.	2.4, 2.5	18+ Special Education Specialist	Increase student learning and employment opportunities.				
Funding Sources: 224 - Title I - SPED PIC 23 - 8672.00							
= Accomplished = Continue/Modify = No Progress = Discontinue							

Performance Objective 1 Problem Statements:

Demographics
Problem Statement 1: The district graduation rate for special education is 78.6% and the graduation rate for the state is at 90% Root Cause 1: Chronic absenteeism from our special ed students is a contributor to our district graduation rate.
Student Academic Achievement
Problem Statement 3: The percentage of students in grades 3-5 who meet Approaches Grade Level standard or above on 2019 reading STAAR is 62%, and the percentage of students in grades 6-8 who meet Approaches Grade Level standard or above on reading STAAR is 59%. Root Cause 3: Ineffective Tier instruction due to lack of professional development for campus staff in teaching to the standards and implementing rigorous TEKS instruction. Ineffective ELAR interventions for Tier 3 and 2 students due to low usage, lack of fidelity to the program, and lack of monitoring.

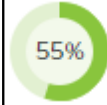
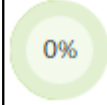


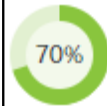
Goal 3: Exceptional Learners: To improve instructional programs to meet the needs of all exceptional learners.




Performance Objective 2: ENGLISH LEARNERS (Students who are in the process of acquiring English and have another language as the primary language)

- Increase the percentage of English learners (EL) meeting or exceeding progress on Reading and Math STAAR from 36% to 55% by the end of the school year 2020.
- Increase English learners meeting Approaches Grade Level performance in Reading STAAR (3-5) from 59% to 70%, Meets standard will increase to 40% and Masters standard will increase to 10% by the end of school year 2020.
- Increase the number of English learners meeting Approaches Grade Level performance in Math STAAR (3-5) from 66% to 74% by the end of the school year 2020 (PBMAS indicator).
- Increase English learners meeting Approaches Grade Level performance in Writing STAAR (4th) from 54% to 70%, Meets standard will increase to 40% and Masters standard will increase to 10% by the end of school year 2020.
- Increase the number of English learners meeting Approaches Grade Level performance in Math STAAR (6-8) from 59% to 65% by the end of the school year 2020 (PBMAS indicator).
- Increase English learners meeting Approaches Grade Level performance in Social Studies STAAR (8th) from 31% to 70%, Meets standard will increase to 40% and Masters standard will increase to 10% by the end of school year 2020.
- Increase English learners meeting Approaches Grade Level performance in Science STAAR (5th) from 50% to 70%, Meets standard will increase to 40% and Masters standard will increase to 10% by the end of school year 2020.
- Increase English learners meeting Approaches Grade Level performance in Reading STAAR (6-8) from 59% to 70%, Meets standard will increase to 40% and Masters standard will increase to 10% by the end of school year 2020.
- Increase English learners meeting Approaches Grade Level performance in EOC Algebra I (8-12) from 72% to 70%, Meets standard will increase to 40% and Masters standard will increase to 10% by the end of school year 2020.
- Increase English learners meeting Approaches Grade Level performance in Writing STAAR (7th) from 38% to 70%, Meets standard will increase to 40% and Masters standard will increase to 10% by the end of school year 2020.
- Increase English learners meeting Approaches Grade Level performance in Science STAAR (8th) from 41% to 70%, Meets standard will increase to 40% and Masters standard will increase to 10% by the end of school year 2020.
- Increase English learners meeting Approaches Grade Level performance in EOC (9-12) ELA I 39% to 70%, Meets standard will increase to 40% and Masters standard will increase to 10% by the end of school year 2020.
- Increase English learners meeting Approaches Grade Level performance in EOC (9-12) ELA II from 27% to 70%, Meets standard will increase to 40% and Masters standard will increase to 10% by the end of school year 2020.
- Increase English learners meeting Approaches Grade Level performance in EOC (9-12) Biology from 68% to 65% by the end of the school year 2020 (PBMAS Indicator).
- Increase English learners meeting Approaches Grade Level performance in EOC (9-12) US History from 76% to 82% by the end of the school year 2020 (PBMAS Indicator).
- Decrease TELPAS beginning and intermediate Composite Rating levels for students in U.S. schools multiple years from 13.2% to 12% (PBMAS Indicator).

Evaluation Data Source(s) 2: The performance of this objective will be measured using STAAR, TELPAS and PBMAS data.

Summative Evaluation 2:

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
1) Place English Learners (EL) in dual language immersion and/or ESL classes. ELs participating in these programs will receive English language development and sheltered instruction. These will assist in the process of making content comprehensible, develop academic language, increase student achievement and English language proficiency.		Bilingual/ESL Specialist, BESL Director, Campus LPAC Administrators	Identified English learners are placed in the appropriate program				
	Problem Statements: Demographics 2 Funding Sources: 199-Bilingual PIC 25 - 504100.00, 263 - Title III Part A - LEP - 0.00						
2) Provide coaching to teachers of English learners with second language acquisition strategies (English and/or Spanish depending on the program) in order to effectively address the content TEKS and English Language Proficiency Standards (ELPS) in critical areas such as writing and Social Studies to differentiate and meet the needs of English Learners based on the language of instruction/language framework.		Bilingual/ESL Specialist, Bilingual/ ESL Coach	Increased student achievement results on CBA's, benchmarks, STAAR, and TELPAS				
	Problem Statements: Demographics 2 Funding Sources: 263 - Title III Part A - LEP - 70000.00						
3) Instructional Content Coaches will receive training on second language acquisition strategies to effectively support teachers servicing English learners.		Bilingual/ESL Director	Increased student achievement results on CBA's, benchmarks, STAAR, Eduphoria reports and appropriate program assessments.				
	Problem Statements: Demographics 2 Funding Sources: 199-Bilingual PIC 25 - 43000.00						
4) Address the linguistic needs of English Learners as identified and documented by the Language Proficiency Assessment Committee (LPAC). Documentation such as the identification test results and LPAC recommendations will be centralized through the use of the ELLevation platform.		Bilingual/ESL Director and Campus LPAC Administrators	Increased student performance on STAAR and English language proficiency growth on TELPAS				
	Problem Statements: Demographics 2 Funding Sources: 199-Bilingual PIC 25 - 43000.00						

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
5) Train teachers in effective second language acquisition strategies to address the needs of English Learners. These include areas such as questioning, integrating language skills (reading, writing, listening and speaking), use of cognates, building academic language, visual and technology tools, response signals, structured conversations, structured reading and writing activities, and others. Make connections with new SLAR/ELAR TEKS at the elementary and middle school levels that will be implemented 2019-2020.		Bilingual/ESL Specialist	Increased student achievement results on CBA's, benchmarks, STAAR, TELPAS and appropriate program assessments.				
	Problem Statements: Demographics 2 Funding Sources: 199-Bilingual PIC 25 - 14100.00, 263 - Title III Part A - LEP - 7000.00						
6) Provide dual language immersion teachers and bilingual paraprofessionals with training opportunities to promote a Balanced Literacy Approach in a bilingual setting for English learners and English proficient students participating in the dual language immersion program. in conjunction with the use of the new adopted SLAR/ELAR materials.		Multilingual Services Director , Literacy Coordinator, & Multilingual Coaches	Increased student achievement results on CBA's, benchmarks, STAAR, Eduphoria reports, Istation data and other appropriate program assessments.				
	Problem Statements: Demographics 2 - Student Academic Achievement 1 Funding Sources: 199-Bilingual PIC 25 - 0.00						
7) Provide a summer bilingual program for Prek 4 and Kinder English Learners (ELs) to develop and enhance bi-literacy skills to prepare them for subsequent grade levels.		Multilingual Services - Director	Increase student achievement using CIRCLE, Istation data and Oral Language Proficiency data.				
	Problem Statements: Student Academic Achievement 1 Funding Sources: 199-Bilingual PIC 25 - 54000.00						
8) Implement the English Language Proficiency Standards (ELPS) with an emphasis on promoting student's English language development aligned to the language proficiency levels of English learners. This will serve in the foundation of the English language necessary to support content learning.			Increased student English language proficiency on TELPAS				
	Problem Statements: Demographics 2 - Student Academic Achievement 1 Funding Sources: 263 - Title III Part A - LEP - 0.00						
9) Analyze TELPAS language proficiency data to assess the student's language growth in order to differentiate instruction and identify students that potentially can meet reclassification criteria which will result in reducing the number of long-term ELs and parent denials.		Multilingual Services	Increased student language proficiency level (TELPAS) and appropriate curriculum assessments. Decreased number of long term ELs.				
	Problem Statements: Demographics 2 - Student Academic Achievement 1 Funding Sources: 199-Bilingual PIC 25 - 0.00						

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
10) Implement activities and instructional approaches aimed at fostering language growth specific to the speaking domain of TELPAS. English learners should have opportunities to engage in meaningful and constructive conversations, oral presentations and utilization of technology such as flip grid, see saw, chatter pix, puppet edu and others to record, share and showcase their oral skills in English.		Multilingual Services	Increased student language proficiency level (TELPAS) and appropriate curriculum assessments.				
11) Build teacher capacity in the areas of instructional environment, instructional delivery and content knowledge by building collaborative relationships between Bilingual/ESL, Academics and Special Programs to support also the needs of newcomers.		Multilingual Services	Increased student achievement results on CBA's, benchmarks, STAAR, Eduphoria reports and appropriate program assessments.				
Problem Statements: Demographics 2 - Student Academic Achievement 1 Funding Sources: 199-Bilingual PIC 25 - 4200.00							
12) Provide training to address components of the adopted new SLAR/ELAR materials based on Balanced Literacy to promote and develop word study, phonics, phonemic awareness, grammar, fluency and other skills. through read aloud, guided reading, independent reading and mentor texts to connect with Unit Resource Guides.		Bilingual/ESL Specialist and Literacy Coordinator	Increased student achievement results on CBA's, benchmarks, STAAR, Eduphoria reports and appropriate program assessments.				
Problem Statements: Student Academic Achievement 1, 3 Funding Sources: 199-Bilingual PIC 25 - 5000.00							
13) Use of social media and SMORE to communicate with teachers, parents and community members highlighting the linguistic, academic and cultural advantages of participating in the programs offered for English learners.		Multilingual Services Director, Coaches & specialist	Increased Twitter usage and communication with teachers, parents and community about the dual language program and services.				
Problem Statements: Demographics 3 - Student Academic Achievement 3							
14) Provide parents with informational resources and meetings about the benefits of bilingual/ESL education, program models, and second language acquisition stages.		Multilingual Services	Increased understanding and knowledge on bilingual/ESL program models.				
Funding Sources: 263 - Title III Part A - LEP - 0.00							
= Accomplished = Continue/Modify = No Progress = Discontinue							

Performance Objective 2 Problem Statements:

Demographics

Problem Statement 2: End-of-Course STAAR performance is an area of need for English Learners with pass rates 3% (Algebra I) to 21% (English II) lower than all students. **Root Cause 2:** The rate of English language proficiency development is not keeping pace with the level of academic rigor expected at the high school level.

Problem Statement 3: Enrollment in the district continues to drop by about 4% each year. **Root Cause 3:** High mobility rates and competition from public charter schools and private schools draw away students.

Student Academic Achievement

Problem Statement 1: 2018: Only 58% of K-3rd grade students were reading at grade level by the end of the 2018 school year. **Root Cause 1:** The majority of EISD students are entering first grade at a "beginning reader" level and are not ready for independent reading.



Problem Statement 3: The percentage of students in grades 3-5 who meet Approaches Grade Level standard or above on 2019 reading STAAR is 62%, and the percentage of students in grades 6-8 who meet Approaches Grade Level standard or above on reading STAAR is 59%. **Root Cause 3:** Ineffective Tier instruction due to lack of professional development for campus staff in teaching to the standards and implementing rigorous TEKS instruction. Ineffective ELAR interventions for Tier 3 and 2 students due to low usage, lack of fidelity to the program, and lack of monitoring.







Goal 3: Exceptional Learners: To improve instructional programs to meet the needs of all exceptional learners.

Performance Objective 3: The district will ensure all eligible migrant families are properly identified, recruited, and served in order to provide the supplemental services needed to guarantee student success in school.

Evaluation Data Source(s) 3: 90% of Migrant Surveys returned by parents/caregivers. Number of students identified as Migrant through paper/online enrollment.

Summative Evaluation 3:

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
<p>Equity Plan Strategy TEA Priorities Build a foundation of reading and math 1) Attend Identification & Recruitment (ID&R) Training offered by ESC- Recruiters. Attend ID&R and New Generation System (NGS) training offered by ESC-Designated SEA Reviewers. Certificate of Eligibility (COEs) for new school year cannot be completed until training has occurred or as determined by TEA.</p>	2.4, 2.6	Director of Multilingual Services & Migrant Specialist	Participation/completion certificate				
<p>Equity Plan Strategy TEA Priorities Build a foundation of reading and math Connect high school to career and college 2) Migrant Specialist will conduct activities year-round for ongoing recruitment efforts. The focus will be on Early Childhood and Out of School Youth. Will also coordinate other state and federal agencies that serve migrant families.</p>	2.4, 2.6	Director of Multilingual Services & Migrant Specialist	Increased identification of migrant students; recruiter meeting agendas				
<p>Equity Plan Strategy TEA Priorities Build a foundation of reading and math 3) Contact families of currently eligible migrant students to determine if new qualifying moves have occurred. Complete COEs as needed and share copies with appropriate entities as listed on COEs.</p>	2.4, 2.6	Director of Multilingual Services & Migrant Specialist	Recruiter logs, completed COEs and documentation of contact attempts, Unique Student Count Report				





Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
Equity Plan Strategy 4) Review of COEs. Designated SEA Reviewer reviews COE and accompanying Supplemental Documentation Form (SDF) for all families with a new QADs. Return COE and COE SDF to recruiter if additional information is needed. Submit to NGS Terminal Site after eligibility review is completed. NGS Specialist is to enter data into NGS per the timeline. The Specialists will input coding into PEIMs (only after a child is encoded on NGS) and copy will be provided to the Migrant parent.		Director of Multilingual Services & Migrant Specialist	All children enrolled into NGS have been properly verified.				
Equity Plan Strategy TEA Priorities Build a foundation of reading and math 5) Conduct Residency Verification. Verify continued residency for all currently eligible children who have not made a new qualifying move (QAD) during the current reporting period.		Director of Multilingual Services & Migrant Specialist	Recruiters logs, Residency Verification Report				
<div style="display: flex; justify-content: space-around; align-items: center;"> <div style="text-align: center;">  = Accomplished </div> <div style="text-align: center;">  = Continue/Modify </div> <div style="text-align: center;">  = No Progress </div> <div style="text-align: center;">  = Discontinue </div> </div>							

Goal 3: Exceptional Learners: To improve instructional programs to meet the needs of all exceptional learners.

Performance Objective 4: Migrant students reaching the scale score level in reading STAAR will increase by 3% and math STAAR will increase by 5% by the year 2020.

Evaluation Data Source(s) 4: The performance of this objective will be measured using STAAR, TELPAS, and PBMAS data.

Summative Evaluation 4:

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
<p>Equity Plan Strategy TEA Priorities Build a foundation of reading and math 1) During the academic calendar, the Title I, Part C Migrant staff will provide campus principals and appropriate campus staff information on the Priority for Service criteria and updated NGS Priority for Service reports.</p>	2.4, 2.6	Director of Multilingual Services & Migrant Specialist	Provide support services				
<p>Equity Plan Strategy TEA Priorities Build a foundation of reading and math 2) During academic calendar, the Title I, Part C Migrant staff will make individualized home and/or community visits to update parents on the academic progress of their children.</p>	2.4, 2.6	Director of Multilingual Services & Migrant Specialist	Parent evaluations/feedback, counselor follow-up, phone logs, email documentation and mail out list				
<p>Equity Plan Strategy TEA Priorities Build a foundation of reading and math 3) The district's Title I, Part C Migrant staff will ensure that PFS students receive priority access to instructional services as well as social workers and community social services/agencies.</p>	2.4, 2.6	Director of Multilingual Services & Migrant Specialist	Recruiter logs, Tutor logs, Counselor's Response Multi-tiered System supports to Intervention/logs				
<p style="text-align: center;">  = Accomplished  = Continue/Modify  = No Progress  = Discontinue </p>							

Goal 3: Exceptional Learners: To improve instructional programs to meet the needs of all exceptional learners.





Performance Objective 5: GIFTED and TALENTED

Increase advanced Level III student performance with Gifted and Talented students in 6th through 8th grade Reading from 37% to 50%.

Evaluation Data Source(s) 5: Masters STAAR performance

Summative Evaluation 5:

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
1) Create and Implement a comprehensive GT instructional system aligned to the TX GT State plan. The service delivery model will focus on referral and assessment, GT curriculum and instruction, job-embedded professional development, parent engagement, and program evaluation. focused on higher level instructional strategies for Gifted and Talented students.		Director of Advanced Academics Advanced Academics specialist	Increase equity and diversity in the GT population to reflect district demographics. Increase the number of GT students who perform at the masters level in STAAR. number of teachers who meet GT professional development requirements for the initial 30 hours or the 6 hour annual update.				
	Problem Statements: Student Academic Achievement 3 Funding Sources: 199 - Gifted & Talented PIC 21 - 99365.00						
2) Create a comprehensive student referral system for assessment and identification into the GT program. Strategies such as universal screening, implementation of local norms, evaluation of current assessments, and implementation of new assessments.		Director, Advanced Academics Advanced Academic Specialist GT Coaches	Increase in the number of students referred and identified for GT services.				
	Funding Sources: 199 - Gifted & Talented PIC 21 - 8000.00, 199-High School Allotment PIC 31 - 30000.00						

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
3) Involve all stakeholders in the GT instructional system by providing GT informational sessions to parents and community to include strategies such as GT parent advisory committee, parent GT service surveys, GT family nights etc.		Director, Advanced Academics	Increase parent awareness of the GT program.				
		Advanced Academic Specialist	Increase in the number of students referred to the GT program.				
GT Coaches Campuses Funding Sources: 199 - Gifted & Talented PIC 21 - 4000.00							
4) The GT Professional Learning System utilizes a continuous cycle of improvement to facilitate effective and responsive organizational job-embedded professional development activities that are aligned to the goals of the TX GT State Plan - Strategies such as GT Coaches, Region XX GT Cooperative, TAGT On-line GT learning sessions, GT conferences, AP Summer Institute, AVID institute provide learning opportunities that promotes, nature and needs, depth and complexity, referral and assessment, and SEL.		Director of Advanced Academics	All teachers especially GT Cluster teachers and Secondary GT Teacher will have the required initial 30 GT hours and annual 6 hour updates				
		Advanced Academics Specialist	Administrators and Counselors will have the required 6 hour mandate				
GT Coaches Increase in number of GT students who perform at the Masters level on the STAAR exams. Increase the number of GT Students meeting CCMR requirements.							
Problem Statements: Student Academic Achievement 3, 7							
5) GT curriculum and instruction - Students engage in accelerated differentiated learning focused on increasing general intellect. Instructional Opportunities such as , Acceleration pathways, AP courses, Dual Credit, Dual Enrollment, TSPS, Project Presentations, GT Showcase			Increase in number of GT students who meet CCMR .				
			Increase the number of GT students who meet college readiness benchmarks on the SAT Suite of Assessments				
Increase the number of GT students who meet masters on the STAAR assessment.							
Problem Statements: Student Academic Achievement 3, 7							
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Performance Objective 5 Problem Statements:

Student Academic Achievement

Problem Statement 3: The percentage of students in grades 3-5 who meet Approaches Grade Level standard or above on 2019 reading STAAR is 62%, and the percentage of students in grades 6-8 who meet Approaches Grade Level standard or above on reading STAAR is 59%. **Root Cause 3:** Ineffective Tier instruction due to lack of professional development for campus staff in teaching to the standards and implementing rigorous TEKS instruction. Ineffective ELAR interventions for Tier 3 and 2 students due to low usage, lack of fidelity to the program, and lack of monitoring.

Problem Statement 7: 2018: The percent of college, career and military ready (CCMR) students is 30% with the percent of students prepared for the traditional college track below 20%.

Root Cause 7: The majority of EISD students score well below the 50th percentile on PSAT/SAT and ACT assessments indicating many are not ready for college level work.

Goal 3: Exceptional Learners: To improve instructional programs to meet the needs of all exceptional learners.

Performance Objective 6: 504 / Dyslexia

To meet the needs of our dyslexia population with identification, instruction and program monitoring

Evaluation Data Source(s) 6: Program self evaluation based on number of referrals, parent survey and membership

Summative Evaluation 6:

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
Comprehensive Support Strategy Additional Targeted Support Strategy 1) Students will implement the use of reading strategies and learning accommodations learned in the Dyslexia Intervention Program.		Dyslexia and 504 Specialist	Increased students achievement in state, district, and local assessments as measured by the goals above.				
Comprehensive Support Strategy Additional Targeted Support Strategy 2) Provide staff development for Dyslexia teachers to identify and service students in the Dyslexia Program.		Dyslexia/504 Specialist	Increased student performance in state, district, and local assessments.				
Funding Sources: 199 - Local - 3000.00							

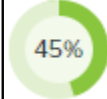

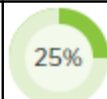
Goal 4: Student Support Services: To provide a well-rounded education to increase student achievement.

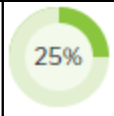
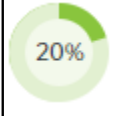
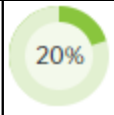
Performance Objective 1:








Provide a proactive developmental guidance program that addresses responsive services that support social and emotional well-being of students.

Evaluation Data Source(s) 1: Increase social emotional learning and academic achievement

Summative Evaluation 1:

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
1) Students will participate in a Human Sexuality Education Program related to sexually transmitted diseases, human immunodeficiency virus, and abstinence as preferred choice of behavior in relationship to all sexual activity.	2.4, 2.6	Director of Student Support Services	Increase four year graduation rate and reduce dropout rate				
	Problem Statements: Student Academic Achievement 5 Funding Sources: 206 - TEXSHEP Grant - 500.00						
2) Identify homeless students for the McKinney-Vento Program and coordinate supportive services to ensure that homeless students are present at school.	2.4, 2.6	Director of Student Support Services	Increased attendance rate for homeless student population				
	Problem Statements: Demographics 4, 5 - Student Academic Achievement 5 Funding Sources: 206 - TEXSHEP Grant - 3000.00						
3) Provide a variety of research-based and effective behavioral practices that help with positive classroom management reinforcement to assist with increased student achievement. Job-embedded professional learning includes small group training, and instructional rounds for push-in support and monitoring of implementation. Support focuses on the development of positive behavioral support systems to positively impact both the classroom environment and student achievement.		Hearing and Truancy Officer	Sign-in Sheets from training, Survey feedback and discipline data. Discipline Committee Minutes Feedback from instructional round regarding behavioral supports.				
	Funding Sources: 255 - Title II - 0.00						

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
4) Childsafe will provide state required training on child and sex abuse reporting policies to all staff members	2.4, 2.6	Director of Guidance and Counseling Services	Childsafe reports				
	Problem Statements: Demographics 4 - Student Academic Achievement 5 Funding Sources: 199 - Local - 5000.00						
5) Counselors and Social Workers will provide training on policy and procedures to students, staff and parents. Topics to include: - Bullying - Character Education - Child Abuse Prevention - College, Career and Military Readiness (CCMR) - Dating Violence - Human Sexuality - LGBTQ - Mental Health - Social Emotional Learning - Suicide Prevention	2.4, 2.6, 3.2	Director of Guidance and Counseling and Director of Student Support Services	Increase academic success, reduce drop out, decrease in discipline and counseling referrals.				
	Problem Statements: Demographics 3, 4 - Student Academic Achievement 5, 7 Funding Sources: 199 - Local - 0.00						
6) Provide evidence based program that will provide social and emotional support to increase student achievement and ensure a well-rounded education.	2.4, 2.6	Director of Guidance and Counseling and Director of Student Support Services	Data will assist us in identifying student behavior and strategies will show decrease in discipline referrals.				
	Funding Sources: 289 -Title IV Part A - Student Support and Academy - 48000.00						
7) Counselors and Social Workers will create Breakfast and Lunch Bunch groups as needed to provide counseling services.	2.4, 2.6	Director of Guidance and Counseling and Director of Student Support Services	Decrease in discipline referrals and increase in attendance.				
	Problem Statements: Demographics 4 - Student Academic Achievement 5 Funding Sources: 199 - Local - 500.00						

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
8) Counselors and Social Workers will provide guidance lessons, counseling services and resources to students that experience mental health issues. Training may be provided to school faculty and staff on mental health warning signs: i.e. Trauma-Sensitive Schools Training, Youth Mental Health First Aid, etc.	2.4, 2.6	Director of Guidance and Counseling and Director of Student Support Services	Improved Student Behavior and Academic Success				
	Problem Statements: Demographics 4 - Student Academic Achievement 5 Funding Sources: 289 -Title IV Part A - Student Support and Academy - 13000.00						
9) Counselors will provide guidance lessons on character education and conflict resolution. There will be one character trait that they will focus on each month.	2.4, 2.6	Director of Guidance and Counseling	Decrease in discipline referrals				
	Problem Statements: Demographics 4 - Student Academic Achievement 5, 7						
10) Provide a comprehensive developmental guidance and counseling program in a systematic way to all students Pre K-12, - Guidance Curriculum - Individual Planning - Responsive Services - System Support	2.4, 2.6	Director of Guidance and Counseling	Increase graduation rates, reduce discipline referrals, improved Student Behavior and Academic Success				
	Problem Statements: Demographics 4 - Student Academic Achievement 5, 7						
11) Increase Professional Development opportunities for counselors and social workers: Region 20 Counseling Cooperative, Texas Association of School Counselor Conference, CollegeBoard Counselor Updates, etc.	2.6	Director of Guidance and Counseling	Increase knowledge of counselors and social workers to provide support for students and increase employee retention.				
	Problem Statements: Student Academic Achievement 5, 7						
12) Provide training and materials for implementation of Conscious Discipline to address Social Emotional needs of Pre-kindergarten students.		Early Childhood Director	Improved response and intervention to social emotional problems at an early age to help improve students' kinder readiness				
	Problem Statements: Student Academic Achievement 5, 7						
 = Accomplished  = Continue/Modify  = No Progress  = Discontinue							

Performance Objective 1 Problem Statements:

Demographics

Problem Statement 3: Enrollment in the district continues to drop by about 4% each year. **Root Cause 3:** High mobility rates and competition from public charter schools and private schools draw away students.

Problem Statement 4: The district attendance rate is 92.9%, which is below the state average of 95.7%. **Root Cause 4:** Behavioral patterns of truancy and class skipping are evident at the secondary school level. Attendance rates at the early childhood centers indicate that not all parents are consistently bringing their children to school.

Problem Statement 5: Homeless students have a 2.8% lower attendance rate lower attendance rate than the general student population attendance rate.. **Root Cause 5:** Socio-economic challenges associated with poverty and home stability serve as obstacles to regular school attendance.

Student Academic Achievement

Problem Statement 5: The Four-Year Longitudinal Graduation Rate (Graduated, Continued in School, or Received GED) is 91.9% (Class of 2018 reported in 2019) compared to the state average of ____% **Root Cause 5:** Tier 1 Instruction needs improvement in pedagogical implementation, content-deepening, and cultural relevance in all areas emphasizing literacy, math.

Problem Statement 7: 2018: The percent of college, career and military ready (CCMR) students is 30% with the percent of students prepared for the traditional college track below 20%. **Root Cause 7:** The majority of EISD students score well below the 50th percentile on PSAT/SAT and ACT assessments indicating many are not ready for college level work.

Goal 4: Student Support Services: To provide a well-rounded education to increase student achievement.

Performance Objective 2: HEAD START

To implement Head Start program

Evaluation Data Source(s) 2: Increased Kinder Readiness
Head Start compliance

Summative Evaluation 2:

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
1) Implement Head Start program including all ERSEA (Eligibility, Recruitment, Selection, Enrollment, Attendance) related activities as mandated by program requirements.		Early Childhood Director	Informed communication Increased kinder readiness				
	Funding Sources: 205 - Head Start - 10693.00						
2) Provide family style dining and daily snacks for all Head Start students		Site Managers	Improved health and attendance of students				
	Funding Sources: 205 - Head Start - 115000.00						
3) Provide CPR and first aid training to all Head Start staff.		Early Childhood Director	Meet Head Start Compliance, provide trained staff for emergency situations if needed				
	Funding Sources: 205 - Head Start - 4000.00						
4) Provide supplies for daily tooth-brushing and increased cleanliness standards for all Head Start students as required by the program guidelines.		Site Managers	Improved oral care, clean and sanitary rooms less absences due to dental health needs, prevent the spread of germs				
	Funding Sources: 205 - Head Start - 6000.00						
5) Provide department staff to support Head Start Program		Early Childhood Director	Program Compliance				
	Funding Sources: 205 - Head Start - 133884.00						





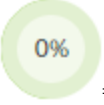

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
6) Provide transportation for Head Start students		Early Childhood Director	Improve attendance at Head Start program				
Funding Sources: 205 - Head Start - 32558.00							
7) Provide electronic devices including computers, printers, screens, etc. as well as supplies and materials to support administration of the Head Start program.		Early Childhood Director	Efficient program operation Compliance standards				
Funding Sources: 205 - Head Start - 5000.00							
= Accomplished = Continue/Modify = No Progress = Discontinue							

Goal 4: Student Support Services: To provide a well-rounded education to increase student achievement.

Performance Objective 3: Early Childhood / Head Start: Provide an aggressive retention and recruitment plan to maintain enrollment in the early childhood program to improve kinder readiness.

Evaluation Data Source(s) 3:

Summative Evaluation 3:

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
1) Conduct recruitment fairs and events throughout the school district, Raise awareness of Head Start program through events and advertising			increase and maintain enrollment				
Funding Sources: 205 - Head Start - 1100.00							
 = Accomplished  = Continue/Modify  = No Progress  = Discontinue							

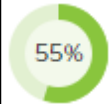



Goal 4: Student Support Services: To provide a well-rounded education to increase student achievement.

Performance Objective 4: Provide support and tools at campuses to prepare for safety of students and staff in the event of an attack or event that puts students and staff at risk of safety.

Evaluation Data Source(s) 4: Trainings with dates
Documented preparation drills

Summative Evaluation 4:

Targeted or ESF High Priority

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
1) All campuses will receive training on Civilian Response to Active Shooter Event (CRASE) & "Stop the Bleeding" in the even of an event that put student or staff lives at risk. Trauma kits will be installed at each campus in strategic hallways for use if needed. Magnetic Strips will be provided for all doors to lock a door as a barrier.		Executive Director of Education Operations/Chief of Police/Director of Student Support Services					
	Funding Sources: 289 -Title IV Part A - Student Support and Academy - 36000.00						
2) Staff will be trained in Mental Health Illness First Aid to provide awareness of mental health and how to respond when encountering a student who is challenged with a situation of urgency.		Director of Student Support					
	Funding Sources: 289 -Title IV Part A - Student Support and Academy - 1000.00						
3) EISD staff will be trained in: - Mental Health First AID Trainer of Trainers. These individuals will train EISD staff district wide. - Stop the Bleeding - Civilian Response to Active Shooter Events (CRASE)		Director of Student Support Services and Chief of Police					
	Funding Sources: 289 -Title IV Part A - Student Support and Academy - 12000.00						
4) District staff will attend conferences to gain knowledge and preparation for School Trauma situations. i.e. state safety conferences		Director of Student Support Services & Chief of Police					
	Funding Sources: 289 -Title IV Part A - Student Support and Academy - 15000.00						

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June

Goal 4: Student Support Services: To provide a well-rounded education to increase student achievement.

Performance Objective 5: Continue to implement a school wide structure and organization for climate and culture. All elementary, middle and high school will implement PSSC/PBIS framework.

Evaluation Data Source(s) 5: PBIS Handbook , surveys, discipline referrals, safety reports

Summative Evaluation 5:

Targeted or ESF High Priority

Goal 4: Student Support Services: To provide a well-rounded education to increase student achievement.

Performance Objective 6: Provide a nutritional snack to all children in the Pre-Kindergarten program.

Evaluation Data Source(s) 6: Cafeteria reports
inclusion in daily Pre-K schedule

Summative Evaluation 6:


Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
1) Designate a daily snack time in each pre-kinder class and provide snack for each student		early childhood director food services director	increased attendance, health, and ability to learn				
Funding Sources: 211 - Title I - 16000.00							
= Accomplished = Continue/Modify = No Progress = Discontinue							

Goal 4: Student Support Services: To provide a well-rounded education to increase student achievement.

Performance Objective 7: Provide resources to students for their physical needs,

Evaluation Data Source(s) 7: Attendance logs and distribution list of resources tied to students.

Summative Evaluation 7:

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
1) Provide glasses, oral hygiene, body hygiene , lice non organic treatments as needed		Student Support Services Director, Health Services Coordinator	Increase attendance rates, academic success				
Funding Sources: 211 - Title I - 1000.00							
							

Goal 4: Student Support Services: To provide a well-rounded education to increase student achievement.

Performance Objective 8: Provide equipment, materials and training to support Outdoor learning for early childhood students

Evaluation Data Source(s) 8: early childhood assessment data

Summative Evaluation 8:

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
1) provide fencing and equipment for early childhood playground areas		Early Childhood Director	Safety and Instructional Growth				
Funding Sources: 205 - Head Start - 0.00							
= Accomplished = Continue/Modify = No Progress = Discontinue							

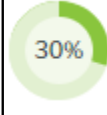

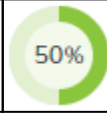

Goal 5: Family/Community Engagement: Build respectful and trustful partnerships with parents and families to improve students' academic success.

Performance Objective 1: FAMILY and COMMUNITY INVOLVEMENT

Increase the number of families involved in school and district events

Evaluation Data Source(s) 1: The performance of this objective will be evaluated by attendance numbers of families participating in meetings and events.

Summative Evaluation 1:

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
1) Provide family engagement activities and events that will assist parents to help improve their child's academic success.		Family Engagement Coordinator	Sign-in documentation data showing attendance trends at parental involvement activities				
	Funding Sources: 211 - Title I - 15000.00						
2) Conduct parent surveys at the beginning of the year and at the end of the year to find out what topics parents are interested in to increase their awareness and participation in meetings.		Family Engagement Coordinator	Results will accommodate parents request for family engagement activities and increase participation.				
	Funding Sources: 211 - Title I - 5000.00						
3) Chess Tournament and mini-tournaments will be held for Elementary and Secondary campuses		Family Engagement Coordinator	Increase attendance at Chess Tournament and Parent Involvement.				
	Funding Sources: 211 - Title I - 10000.00						
4) Conduct bi-monthly Parent Connection Committee meetings at each Head Start campus and schoolwide parent events to enhance parent engagement.		Site Managers	Parent participation in instructionally related meetings, establishing expectation for parent involvement in the children's school activities from the beginning of child's educational career				
	Funding Sources: 205 - Head Start - 3000.00						
5) Facilitate on site Child Development Associate (CDA) credential classes to promote attainment of this credential by parents.		Early Childhood Director	Increased employability of Head Start parents. Increased number of credentialed candidates for district paraprofessional vacancies				
	Funding Sources: 205 - Head Start - 3000.00						

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June

Goal 5: Family/Community Engagement: Build respectful and trustful partnerships with parents and families to improve students' academic success.

Performance Objective 2: Provide Family Engagement resources needed to enhance parent skills

Evaluation Data Source(s) 2: Number of parents who have completed programs and resources provided.

Summative Evaluation 2:

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
1) Family Service Center will provide resources and classes for Edgewood families. ex.(Community Education Classes, GED,ESL,computer literacy, job resources, Food bank, and SAWS assistance)		Family Engagement Coordinator	Parents will have the ability to develop skills to enrich their life to be more knowledgeable to assist their students education.				
	Funding Sources: 211 - Title I - 27000.00						
2) Ensure we have up to date technology and equipment in order to provide services and resources to Edgewood families.		Family Engagement Coordinator	Edgewood parents will be familiar with current technology and resources available.				
	Funding Sources: 211 - Title I - 3000.00						
3) 3) Parent Advisory Council (PAC) for the Migrant Education Program will inform parents of the types of activities/resources that are available to the families of migrant students and connect them to resources (medical, educational, etc.).		Region XX ESC	Parents will be familiar with current resources made available to them.				
	Funding Sources: Region XX Shared Services Agreement - 0.00						
4) Provide a curriculum/workshops/resources & materials (Practical Parent Education & Family Leadership Institute) for parents that will that will focus on topics such as: Understanding your Role as a Parent, Communication, Building Self-Esteem, Building Trust and Character Education. Etc.		Family Engagement Coordinator	Parents will have the ability to develop skills to enrich their life to be more knowledgeable to assist their students education.				
	Funding Sources: 211 - Title I - 16500.00						
5) Family Engagement Coordinator will develop and oversee the campus and district parent engagement program aligned with best practices and ensure compliance; attend professional development sessions and conferences in order to stay abreast of the current updates and policies.		Director	Program implementation and compliance.				
	Funding Sources: 211 - Title I - 93500.00						



= Accomplished



= Continue/Modify



= No Progress



= Discontinue

Goal 5: Family/Community Engagement: Build respectful and trustful partnerships with parents and families to improve students' academic success.

Performance Objective 3: Increase professional development for Family Engagement Coordinator, Parent Liaisons, and Parents.

Evaluation Data Source(s) 3: Sharing knowledge of family engagement policies and practices with staff and community members.

Summative Evaluation 3:

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
1) Attend professional development sessions and conferences		Family Engagement Coordinator	Enhancement of family engagement program and sharing information obtained. Documentation of attendance/participation.				
Funding Sources: 211 - Title I - 3000.00							

RDA Strategies

Goal	Objective	Strategy	Description
1	8	16	Join Region-20 Cooperative for on-going supplemental support for professional development for CTE administration and teachers, curriculum development, pedagogy alignment, and alignment of program to changes of Programs of study.

Edgewood Independent School District

Winston Elementary School

2019-2020

Accountability Rating: F



Mission Statement

Winston Elementary will serve and support our scholars, families, and community to ensure success for every child, every day through communication, community building, and service.

Vision

S.O.A.R. Every scholar, every day!

S - Strive for Excellence

O - Overcome Obstacles

A - Achieve Success

R - Reach New Heights

Value Statement

Core Values:

- Communication
- Community Building
- Service

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Goals

Goal 1: Student Achievement: Improve academic outcomes and prepare students to be career and college ready.

Performance Objective 1: READING and WRITING

- Increase the percentage of students meeting Approaches Grade Level Performance on State of Texas Assessments of Academic Readiness (STAAR) 3- 5 grade Reading from 59% to 70%.
- Increase the percentage of students meeting Meets Grade Level Performance on State of Texas Assessments of Academic Readiness (STAAR) 3- 5 grade Reading from 22% to 35%.
- Increase the percentage of students meeting Masters Grade Level Performance on State of Texas Assessments of Academic Readiness (STAAR) 3- 5 grade Reading from 12% to 22%.
- Increase the percentage of students meeting Approaches Grade Level Performance on STAAR 4th grade Writing from 38% to 60%.
- Increase the percentage of students meeting Meets Grade Level Performance on STAAR 4th grade Writing from 10% to 35%.
- Increase the percentage of students meeting Masters Grade Level Performance on STAAR 4th grade Writing from 2% to 17%.

Evaluation Data Source(s) 1: The performance of this objective will be evaluated using 2020 STAAR Scores.

Summative Evaluation 1:

Strategy Description	Monitor	Strategy's Expected Result/Impact	Reviews			
			Formative			Summative
			Nov	Jan	Apr	June
Comprehensive Support Strategy 1) Students will improve reading and writing through the application of the Balanced Literacy Initiative.	Campus Instructional Leadership Team, Classroom Teacher	Increased student achievement results on unit assessments, benchmarks, STAAR, Istation, NSGRA and formative assessments.				
Funding Sources: 211 - Title I - 5000.00						

Strategy Description	Monitor	Strategy's Expected Result/Impact	Reviews			
			Formative			Summative
			Nov	Jan	Apr	June
2) Students will engage in vertically aligned lessons to include vocabulary development, comprehension, critical thinking, and reading strategies, with depth and complexity based on intensive grade level planning that utilizes supplemental resources and research based strategies.	Administration Team, Literacy Coach	Increased student achievement results on module assessments, benchmarks, STAAR, Renaissance, NSGRA and formative assessments.				
Funding Sources: 211 - Title I - 10000.00						
Comprehensive Support Strategy 3) Students will engage in guided reading lessons with workstations in which text selection is based on student's instructional reading level using Scholastic Leveled Book Room and library resources.	Administration Team, Literacy Coach, Classroom Teacher	Increased student achievement results based on unit assessments, benchmarks, STAAR, Renaissance, HMH Growth Measure, NSGRA and formative assessments.				
Funding Sources: 211 - Title I - 5000.00, 199 - Local - 5000.00						
Comprehensive Support Strategy 4) Students will apply research-based writing strategies across all content areas that ensure Writing Texas Essential Knowledge and Skills (TEKS) are addressed through the use of interactive journals, thinking maps, and foldables.	Campus Instructional Leadership Team, Classroom Teachers	Writing products, student journals.				
Funding Sources: 211 - Title I - 5000.00						
5) Winston Elementary will host Read Across America (RAA) Week to include engaging activities and community members as readers to develop an appreciation of reading.	Campus Instructional Leadership Team, Classroom Teacher, Parent Liaison, Literacy Committee.	Increased amount of community member readers.				
Funding Sources: 199 - Local - 350.00, 211 - Title I - 500.00						
Comprehensive Support Strategy 6) Students will participate in targeted Reading interventions based on data such as iRead, Open Court/Estrellitas (Tier 2), Leveled Literacy Intervention (LLI) for (Tier 3). Students will use Accelerated Reader from Renaissance Learning to help build comprehension and fluency skills.	Campus Instructional Leadership Team, Classroom Teachers	Student performance on module assessments, benchmarks, STAAR, Renaissance Learning, NSGRA, and formative assessments.				
Funding Sources: 199 - Local - 10413.00						
7) Students will increase reading comprehension, fluency, vocabulary, and phonemic awareness through the use of iRead (K-2), Accelerated Reader (K-5), Open Court/Estrellitas (K-5), Scholastic leveled books, Reading A to Z, and literacy workstations.	Campus Instructional Leadership Team, Classroom Teachers	Student performance on unit assessments, benchmarks, Istation, NSGRA, and formative assessments.				
Funding Sources: 211 - Title I - 11000.00						
8) All students will be invited to Winston Family Literacy Night. Faculty and Staff will provide our activities and strategies they can use at home.	Campus Instructional Leadership Team, Classroom Teachers, Parent Liaison, Literacy Committee	Increased student performance on STAAR, Renaissance Learning, HMH Growth Measure, NSGRA, benchmarks and other district assessments.				
Funding Sources: 199 - Local - 1600.00						

Strategy Description	Monitor	Strategy's Expected Result/Impact	Reviews			
			Formative			Summative
			Nov	Jan	Apr	June
9) Teachers, Coaches and Administrators will attend Professional Development to enhance their content knowledge and build sustainability in their careers.						
Funding Sources: 211 - Title I - 5000.00						

Goal 1: Student Achievement: Improve academic outcomes and prepare students to be career and college ready.


Performance Objective 2: EARLY LITERACY

-Increase the end-of-year percentage of students on level in literacy skills for Kindergarten through Second Grade (iStation) literacy skills from 51% to 71%.

Evaluation Data Source(s) 2: The performance of this objective will be evaluated using District Renaissance Early Literacy Screener results.

Summative Evaluation 2:

Targeted or ESF High Priority

Strategy Description	Monitor	Strategy's Expected Result/Impact	Reviews			
			Formative			Summative
			Nov	Jan	Apr	June
1) PreK-2nd grade students' reading ability and skill development will be measured by monthly Istation Indicators of Progress (ISIP) assessments and NSGRA.	Campus Instructional Leadership Team, Classroom Teachers	Increase student performance on CIRCLE (PK), ISIP Results (PK-2), and NSGRA reading levels.				
Funding Sources: 199 - State Compensatory PIC 30 - 2000.00						
2) Students will participate in targeted Reading interventions based on data such as Istation (Tier 2), Leveled Literacy Intervention (LLI) for (Tier 3).	Campus Instructional Leadership Team, Classroom Teachers	Increase student performance on CIRCLE (PK), ISIP Results (PK-2), and NSGRA reading levels.				
Funding Sources: 199 - State Compensatory PIC 30 - 5000.00						
3) Pre-K students will engage in developmentally appropriate lessons that incorporate the Prekindergarten Guidelines (social and emotional development, language and communication, emergent literacy reading and writing, science, and social studies) to ensure Kindergarten Readiness.	Administration Team, Literacy Coaches, Classroom Teachers	Increase student performance on CIRCLE and ISIP results.				
Funding Sources: 199 - State Compensatory PIC 30 - 3000.00						
						

Goal 1: Student Achievement: Improve academic outcomes and prepare students to be career and college ready.

Performance Objective 3: MATH

- Increase the percentage of students meeting Approaches Grade Level Performance on STAAR 3-5 grade Math from 59% to 70%.
- Increase the percentage of students meeting Meets Grade Level Performance on STAAR 3-5 grade Math from 22% to 3%.
- Increase the percentage of students meeting Approaches Grade Level Performance on STAAR 3-5 grade Math from 11% to 22%.

Evaluation Data Source(s) 3: The performance of this objective will be evaluated using 2018-2019 STAAR Scores.

Summative Evaluation 3:

Strategy Description	Monitor	Strategy's Expected Result/Impact	Reviews			
			Formative			Summative
			Nov	Jan	Apr	June
Comprehensive Support Strategy 1) K-2 students will participate in intervention for math fluency based on Texas Early Mathematics Inventory (TEMI) data.	Campus Instructional Leadership Team, Classroom Teacher.	Increased student achievement on TEMI assessments.				
Comprehensive Support Strategy 2) Students will increase their math fluency and skills using Dreambox. Students will participate in a Dreambox challenge to improve math concepts.	Campus Instructional Leadership Team, Classroom Teacher.	Number of lessons completed by students				
Funding Sources: 211 - Title I - 500.00						
3) Students in K-2nd will be monitored and receive small group interventions based on TEMI Diagnostic Results using a variety of manipulatives and hands-on activities	Campus Instructional Leadership Team, Classroom Teacher.	Student performance on unit assessments and TEMI results.				
Funding Sources: 199 - State Compensatory PIC 30 - 850.00						
4) All students will be invited to Winston Family Math Night. Faculty and Staff will provide our activities and strategies they can use at home.	Campus Instructional Leadership Team, Classroom Teacher, Math Committee.	Increased attendance, sign-in sheets.				
Funding Sources: 199 - Local - 300.00						
5) Students will participate in small group instruction using district recommendation such as TEMI system for K-2; and Envision Intervention/ ESTAR intervention for 3rd-5th	Campus Instructional Leadership Team, Classroom Teacher.	Higher number of students passing math assessments				

Strategy Description	Monitor	Strategy's Expected Result/Impact	Reviews			
			Formative			Summative
			Nov	Jan	Apr	June
6) Teachers will attend high quality Professional Development and be trained on new, High-Yield strategies to better prepare our students for success in Math.	Campus Leadership Team, Administration, District PD Department	Increased number of Meets and Masters in 3rd-5th grade. Increased numbers in TEMI K-2.				
Funding Sources: 211 - Title I - 1200.00						
7) Teachers, Coaches and Administrators will attend Professional Development to enhance their content knowledge and build sustainability in their careers.						
Funding Sources: 211 - Title I - 5000.00						



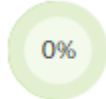

Goal 1: Student Achievement: Improve academic outcomes and prepare students to be career and college ready.

Performance Objective 4: SCIENCE

- Increase the percentage of students meeting Approaches Grade Level Performance on 5th grade Science from 43% to 60%.
- Increase the percentage of students meeting Meets Grade Level Performance on 5th grade Science STAAR from 28% to 35%.
- Increase the percentage of students meeting Masters Grade Level Performance on 5th grade Science STAAR from 6% to 17%.

Evaluation Data Source(s) 4: The performance of this objective will be evaluated using 2018-2019 STAAR Scores.

Summative Evaluation 4:

Strategy Description	Monitor	Strategy's Expected Result/Impact	Reviews			
			Formative			Summative
			Nov	Jan	Apr	June
1) K-5 students will explore scientific processes and applications of real-world scenarios by participating in Science Fair.	Campus Instructional Leadership Team, Classroom Teacher.	Science Project Presentation				
Funding Sources: 199 - State Compensatory PIC 30 - 1000.00						
2) Students will increase vocabulary development through engaging science lessons.	Administration Team, Content Coach, Classroom Teacher.	Increased student achievement results on unit assessments, benchmarks, STAAR, formative assessments.				
Funding Sources: 199 - State Compensatory PIC 30 - 700.00						
3) Students will regularly participate in hands on experiments in the science lab.	Administration Team, Content Coach, Classroom Teacher	Increased student achievement results on unit assessments, benchmarks, STAAR, formative assessments.				
Funding Sources: 199 - State Compensatory PIC 30 - 3000.00						
4) 5th grade students will participate in a Mini-Science Camp in the Spring in preparation for Science STAAR	Campus Instructional Leadership Team, Classroom Teacher	Increased student achievement results on CBA, benchmarks, STAAR				
Funding Sources: 211 - Title I - 2000.00						
5) All students will be invited to Winston Family Science Night. Faculty and Staff will provide our activities and strategies they can use at home.	Administration Team, Content Coach, Classroom Teacher, Science Committee.	Increased attendance, Sign In Sheets.				
 = Accomplished  = Continue/Modify  = No Progress  = Discontinue						

Goal 1: Student Achievement: Improve academic outcomes and prepare students to be career and college ready.

Performance Objective 5: INSTRUCTIONAL TECHNOLOGY

Student Achievement: Increase digital learning activities and computer skills to promote collaboration, creativity, innovation, integration, and critical thinking application.

Evaluation Data Source(s) 5: Increased student performance from Fall to Spring on 5th Grade Technology Benchmark Assessment.

Summative Evaluation 5:

Strategy Description	Monitor	Strategy's Expected Result/Impact	Reviews			
			Formative			Summative
			Nov	Jan	Apr	June
1) Students will participate in engaging technology lessons to support learning in all content areas.	Campus Instructional Leadership Team, Classroom Teacher.	Technology Student Products.				
2) Students will have opportunities to participate in a Technology Club/ Eagle News, create videos, announcements, and literacy and math presentations.	Campus Instructional Leadership Team, Club Sponsor	Increased student results on STAAR, unit assessments, benchmarks, and other district and school assessments.				
Funding Sources: 199 - State Compensatory PIC 30 - 1000.00						

Goal 1: Student Achievement: Improve academic outcomes and prepare students to be career and college ready.

Performance Objective 6: PHYSICAL EDUCATION

Enhance students' educational well-being by developing their physical and social skills through participation in PALS sports and physical education activities, thus promoting life-time fitness.

Evaluation Data Source(s) 6: The performance of this objective will be determined by Fitness Gram data reports and increased student participation in PE programs.

Summative Evaluation 6:

Strategy Description	Monitor	Strategy's Expected Result/Impact	Reviews			
			Formative			Summative
			Nov	Jan	Apr	June
1) All students will participate in weekly activities during physical education that will help promote and acquire a healthy BMI score	Physical Education Coach	Higher number of students with a healthy BMI score compared to last year				

Goal 1: Student Achievement: Improve academic outcomes and prepare students to be career and college ready.


Performance Objective 7: HIGHLY EFFECTIVE INSTRUCTIONAL STAFF and TEACHER RETENTION

-Increase the effectiveness of instructional staff and teacher retention.

-Offer and support the implementation of effective instructional strategies by engaging in the content coaching cycle and targeted professional development.

Evaluation Data Source(s) 7: The performance of this objective will be evaluated using T-TESS Reports, classroom walk-through's, and Eduphoria reports.

Summative Evaluation 7:

Strategy Description	Monitor	Strategy's Expected Result/Impact	Reviews			
			Formative			Summative
			Nov	Jan	Apr	June
1) Teachers will receive a variety of professional development in order to develop professional growth.	Campus Instructional Leadership Team, Classroom Teacher	Increased student achievement and high quality instruction				
Funding Sources: 255 - Title II - 0.00						
2) New and novice teachers will be provided on-going support from an assigned knowledgeable, experienced mentor	Campus Instructional Leadership Team	Mentor Logs, Classroom Walk-through's				
3) Campus meeting will be held at the beginning of the year focusing on expectations.	Campus Instructional Leadership Team	100% Staff Participation				
Funding Sources: 211 - Title I - 300.00						
4) PBIS Committee will provide monthly teacher incentives that will help in retaining highly qualified teachers	PBIS Committee	100% Teacher retention				
Funding Sources: 211 - Title I - 2000.00						
5) Teachers will participate in vertical team meeting, committee meetings, and planning sessions.	Campus Instructional Leadership Team, Classroom Teachers	Increased student achievement and high quality instruction				
Funding Sources: 211 - Title I - 2000.00						
6) Teachers will participate in instructional rounds to develop professional growth.	Campus Instructional Leadership Team, Classroom Teacher.	Increased student achievement and high quality instruction, Teacher reflection and Feedback				
						


Goal 1: Student Achievement: Improve academic outcomes and prepare students to be career and college ready.

Performance Objective 8: MEASUREMENT and ASSESSMENT

-Implement a data analysis routine to measure student achievement and provide feedback on instruction.

Evaluation Data Source(s) 8: Unit Assessments, Exit Tickets, Student Tier Movement

Summative Evaluation 8:

Strategy Description	Monitor	Strategy's Expected Result/Impact	Reviews			
			Formative			Summative
			Nov	Jan	Apr	June
1) Students will participate in curriculum based assessments and benchmarks to monitor student progress in TEKS mastery throughout the year.	Campus Instructional Leadership Team, Classroom Teacher	Increased student achievement results on unit assessments, benchmarks, STAAR and appropriate program assessments.				
Funding Sources: 199 - State Compensatory PIC 30 - 2800.00						
2) Students will set academic goals based on individual data.	Campus Instructional Leadership Team, Classroom Teacher	Goal-setting Records				
3) Teacher will engage in data analysis to determine student tiers, instructional needs, and next steps.	Campus Instructional Leadership Team, Classroom Teacher	Increased student achievement results on unit assessments, benchmarks, STAAR and appropriate program assessments.				
Funding Sources: 211 - Title I - 3500.00						
						





Goal 1: Student Achievement: Improve academic outcomes and prepare students to be career and college ready.

Performance Objective 9: ATTENDANCE and DISCIPLINE

-To increase campus-wide student attendance to 96.5% or higher and reduce the number of discipline issues.

Evaluation Data Source(s) 9: PEIMS reports on student attendance rates

Summative Evaluation 9:

Strategy Description	Monitor	Strategy's Expected Result/Impact	Reviews			
			Formative			Summative
			Nov	Jan	Apr	June
1) PSCC Committee will use data obtained from survey to address campus needs.	Campus Instructional Leadership Team, PBIS Committee	Goal is to have 100% of our students feeling safe on campus				
2) Faculty commitment to PSCC including quarterly data sharing feedback opportunities	Campus Instructional Leadership Team, PBIS Committee	Feedback provided through grade level notes				
3) Implementation of campus wide PSCC Initiative, Pep Rally's, Posters, Eagle Bucks/Store incentives and dances	Campus Instructional Leadership Team, PBIS Committee	Decrease the number of referrals compared to last year				
Funding Sources: 199 - Local - 3500.00						
4) Continued implementation of campus, grade level, and class rewards will be outlined and include: Perfect Attendance awards, Attendance Dance, Spirit Dress Days, daily recognition of perfect attendance, etc... Saturday Attendance Recovery Program instructional tutoring program will continue to be monitored throughout the school year	Campus Instructional Leadership Team, PBIS Committee	Increased ADA				
Funding Sources: 211 - Title I - 3000.00						
 = Accomplished  = Continue/Modify  = No Progress  = Discontinue						

Goal 1: Student Achievement: Improve academic outcomes and prepare students to be career and college ready.


Performance Objective 10: CAREER and COLLEGE READINESS

-To increase performance in Domain III: Closing the Gap

Evaluation Data Source(s) 10: The performance of this objective will be evaluated using advanced level III STAAR performance.

Summative Evaluation 10:

Strategy Description	Monitor	Strategy's Expected Result/Impact	Reviews			
			Formative			Summative
			Nov	Jan	Apr	June
1) Community Members will be invited to participate in Career Day.	Campus Instructional Leadership Team, Counselor, Social Worker, Parent Liaison	Sign In sheets				
Funding Sources: 199 - Local - 597.00						
2) SSI students will receive daily targeted small group reading and math instruction at a 10:1 ratio	Campus Instructional Leadership Team	Higher checkpoints, CBA and Benchmark scores				
Funding Sources: 199 - State Compensatory PIC 30 - 1200.00						
3) Students will participate in the externally-operated after school challenge program providing students with homework assistance, educational games, and enrichment such as fine arts, nutrition, and physical fitness	Executive Director of Elementary Education and Campus Instructional Leadership Team	Improved attendance, grades, promotion, and STAAR reading and math				
4) The MTSS/RtI Committee will meet to review local and state data and make recommendations in regards to instructional setting, students identification, least restrictive environment, discipline, program effectiveness and health concerns	Counselor	Increased student assessment results.				
5) MTSS will be used along with Coordination of Services meetings to monitor progress through notes	MTSS Committee	Increase student achievement results in unit assessments, benchmarks, and STAAR results.				
6) Students who have been identified as At-Risk will be provided targeted small group instruction by the appropriate staff but not limited to the classroom teacher, support staff, counselor, social worker and special education teacher	Campus Instructional Leadership Team	Higher student performance on assessments of identified students				
Funding Sources: 211 - Title I - 15706.00						

Strategy Description	Monitor	Strategy's Expected Result/Impact	Reviews			
			Formative			Summative
			Nov	Jan	Apr	June
7) Teachers and students will set academic goals throughout the school year; students will be recognized for growth made towards their goals during the academic school year	Campus Instructional Leadership Team	Goal setting documents; increased in student performance				
Funding Sources: 211 - Title I - 4000.00						
						

Goal 1: Student Achievement: Improve academic outcomes and prepare students to be career and college ready.

Performance Objective 11: MATH

Increase the end-of-year percentage of students on level in math fluency skills for Kindergarten through Second Grade 50% to 70%.

Evaluation Data Source(s) 11: The performance of this objective will be evaluated using District TEMI data and Unit Assessments

Summative Evaluation 11:

Strategy Description	Monitor	Strategy's Expected Result/Impact	Reviews			
			Formative			Summative
			Nov	Jan	Apr	June
1) Teacher will use Daily Math Fluency Kits (K-5) to help raise the fluency foundation for all students in Number Sense and Fluency.	Campus Leadership Team, Administration, Teachers					
Funding Sources: 211 - Title I - 5000.00						


Goal 2: Organizational Learning and Leadership Development

Performance Objective 1: EFFECTIVE LEADERSHIP

Instructional leader will be knowledgeable and support new district initiatives, curriculum, and instructional strategies.

Evaluation Data Source(s) 1: Attending district and campus professional development, utilizing a variety of resources, data analysis, campus walkthroughs.

Summative Evaluation 1:

Strategy Description	Monitor	Strategy's Expected Result/Impact	Reviews			
			Formative			Summative
			Nov	Jan	Apr	June
1) Students will participate in hands-on, engaging lessons in all content areas of math, science, ELAR and social studies that include Texas Curriculum Management Program Cooperative (TCMPC), and district supplemental documents as a supplemental resource.	Campus Instructional Leadership Team	Increased student performance on curriculum based assessments, STAAR, Kindergarten (K)-1 performance indicators and Envision Diagnostic Tool				
Funding Sources: 211 - Title I - 0.00						
						

Goal 3: Exceptional Learners: To improve instructional programs to meet the needs of all learners.

Performance Objective 1: SPECIAL EDUCATION

- Increase the number of Special Education students meeting the STAAR passing standard Phase-in 1 Level II in grades 3 - 8 (PBMAS Indicators)
- Increase Special Education student performance in Reading STAAR (3-5) from 24% to 35%
- Increase Special Education student performance in 4th grade Writing STAAR from 17% to 35%
- Increase Special Education student performance in Science STAAR 5th grade from 12% to 35%

Evaluation Data Source(s) 1: This objective will be evaluated using 2018-2019 PBMAS results.

Summative Evaluation 1:

Strategy Description	Monitor	Strategy's Expected Result/Impact	Reviews			
			Formative			Summative
			Nov	Jan	Apr	June
1) Students will utilize academic applications on iPads to extend and/or enhance lessons in the classroom.	Campus Instructional Leadership Team	Increased student achievement results on CBA, benchmarks, STAAR and appropriate program assessments.				
2) Special education teachers will use eSped to document ARDs. Bilingual ARDs will be audio recorded. Parents will receive an audio copy of the ARD. Program specialists are meeting with teachers to ensure that teachers have a complete understanding of eSped. Professional development: Ongoing	Campus Instructional Leadership Team	use of eSped for all ARDs				
	Funding Sources: 224 - Title I - SPED PIC 23 - 250.00					
3) Special education teachers will provide consultation and support to general education teachers in the instruction of students with disabilities on a weekly basis.	Campus Instructional Leadership Team	Increased student achievement results on CBA's, benchmarks, STAAR and appropriate program assessments.				
4) Special Education students will be provided services through quality lesson interventions through programs but not limited to Comprehension Toolkit, LLI Reading Intervention Kit.	Campus Instructional Leadership Team	Students performance on assessments				
5) Monitor growth and performance of Special Education students through URS	URS Committe	Student success and performance on assessments.				
6) Special Ed Students will be assessed formally and informally using Leveled Literacy Intervention and Fountas and Pinnell assessments to determine comprehension at the beginning of the year, middle of the year, and end of the year.	Campus Instructional Leadership Team	Student success and performance on assessments.				
	Funding Sources: 224 - Title I - SPED PIC 23 - 1100.00					

Strategy Description	Monitor	Strategy's Expected Result/Impact	Reviews			
			Formative			Summative
			Nov	Jan	Apr	June
7) Students will participate in specialized instruction by a special education teacher targeting individual student needs utilizing a variety of modalities.	Campus Instructional Leadership Team and Special Education Teacher	Increased student achievement results on CBA's, benchmarks, STAAR and appropriate program assessments.				
Funding Sources: 199-Special Education PIC 23 - 1065.00						

Goal 3: Exceptional Learners: To improve instructional programs to meet the needs of all learners.


Performance Objective 2: ENGLISH LANGUAGE LEARNERS (BILINGUAL/ESL)

Increase the number of English learners students meeting the STAAR passing standard Phase-in 1 Level II in grades 3 - 8 (PBMAS Indicators)

- Increase English learners performance in Reading STAAR (3-5) from 68% to 78%.
- Increase English learners performance in Writing STAAR (4) from 55% to 75%
- Increase English learners performance in Science STAAR (5) from 30% to 50%
- Decrease TELPAS beginning and intermediate Composite Rating levels for students in U.S. schools multiple years from ___% to ___%.

Evaluation Data Source(s) 2: The performance of this objective will be measured using STAAR Progress measure or ELL progress measure data.

Summative Evaluation 2:

Strategy Description	Monitor	Strategy's Expected Result/Impact	Reviews			
			Formative			Summative
			Nov	Jan	Apr	June
1) ELL students will develop English language proficiency through participation in sheltered instruction classes, dual language classes, and cultural/academic activities.	Campus Instructional Leadership Team	ELL student performance on curriculum based assessments, Texas English Language Proficiency Assessment System (TELPAS) and STAAR				
Funding Sources: 199-Bilingual PIC 25 - 947.00						
2) ELL students will participate in sheltered instruction classes, dual language classes, and cultural/academic activities to assist with making content comprehensible, develop academic language and increase student achievement.	Campus Instructional Leadership Team	Increased student achievement results on unit assessments, benchmarks, STAAR, TELPAS and appropriate program assessments.				
Funding Sources: 199-Bilingual PIC 25 - 2500.00						
3) Provide training to teachers in sheltered instruction strategies to address the needs of ELL students, such as Questioning, integrating language skills (reading, writing, listening and speaking), use of cognates, building academic language, visual tools, response signals, structured conversations, structured reading and writing activities, and others.	Campus Instructional Leadership Team	Increased EL student achievement results on unit assessments, benchmarks, STAAR, TELPAS and appropriate program assessments.				
						

Goal 3: Exceptional Learners: To improve instructional programs to meet the needs of all learners.

Performance Objective 3: MIGRANT EDUCATION

Ensure that identified Priority for Service (PFS) migrant students have the same opportunity to meet the challenging state, content, and student performance standards expected of all children. 100% of Priority for Service (PFS) migrant students will receive priority access to supplemental instructional and support opportunities.


Increase the number of Migrant students meeting the STAAR passing standard Phase-in 1 Level II in grades 3 - 8 (PBMAS Indicators)

- Increase Migrant student performance in Reading STAAR (3-5) from ___% to ___%
- Increase Migrant student performance in 4th grade Writing from ___% to ___%
- Increase Migrant student performance 5th grade Science from ___% to ___%


Evaluation Data Source(s) 3: Provided through shared service arrangement with Region 20

Summative Evaluation 3:


Strategy Description	Monitor	Strategy's Expected Result/Impact	Reviews			
			Formative			Summative
			Nov	Jan	Apr	June
1) Coordinate with Region 20 Migrant Education Program staff to provide resources, tools and personnel to promote student academic success.	Campus Instructional Leadership Team	Increased benchmark and STAAR scores.				
2) Provide opportunities for campus counselors to participate in the Migrant Counselor Overview session to analyze migrant student educational needs.	Campus Instructional Leadership Team and Counselor	Increase the number of participants to this session by 100%. Sign-in sheets from overviews provided.				
3) Monitor student progress every six-weeks and report progress during URS meetings.	Campus Instructional Leadership Team and Counselor	Increased benchmark and STAAR scores.				
4) Students will participate in small group tutoring sessions during the day on identified weaknesses.	Campus Instructional Leadership Team and Teachers	Increased benchmark and STAAR scores.				




= Accomplished



= Continue/Modify



= No Progress



= Discontinue


Goal 3: Exceptional Learners: To improve instructional programs to meet the needs of all learners.

Performance Objective 4: GIFTED and TALENTED

Increase advanced Level III student performance with Gifted and Talented students in 3rd through 5th grade Reading from 40% to 50%.

Evaluation Data Source(s) 4: Advanced Level III STAAR performance

Summative Evaluation 4:

Strategy Description	Monitor	Strategy's Expected Result/Impact	Reviews			
			Formative			Summative
			Nov	Jan	Apr	June
1) District Elementary GT students will be offered a GT curriculum that includes the GT Texas Performance Standards.	Campus Instructional Leadership Team and GT Teacher	Project completion for every GT student				
Funding Sources: 199 - Gifted & Talented PIC 21 - 625.00						
2) Provide testing materials for GT identification.	Campus Instructional Leadership Team and GT teacher	Increased student performance on advanced level assessments to include PSAT, SAT and ACT				
3) Provide parents GT informational sessions	Campus Instructional Leadership Team and GT teacher	Increased student achievement results on CBA's, benchmarks, STAAR and appropriate program assessments.				
4) Elementary GT students (K-5) will participate in advanced level math lessons.	Campus Instructional Leadership Team and GT Teacher	Final Level II performance				
5) GT students will be provided an additional classroom project to create that is aligned with the grade level appropriate curriculum and topics.	Campus Instructional Leadership Team and GT Teacher	Projects completed and presented to the class				
						

Goal 4: Guidance and Counseling: To provide a well-rounded education in order to increase student achievement.


Performance Objective 1: GUIDANCE PROGRAM

To provide a proactive developmental guidance program that addresses responsive services that supports the social and emotional well-being of students, parents and staff.

Evaluation Data Source(s) 1: Increased academic achievement and graduation rate

Summative Evaluation 1:

Strategy Description	Monitor	Strategy's Expected Result/Impact	Reviews			
			Formative			Summative
			Nov	Jan	Apr	June
1) Counselor and social worker will conduct small groups targeting character traits, social skills and organizational skills, and testing skills.	Campus Instructional Leadership Team	Decrease in the number of discipline referrals				
2) Social workers will utilize curriculum and work with student groups to build social skills, increase morale on campus and encourage community service opportunities completed by students e.g. Random Acts of Kindness	Campus Instructional Leadership Team	Decrease in the number of discipline referrals				
Funding Sources: 199 - Local - 1649.00						
3) Counselors and Social Workers will organize events to promote positive family relationships. e.g. Donuts with Dad, Grandparent's Day, and Muffins with Mom.	Campus Instructional Leadership Team	Positive survey results				
Funding Sources: 199 - Local - 796.00						
4) Social Workers will provide case management to our students that need on-going counseling. They will provide intense case management to include home visits.	Campus Instructional Leadership Team	Increase in Student Academic Success.				
Funding Sources: 199 - Local - 300.00						
5) Student Support Services Staff members will participate in department meetings, professional development conferences and workshops.	Campus Instructional Leadership Team	Increase knowledge of researched based techniques.				
Funding Sources: 199 - Local - 7000.00						
6) Identify homeless students and coordinate support services to ensure that homeless students are present at school	Campus Instructional Leadership Team	Increased attendance rate for homeless student population				
7) Implementation of anti-bullying comprehensive curriculum in K-12 classrooms	Campus Instructional Leadership Team	Decreased number of bullying incidents				

Strategy Description	Monitor	Strategy's Expected Result/Impact	Reviews			
			Formative			Summative
			Nov	Jan	Apr	June
8) Utilize an online (computer and hand held devices) reporting system to give students and parents an additional option for reporting bullying situations for middle and high school students. Elementary schools use bullying boxes. This allows for quick response time from a designated staff member.	Campus Instructional Leadership Team	Increase in the number of situations handled within 24 hours				
Funding Sources: 199 - Local - 766.00						
9) Counselors and Social Workers will provide training opportunities on anti-bullying prevention, policy and procedures to students, staff and parents	Campus Instructional Leadership Team	Positive survey results and reduced bullying incidents				
10) Childsafe will provide required training on child and sex abuse reporting policies to all staff members	Campus Instructional Leadership Team	Childsafe reports				
11) Counselors and Social Workers will provide training opportunities on suicide prevention, policy and procedures to students, staff and parents.	Campus Instructional Leadership Team and Director of Student Support Services	Student Support Service log				
12) The Counselor will provide monthly counseling lessons in the classroom to all grade levels.	Campus Instructional Leadership Team	Number of lessons documented in their system				
Funding Sources: 199 - Local - 500.00						
13) Students will participate in PBIS Rally's that will help promote desired discipline and our SOAR expectations	PBIS Committee	Lower number of discipline referrals compared to last year				
14) Implementation of campus wide PBIS Initiative, Pep Rally's, Posters, Eagle Store, incentives and dances.	PBIS Committee	Decrease the number of referrals compared to last year				
15) Social workers will utilize curriculum and work with student groups to build social skills, increase morale on campus and encourage community service opportunities completed by students.	Campus Instructional Leadership Team, Director of Student Support Services	Decrease in the number of discipline referrals				
						

Goal 4: Guidance and Counseling: To provide a well-rounded education in order to increase student achievement.

Performance Objective 2: GRADUATION and DROPOUT PREVENTION

-To increase the graduation rate

Evaluation Data Source(s) 2: Increase in graduation rate; the performance of this objective will be evaluated using School Age Parent Program (SAPP) reports and district graduation reports

Summative Evaluation 2:


Strategy Description	Monitor	Strategy's Expected Result/Impact	Reviews			
			Formative			Summative
			Nov	Jan	Apr	June
1) Students will participate in summer school acceleration/enrichment programs to prepare them for subsequent grade levels.	Campus Instructional Leadership Team	Meet requirement for promotion to subsequent grade level				
Funding Sources: 211 - Title I - 0.00						

Goal 4: Guidance and Counseling: To provide a well-rounded education in order to increase student achievement.

Performance Objective 3: Decrease the number of students whose health screenings go unaddressed to fewer than 6.8% for vision, and fewer than 1.6% for hearing.

Evaluation Data Source(s) 3: The performance of this objective will be evaluated using reports from the Child Health Reporting System.

Summative Evaluation 3:

Strategy Description	Monitor	Strategy's Expected Result/Impact	Reviews			
			Formative			Summative
			Nov	Jan	Apr	June
1) School nurses will connect with parents of students who are uninsured to resources providing assistance for the identified needs(s).	Nurse	Student referral log data				
Funding Sources: 199 - Local - 160.00						
						

Goal 5: Parental/Community Engagement: Build respectful and trustful partnerships with parents and families to improve students' academic success.

Performance Objective 1: PARENTAL and COMMUNITY INVOLVEMENT

Increase the number of parents involved in their children's school by 10%.

Evaluation Data Source(s) 1: The performance of this objective will be evaluated by attendance numbers of parents participating in meetings and events.

Summative Evaluation 1:

Strategy Description	Monitor	Strategy's Expected Result/Impact	Reviews			
			Formative			Summative
			Nov	Jan	Apr	June
TEA Priorities Improve low-performing schools 1) Parents Liaison will keep social media and phone messenger updated weekly with new information, relevant dates and monthly projects	Family and Community Liaison	Increased parental involvement as measured through campus events, such as Coffee with the Principal, parent meetings, family events and other relevant activities.				
2) Conduct surveys to parents at the beginning of the year and at the end of the year to find out what topics parents are interested in to increase their awareness and participation in meetings.	Campus Instructional Leadership Team and Parent Liaison	Number of Returned Surveys				
3) Family and Community Liaison along with other department members will conduct a Community Walk once a month to visit families and share department services and encourage parents to get involved.	Family and Community Department	Increased student attendance and parent involvement based on increased parent attendance at family events and decreased office referral for student behaviors.				
TEA Priorities Improve low-performing schools 4) Parent Liaison will promote the Parent Portal (Tx Connect) to parents. This will help parents keep up with their child's progress. Parent Liaison will also assist and provide services to parents using the district, campus, or internet via an iPad or laptop.	Campus Instructional Leadership Team and Parent Liaison	Number of parents using Parents Portal.				
Funding Sources: 211 - Title I - 1000.00						
5) Parent Liaison will send out a Campus Newsletter, flyers, and digital media, such as, Remind 101 (English & Spanish) keeping parents informed and up to date with campus activities.	Campus Instructional Leadership Team and Parent Liaison	Increase in Parental Involvement.				

Strategy Description	Monitor	Strategy's Expected Result/Impact	Reviews			
			Formative			Summative
			Nov	Jan	Apr	June
6) Increase parent involvement with a district-wide PTA initiative for all campuses, to include the PTA Summit.	Campus Instructional Leadership Team and Parent Liaison	Increase in Parental Involvement.				
7) Collaborate with Curriculum Staff to conduct workshops for parents and deliver strategies and skills increase student mastery of the the TEKS. In addition present to parents strategies on how to support their child's learning. Parents will be trained on strategies tp help build literacy skills at home and school.	Campus Instructional Leadership Team and Family and Community Liaison	Increased student outcomes.				
8) Parent Liaison will work with the Special Education Department to provide resources and workshops to parents of students in Special Education.	Campus Instructional Leadership Team and Parent Liaison	Sign in sheets and flyers				
9) Family and Community Liaison will provide training sessions, tools, meetings and activities on all core content areas to help parents and teachers develop skills to support learning at home during the school year and summer months to help transition into the next school grade.	Campus Instructional Leadership Team	Survey of parents at the end of each training in order to generate understanding of content area and increase knowledge of materials presented.				
Funding Sources: 211 - Title I - 4500.00						
10) Classroom teachers and students will be given a variety of incentives to promote parents joining PTA.	Family and Community Liaison and PTA Officer	Higher number of parents joining PTA compared to the previous year.				
11) To follow board policy, CPOC will include parent and community members.	Campus Instructional Leadership Team and Parent Liaison	Sign In sheets				
12) Winston Elementary will provide students with a Career Day through JA in a Day to explore career choices and academic paths.	Counselor	High evidence of personnel participating				
13) Classroom teachers will hold Open House 2 times a year and Meet the Teacher Night at the beginning of the year to increase parent involvement .	Campus Instructional Leadership Team	Sign In sheets showing higher number of parents attending Open House/ Meet the Teacher compared to last year.				
Funding Sources: 211 - Title I - 2500.00						
14) Family and Community Liaison will attend professional development, then share new ideas with parents on campus	Campus Instructional Leadership Team	Parent Liaison attendance of at least 1 professional development				
Funding Sources: 211 - Title I - 250.00						

Strategy Description	Monitor	Strategy's Expected Result/Impact	Reviews			
			Formative			Summative
			Nov	Jan	Apr	June
<p>TEA Priorities Improve low-performing schools</p> <p>15) Winston will implement Watch D.O.G.S. (Dads of great students) and will provide positive male role models, demonstrating by their presence that education is important. This will increase academic performance and self esteem and will reduce bullying.</p>	Family and Community Liaison	Increased parental involvement and student outcomes, including attendance and performance on academic assessments as well as a decrease in bullying.				
Funding Sources: 211 - Title I - 900.00						

Comprehensive Support Strategies

Goal	Objective	Strategy	Description
1	1	1	Students will improve reading and writing through the application of the Balanced Literacy Initiative.
1	1	3	Students will engage in guided reading lessons with workstations in which text selection is based on student's instructional reading level using Scholastic Leveled Book Room and library resources.
1	1	4	Students will apply research-based writing strategies across all content areas that ensure Writing Texas Essential Knowledge and Skills (TEKS) are addressed through the use of interactive journals, thinking maps, and foldables.
1	1	6	Students will participate in targeted Reading interventions based on data such as iRead, Open Court/Estrellitas (Tier 2), Leveled Literacy Intervention (LLI) for (Tier 3). Students will use Accelerated Reader from Renaissance Learning to help build comprehension and fluency skills.
1	3	1	K-2 students will participate in intervention for math fluency based on Texas Early Mathematics Inventory (TEMI) data.
1	3	2	Students will increase their math fluency and skills using Dreambox. Students will participate in a Dreambox challenge to improve math concepts.

Campus Turnaround Plan

District Name:	Superintendent:	DCSI:	Board President:
Edgewood ISD	Dr. Eduardo Hernández	Leticia Cerda Rodriguez	Mr. Roy Soto
Campus Name:	Campus Number:	Principal:	Principal Supervisor:
Winston Elementary	150905116	Claudia Sánchez	Dr. Kimberly Madkins
School Year Plan was Developed:	ESF Diagnostic Date:	ESF Facilitator:	Date of Board Approval:
2019-2020	9/19/2019	Sylvia de la Peña	

Turnaround Method

Select the turnaround method your campus is pursuing. See the Description of Methods guidance document for more information.

Method	Description	Check one
School Improvement	Improve foundational practices at the campus by working with a vetted improvement program and/or developing an internal capacity building plan.	<input checked="" type="checkbox"/>
School Action-Reassign	Close the low-performing campus and reassign students to higher performing (A or B rated) campuses or new campuses.	<input type="checkbox"/>
School Action-Restart: District Managed	Restart a school by implementing the Accelerating Campus Excellence model or ACE-like model (including Accelerating Campus Excellence (ACE) turnaround plans).	<input type="checkbox"/>
School Action-Restart: Partner Managed	Restart a school with a Texas Partnership with an existing operator with a track record of success	<input type="checkbox"/>
School Action-New School: District-Managed	Create or phase in a new school managed by the district at a new or existing facility	<input type="checkbox"/>
School Action-New School: Partner Managed	Create or phase in a new school with a Texas Partnership at a new or existing facility	<input type="checkbox"/>

Outcomes

*For each essential action, describe the **current implementation level** on the campus (using the ESF Diagnostic Summary Report) and what **full implementation** will look like on this campus. Reference the Key Practices in the Effective Schools Framework to develop the vision. Campuses should strive to be at or near full implementation within two years after implementing this Turnaround Plan for two years.*

1.1 Develop campus instructional leaders with clear roles and responsibilities.

Current Implementation: Summary

Implementation Level At Diagnostic	<p>We currently have written district generated roles and responsibilities for each leadership job. Leadership team meetings occur weekly and are observed and evaluated by district staff using a rubric which rates roles and responsibilities, levels of practice in planning and preparing, leader as presenter and facilitator, member participation and outcomes. Feedback is not consistently given by district staff. Campus Instructional Leadership Team (CILT) also rates meeting for areas of strenghts and areas that need to be refined. TTESS observations are planned and scheduled. Developing our teacher practice is aligned to the Get Better Faster and Student-Centered Coaching Models when providing feedback and support. Instructional leaders use agendas for their department and grade level meetings. Agenda protocol includes: Purpose of meeting, outcomes, follow-up, activities and includes goals for literacy, attendance, college and career readiness (STAAR performance at grade level). Math and Reading Instructional Coaches indicate much of principal’s coaching is in real time or during weekly leadership team meetings. Conversations are both formal and informal. Principal models tools and techniques as observed during 3rd grade PLC. Currently, CLT members use agendas to guide meetings on observation and feedback cycles, data meetings and EDGE Meetings. CLT members calendarize observation and feedback cycles including formal observations, informal walkthroughs, Quick Checks for Learning (QCL) and coaching walks. Time for reflection is scheduled by principal. Principal schedules time for observation and feedback while instructional coaches are planning, live coaching and deliberate modeling of instructional strategies in EDGE Meetings. District Leadership meets at least every two weeks with CLT/Principal to provide feedback. CLT Members use a Coaching Impact Log, Observation and Feedback Tracking Tool and Calendarization of observations to ensure instructional responsibilities are met.</p>
Beginning Implementation	
Prioritized Focus Area from ESF Diagnostic?	
No	

Full Implementation: Vision

At full implementation, we will have a campus generated list of roles and responsibilites as well as job performance criteria that aligns to the district's vision for each member of the leadership team. District leadership will support our CILT weekly meetings by providing observation and feedback on areas on strength and areas of refinement. A record of all meetings will be kept through agendas with detailed notes and follow-up commitments and person responsible for each action item. This will ensure high levels of clarity and understanding of each person's role and responsibility a member of the CILT. The Principal will develop the Assistant Principal, Instructional Coaches and Teacher Leaders through job-embedded PD and observation and feedback cycles.

2.1 Recruit, select, assign, induct and retain a full staff of highly qualified educators.

Current Implementation: Summary

Implementation Level At Diagnostic	Recruitment, selection and induction practices are primarily district driven. District markets, recruits, approves applicants and contacts applicants selected through a campus committee. District provides Teacher Job Fair Interview Rating Forms which campus uses to initially rate and recommend potential candidates. Campus leadership is involved in the selection process once the candidate has been cleared for an interview. Teacher leaders participate in the interviewing process. Campus does not have an explicit definition of a high performing teacher.
Beginning Implementation	
Prioritized Focus Area from ESF Diagnostic?	Teacher placements are strategic, based on performance and campus need. Teacher data and STAAR outcomes data provides some context around assignments. A teacher leadership application was issued to staff this year and 5 teacher leaders have been selected. This is the first-time teacher leaders have applied for the position. Job description was developed by Office of School Leadership. Teachers state they feel supported and comfortable asking for assistance. Administrative team and one selected teacher leader attended the Harvard School Turnaround Program in 2018-19. Good substitutes are difficult to find. Those that are effective are encouraged to return. Others have been prohibited from returning. Substitutes are processed through district.
No	

Full Implementation: Vision

At the full implementation phase, the district will work cooperatively to meet the needs of the individual campus. This may include attending job fairs, getting referrals for new hires from high performing teachers and staff members, and advertisement through social media. The school, in conjunction with the district, will employ marketing tools to promote the campus as a positive work environment. When selecting candidates through screening interviews, the candidates with the highest scores will be invited for a second interview where they will do a lesson demonstration. The interview committee will consist of CLT members, as well as a teacher panel. During the interview process, questions will focus on content knowledge, culture, and mission/vision/core values. When looking at teacher placement from year to year, we will look at student data as well as content knowledge, experience, and team diversity to make sure teachers are in the best fit position. High performing teachers are rewarded through leadership opportunities, career advancement, and recognition. Professional development opportunities will be differentiated and are based on teacher need. CLT will support teachers through coaching and feedback cycle and training for leadership opportunities. Substitutes will be selected and trained on campus protocols and systems in place, while ensuring that we foster positive relationships with our substitutes to ensure we meet the needs of the campus.

3.1 Compelling and aligned vision, mission, goals, values focused on a safe environment and high expectations.

<u>Current Implementation: Summary</u>	
Implementation Level At Diagnostic	Current mission and vision were developed in 2018 through a visioning activity in a collaborative effort which included multiple stakeholders. Classrooms demonstrate high expectations and shared ownership as evidenced by posters primarily around classroom discipline, procedures and routines. Positive School Culture and Climate (PSCC) posters are in each classroom and in hallways. CHAMPS posters, rules and expectations and adherence to following rules are evident in most classrooms. Social and emotional check-in posters are also used in each classroom. High expectations, primarily through providing interventions, reteach, and corrective action are evident. Recognition of student success is observed through praise, feedback, encouragement, use of strategies and posters with positive messages. There is consistency of posted learning targets that detail what and how students will learn. Student work is highlighted in the hallway outside of classrooms. Goals for literacy, attendance, college and career readiness are printed on PLC, CLT, Faculty Meeting and Team Planning agendas. Campus vision posters are in each classroom, hallways, and cafeteria. Academic growth is evident from cohort to cohort in reading, math and science which they attribute to common area expectations aligned to mission and vision. Informal campus surveys are occasionally developed by leadership teams to assess instructional activities. The district provided climate survey was initiated at the end of 2017. Communication, community building and teacher value were identified as top three areas. During development of mission and vision in 2018-19 these three areas were addressed.
Beginning Implementation	
Prioritized Focus Area from ESF Diagnostic?	
No	
<u>Full Implementation: Vision</u>	
At full implementation, we consistently revisit our mission and vision to maintain its fidelity through our daily actions. School staff, students, and community members will engage in revisiting the school mission, vision and core values. Mission and vision can be articulated by all stakeholders and are clearly defined and posted in all classrooms, common areas of the school and shared spaces. All routines, procedures, and expectations are aligned to the mission and vision of Winston Elementary and are aligned to student and staff handbooks. Our students and staff procedures and expectations are in writing, accessible to all, and consistently implemented with fidelity. High expectations are the norm for all stakeholders-administration, staff, students, parents and community members and we hold each other accountable. Hallways and classrooms will display student work, positive messages, rules and expectations, and PSCC guidelines. At the beginning of each year we will have strong monitoring of students in common areas of the school and less structured areas such as recess, cafeteria, morning arrival and afternoon dismissal. Climate surveys will be administered to staff, faculty, and community members at least once a year and interim surveys will be conducted with staff during faculty meetings, parent surveys during parent sessions, and students during school assemblies. We will create a positive campus culture with high expectations for all.	

4.1 Curriculum and assessments aligned to TEKS with a year-long scope and sequence.

Current Implementation: Summary

Implementation Level At Diagnostic	<p>Campus pre-work indicates unit resources, pacing guides and HMH (new curriculum guide) are aligned to TEKS. Units are logically sequenced. Teachers meet with instructional coaches to backwards plan, using curriculum resources. According to focus groups, assessments are primarily scheduled to be administered after each unit and are aligned to state standards. Assessments in the past have primarily been district created (released STAAR items), modules aligned to Unit Resource Guides and E STAAR math from TEA. This year assessments will be aligned to HMH as well as URGs. No assessment artifacts were available for this school year as evidence of prioritization and rigor. An assessment artifact from 2018-19 showed use of released items including open ended question. Corrective instruction is built into HMH as evidenced in observed PLC and as part of the data planning protocol. There are instructional materials available for teachers to use, i.e. district selected literacy texts (HMH) that go with the unit resource guides. Students were observed using instructional materials in 4/15 classes. Fidelity of implementation is monitored by instructional coaches during PLC planning and follow-up observations. Did not observe or receive resource documents with accommodations to support students with disabilities and English Learners. A calendar for ongoing job-embedded professional development was not available. During Administrator and Teacher Focus Groups, professional development was explained as primarily job-embedded and content focused and facilitated by instructional coaches/administration through PLC or district staff development days. A district Department of Teaching and Learning Professional Development Calendar is available for 2019-20 in all content areas. Training is not specific to campus.</p>
Beginning Implementation	
Prioritized Focus Area from ESF Diagnostic?	
No	

Full Implementation: Vision

At full implementation, we will have a refined scope and sequence, units, and assessments will be aligned to the standards for all tested subject and grade areas, and grades PK-2nd mathematics and reading. Assessments will be aligned to state standards and appropriate level of rigor will be administered at least three to four times per year to determine if students learned what was taught. Time for corrective instruction is built into the scope and sequence. Instructional materials with key ideas, essential questions, and recommended materials, including content-rich texts, are used across classrooms. The instructional materials include resources intentionally designed to meet the needs of students with disabilities and English learners among other student groups. Campuses implement high fidelity professional development calendars for teachers that provide introductory and ongoing content-focused, job-embedded training linked to high-quality curricular resources for early childhood through grade 12, in all core subjects.

5.1 Objective-driven daily lesson plans with formative assessments.

Current Implementation: Summary

Implementation Level At Diagnostic	<p>Campus expectation is that weekly lesson plans will be submitted by Sunday night. District policy regarding submission and development of lesson plans has been made with input from teachers' union. Leadership feels it is a basic lesson plan, which is more reflective than substantive, therefore, no formal feedback is provided. Sample lesson plan for PK-2 was submitted as an artifact, however, no date is indicated on lesson plan. No evidence of clear objectives, opening activities, time allotments that indicate the amount of time spent on each step of the lesson, multiple, differentiated paths of instruction to a clearly defined curricular goal, including paths to meet the specific needs of students with disabilities and English learners among other student groups, and daily formative assessments along with exemplar responses. Teacher Focus Group stated that detailed elements of the lesson could be found in URG and HMM (curriculum guide) and contain daily objectives, activities, day stamped, differentiated paths of instruction and formative assessments. Sample not provided. No formalized method of reviewing lesson plans and providing feedback for alignment to the standards, the scope and sequence, expected level of rigor, feedback and support. However, beginning, December 2019, lesson plan template reflects changes that include daily learning targets, target questions, differentiated small group instruction, time stamps, and daily formative assessments</p>
Planning for Implementation	
Prioritized Focus Area from ESF Diagnostic?	
Yes	

Full Implementation: Vision

At full implementation, we would want all teachers to create and submit daily lesson plans that include clear objectives, opening activities, time spent on each step of the lesson, multiple, differentiated paths of instruction to a clearly defined curricular goal, including paths to meet the specific needs of students with disabilities and English learners among other student groups, and daily formative assessments along with exemplar responses. Campus instructional leaders review lesson plans frequently for alignment to the standards, the scope and sequence, and the expected level of rigor, and provide teachers with feedback and lesson planning support.

5.3 Data-driven instruction.

Current Implementation: Summary	
Implementation Level At Diagnostic	<p>There was no formal campus assessment calendar provided. Administrator Focus Group, however, spoke to an assessment calendar that outlines assessment date, scan date, results analysis, plan and review. They indicated data is reviewed, analyzed and interventions planned during PLC and leadership team meetings. This practice for 2019-20 was just beginning. Reference was made to previous week’s meeting. Discussion was more about reteaching the TEKS versus data analysis. During PLC observation, math coach referenced a TEKS deconstruction graphic organizer teachers had previously used for unpacking the targeted TEKS.</p> <p>Components of the agenda included grade level, date, purpose, outcome, time, notes and follow-up activities. A heat map of how students had previously performed on the targeted TEKS was available, but was minimally referenced. The conceptual gaps were identified, and specific error and misunderstanding were named. Teachers discussed how they would reteach and check for evidence of learning. Planning the reteach process not fully observed. Practice the reteach was not observed. Teacher Group states they do meet weekly in a structure referred to as EDGE/PLC. Even though the Teacher Focus Group stated they meet weekly there was no evidence provided of scheduled weekly PLC/grade level planning meeting calendar. Teachers state they meet as needed during their conference or afterschool or Saturdays. There is no/little evidence of student progress toward measurable goals. Focus groups spoke of goal setting and progress tracking last year. They shared that they plan to begin after first unit assessment.</p>
Beginning Implementation	
Prioritized Focus Area from ESF Diagnostic?	
Yes	
Full Implementation: Vision	
<p>At full implementation, campus instructional leaders review disaggregated data to track and monitor the progress of all students and provide evidence-based feedback to teachers. Teachers use a corrective instruction action planning process, individually and in PLCs to analyze data, identify trends in student misconceptions, determine the root cause as to why students may not have learned the concept, and create plans to reteach. Teachers use a corrective instruction action planning process, individually and in PLCs to analyze data, identify trends in student misconceptions, determine the root cause as to why students may not have learned the concept, and create plans to reteach. Teacher teams have protected time built into the master schedule to meet frequently and regularly for in-depth conversations about formative and interim student data, effective instructional strategies, and possible adjustments to instructional delivery focused on meeting the needs of both struggling learners and learners needing acceleration. Student progress toward measurable goals (e.g. % of class and individual student mastering of objectives, individual student fluency progress, etc.) is visible in each and every classroom and throughout the school to foster student ownership and goal setting.</p>	

Edgewood Independent School District

Brentwood Middle School

2019-2020

Accountability Rating: F



Mission Statement

At Brentwood Middle School, we believe in building capacity of students and staff so they have the tools and confidence to own the direction of their future.

Vision

To prepare students for success in 9th grade and beyond.

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Goals

Goal 1: Student Achievement: Increase student academic performance in grades 6-8.

Performance Objective 1: READING/WRITING

Reading:

- Increase the percentage of students meeting Approaches Grade Level Performance: Increase the APPROACHES percentage from 61 to 76% on the combined scores of 6th-8th grade Reading STAAR.
- Increase the percentage of students meeting Meets Grade Level Performance: Increase the MEETS percentage from 23 to 33% on the combined scores from 6th-8th grade Reading STAAR.
- Increase the percentage of students meeting Masters Grade Level Performance: Increase the MASTERS percentage from 9 to 16% on the combined scores of the 6th-8th grade Reading STAAR.

Writing:


- Increase the percentage of students meeting the Approaches Grade Level Performance: Increase the APPROACHES percentage from 40 to 55% on the 7th Grade Writing STAAR.
- Increase the percentage of students meeting Meets Grade Level Performance: Increase the MEETS percentage from 12 to 22% on the 7th grade Writing STAAR.
- Increase the percentage of students meeting Masters Grade Level Performance: Increase the MASTERS percentage from 1 to 8% on the 7th grade Writing STAAR.

Evaluation Data Source(s) 1: The performance of this objective will be evaluated using 2018-2019 STAAR Scores.

Summative Evaluation 1:

Strategy Description	Monitor	Strategy's Expected Result/Impact	Reviews			
			Formative			Summative
			Nov	Jan	Apr	June
Comprehensive Support Strategy Additional Targeted Support Strategy 1) Provide staff development for Dyslexia teachers to identify and service students in the Dyslexia Program.	Dyslexia/504 Specialist	Increased student performance in state, district, and local assessments.				
Funding Sources: 199 - Local - 3000.00						

Strategy Description	Monitor	Strategy's Expected Result/Impact	Reviews			
			Formative			Summative
			Nov	Jan	Apr	June
2) Provide reference materials for ELA-R teachers geared at professional growth and content deepening and provide class sets of reading material to be used for teachers and students.						
Funding Sources: 211 - Title I - 1500.00						
3) Provide mentor texts, for student usage, through modeling, guided practice, and independent mastery.	Instructional Coach	Increased student performance in unit and state assessments, as well as comprehension and fluency.				
Funding Sources: 211 - Title I - 2000.00						
4) Provide a diverse set of mentor texts that span multiple genres and contents.	ELAR Instructional Coach	Increase in academic performance due to increase in reading capacity of students.				
Funding Sources: 199 - Local - 900.00						
5) Create classroom libraries in all contents.	Instructional Coach	Create classroom libraries in all contents.				
Funding Sources: 211 - Title I - 1500.00, 199 - State Compensatory PIC 30 - 0.00						
6) Provide students with access to authentic and diverse texts.	ELAR Instructional Coach	Increase in academic performance due to increase reading capacity of students.				
Funding Sources: 211 - Title I - 750.00						
7) Create reading spaces throughout the campus.	ELAR Instructional Coach	Increase student stamina and fluency.				
Funding Sources: 199 - Local - 1700.00, 199 - State Compensatory PIC 30 - 8200.00						
8) Provide reading and writing incentives to students participating in reading and writing enrichment activities.	ELAR Instructional Coach	Increase in academic performance due to an increase in student reading stamina and fluency.				
Funding Sources: 211 - Title I - 1990.00						
9) Provide students with supplemental aids that support their learning during instructional time.	ELAR Instructional Coach	Increased awareness of the usage of the strategies, and continued in-class practice, will allow students to increase their ability to demonstrate content mastery on campus, district, and state assessments.				
Funding Sources: 211 - Title I - 260.00						
10) Provide students with collaborative and interactive experiences to internalize their learning.	Instructional Coach	Increased ability to demonstrate content mastery on campus, district, and state assessments.				
Funding Sources: 199 - Local - 1100.00						
11) Create a print-rich environment to ensure students have access to reading and writing texts in a variety of genres.	ELAR Instructional Coach	Increase in academic performance due to an increase in student reading and writing stamina and overall exposure to author's craft and development of ideas.				
Funding Sources: 211 - Title I - 500.00, 199 - State Compensatory PIC 30 - 1100.00						
12) Provide students with manipulatives and materials for collaborative and independent practice when learning concepts and skills.	Instructional Coach	Increase in performance on unit, district, and state assessments.				
Funding Sources: 211 - Title I - 9400.00						

Strategy Description	Monitor	Strategy's Expected Result/Impact	Reviews			
			Formative			Summative
			Nov	Jan	Apr	June
						

Goal 1: Student Achievement: Increase student academic performance in grades 6-8.

Performance Objective 2: MATHEMATICS

6th Grade Math:

-Increase the percentage of students meeting Approaches Grade Level Performance: Increase the APPROACHES percentage from 59% to 65% on 6th Grade Math STAAR.

-Increase the percentage of students meeting the Meets Grade Level Performance: Increase the MEETS percentages from 16% to 40% on 6th Grade Math STAAR.

-Increase the percentage of students meeting the Masters Grade Level Performance: Increase the MASTERS percentage from 6% to 15% on the 6th Grade Math STAAR.

7th Grade Math:

-Increase the percentage of students meeting Approaches Grade Level Performance: Increase the APPROACHES percentage from 59% to 65% on 7th Grade Math STAAR.

-Increase the percentage of students meeting Meets Grade Level Performance: Increase the MEETS percentages from 22% to 40% on 7th Grade Math STAAR.

-Increase the percentage of students meeting the Masters Grade Level Performance: Increase the MASTERS percentage from 5% to 15% on 7th Grade Math STAAR.

8th Grade Algebra 1 EOC:

-Increase the percentage of students meeting Approaches Grade Level Performance: APPROACHES percentage above 90% on the Algebra EOC.


-Increase the percentage of students meeting Meets Grade Level Performance: MEETS percentage above 45% on the Algebra EOC.

-Increase the percentage of students meeting Masters Grade Level Performance: MASTERS percentage above 25% on the Algebra EOC.

- Increase the percentage of students meeting Approaches Grade Level Performance: Satisfactory standard in Index 1: Student Achievement from 56% to 70%.

Evaluation Data Source(s) 2: State assessments, unit exams; The performance of this objective will be evaluated using 2018-2019 STAAR Scores.

Summative Evaluation 2:

Strategy Description	Monitor	Strategy's Expected Result/Impact	Reviews			
			Formative			Summative
			Nov	Jan	Apr	June
Comprehensive Support Strategy Additional Targeted Support Strategy 1) Students will use mathematical processes to acquire and demonstrate a district problem solving model that incorporates analyzing, planning, solving, and justifying/evaluating.	District Math Specialists	Increased student achievement on unit/common assessments, benchmarks, STAAR, and performance tasks that indicate a problem solving model is utilized.				
	Funding Sources: 255 - Title II - 1000.00					
Comprehensive Support Strategy Additional Targeted Support Strategy 2) Students will use internet-based instructional materials on a variety of platforms to increase learning and achievement in the math classroom.	District Math Specialists	Increased student performance on unit/common assessments, benchmarks, STAAR and software performance data.				
	Funding Sources: 199 - State Compensatory PIC 30 - 350000.00					
3) Provide Math Night to Increase Community Involvement and Understanding on Math Curriculum.	Math Instructional Coach	Increased community involvement in building a math literacy culture.				
	Funding Sources: 199 - State Compensatory PIC 30 - 1500.00					
4) Provide students will resources and supplies to improve academic achievement in math classrooms.	Math Instructional Coach	Increased academic achievement in mathematics in 6th, 7th and 8th.				
	Funding Sources: 211 - Title I - SIG (School Improvement Grant) - 7500.00					
5) Provide students will STAAR resources to improve academic achievement on state assessment.	Math Instructional Coach	Increased Math STAAR academic achievement in mathematics in 6th Math, 7th Math, 8th Math and Algebra 1.				
	Funding Sources: 211 - Title I - SIG (School Improvement Grant) - 1000.00					
6) Provide Targeted and Individualized Tutoring, before, during, and after school, to close gaps in student performance and increase student growth.	Instructional Math Coach	Increase student achievement through afterschool tutoring.				
	Funding Sources: 211 - Title I - SIG (School Improvement Grant) - 2000.00, 199 - State Compensatory PIC 30 - 2400.00					
7) Provide teachers and students resources and supplies to stay organized with instructional guides and data tracking spreadsheets.	Math Instructional Coach	Increase academic achievement in mathematics in 6th, 7th and 8th.				
	Funding Sources: 199 - State Compensatory PIC 30 - 1000.00					
						

Goal 1: Student Achievement: Increase student academic performance in grades 6-8.

Performance Objective 3: SCIENCE

-Increase the percentage of students meeting Approaches Grade Level Performance: APPROACHES performance on STAAR 8th Grade Science from 37% to 55%.





-Increase the percentage of students meeting Meets Grade Level Performance: Increase the MEETS percentages from 21% to 25% on 8th Grade Science STAAR.

-Increase the percentage of students meeting the Masters Grade Level Performance: Increase the MASTERS percentage from 10% to 15% on 8th Grade Science STAAR.

Evaluation Data Source(s) 3: The performance of this objective will be evaluated using 2018-2019 STAAR Scores.

Summative Evaluation 3:

Strategy Description	Monitor	Strategy's Expected Result/Impact	Reviews			
			Formative			Summative
			Nov	Jan	Apr	June
1) Students will utilize research-based, TEKS aligned supplemental product to improve and strengthen science vocabulary and engage in inquiry-based instruction.	Instructional Coach	Increased student achievement results on Unit exams, benchmarks, STAAR and appropriate program assessments.				
	Funding Sources: 211 - Title I - SIG (School Improvement Grant) - 15360.00					
2) Students will engage in interactive conceptual world wall to reinforce and build science vocabulary and comprehension.	District Science Specialist	Increased student achievement results on Unit Assessments, benchmarks, and STAAR.				
3) Students will create a writing component using their interactive notebooks (i.e. CER statements, stem sentences, analogies) that reinforces word wall concepts.	District Science Specialist	Increased student achievement results on CBA, benchmarks, STAAR and Laserfiche reports.				
4) Students will participate in engaging lessons through science labs & will demonstrate concepts through student performance assessments.	District Science Specialist	Increased student achievement results on unit assessments, benchmarks, and STAAR.				
	Funding Sources: 211 - Title I - 105.00					
5) Students will participate in Science, Technology, Engineering, and Mathematics (STEM) connections through Project Based Learning (PBL) that includes problem solving skills with real world applications such as Star Base Kelly and Scobee Challenger Center San Antonio.	District Science Specialist	Increased student achievement results on unit assessments, benchmarks, and STAAR				
	Funding Sources: 199 - Local - 1850.00, 211 - Title I - 4235.00					
6) Receive science intervention support to increase student achievement.	District Science Specialist	Increased student achievement results on unit assessments, benchmarks, STAAR.				
	Funding Sources: 255 - Title II - 7000.00					

Strategy Description	Monitor	Strategy's Expected Result/Impact	Reviews			
			Formative			Summative
			Nov	Jan	Apr	June
7) Provide Math/Science to Increase Community Involvement and Understanding on Math/Science Curriculum	Science and Math Instructional Coaches	Increased community involvement in building a math and science literacy culture				
Funding Sources: 199 - State Compensatory PIC 30 - 0.00						
8) Students will use supplemental aids to improve student achievement in science.	Instructional Coach					
Funding Sources: 211 - Title I - 306.00						
9) Teachers will attend specific professional development or workshops (S3/ Region 20 Stepping up to the STAAR) to gather additional activities aligned to the 8th grade standards.	Instructional Coach					
Funding Sources: 211 - Title I - 0.00						
10) Provide students with manipulatives and materials for collaborative and independent practice when learning concepts and skills.	Instructional Coach	Increase in performance on unit, district, and state assessments.				
Funding Sources: 211 - Title I - 160.00, 199 - State Compensatory PIC 30 - 2500.00						
11) Students will receive laboratory-based experience in order to gain understanding and mastery of science concepts.	Instructional Coach	Increase in student mastery of content and skills will be measured through unit assessments.				
Funding Sources: 211 - Title I - 42400.00						
 = Accomplished  = Continue/Modify  = No Progress  = Discontinue						

Goal 1: Student Achievement: Increase student academic performance in grades 6-8.





Performance Objective 4: SOCIAL STUDIES

- Increase the percentage of students meeting Approaches Grade Level Performance: Approaches performance on STAAR 8th grade Social Studies from 44% to 58%.
- Increase the percentage of students meeting Meets Grade Level Performance: Meets performance on STAAR 8th grade Social Studies from 17% to 20%.
- Increase the percentage of students meeting the Masters Grade Level Performance: Masters performance on STAAR 8th grade Social Studies from 7 to 10%.

Evaluation Data Source(s) 4: The performance of this objective will be evaluated using 2018-2019 STAAR Scores.

Summative Evaluation 4:

Strategy Description	Monitor	Strategy's Expected Result/Impact	Reviews			
			Formative			Summative
			Nov	Jan	Apr	June
Comprehensive Support Strategy Additional Targeted Support Strategy 1) Students will engage in Social Studies instruction designed around process standards by incorporating stimuli, various instructional strategies and identified critical thinking skills	District Social Studies Specialist	Increased student achievement results on common assessments, benchmarks, performance assessments, STAAR, campus walkthroughs and Laserfiche reports.				
	Funding Sources: 199 - State Compensatory PIC 30 - 38000.00					
Comprehensive Support Strategy Additional Targeted Support Strategy 2) Students will analyze primary sources, vocabulary instruction, and other stimuli to build reading, critical thinking, and writing skills to deepen their understanding of history in grades K-12.	District Social Studies Specialist	Increased student achievement results on common assessments, benchmarks, performance assessments, STAAR, interactive notebook samples, campus walkthroughs and Laserfiche reports.				
	Funding Sources: 211 - Title I - 6000.00					
Comprehensive Support Strategy Additional Targeted Support Strategy 3) Students will utilize dual coded STAAR based assessment questions to help increase conceptual understanding of social studies TEKS.	District Social Studies Specialist	Increased student achievement results on common assessments, benchmarks, performance assessments, STAAR, interactive notebook samples, campus walkthroughs and Laserfiche reports.				
	Funding Sources: 199 - State Compensatory PIC 30 - 300.00					

Strategy Description	Monitor	Strategy's Expected Result/Impact	Reviews			
			Formative			Summative
			Nov	Jan	Apr	June
Comprehensive Support Strategy Additional Targeted Support Strategy 4) Student will participate in the analysis of stimuli, discussion, and debate to formulate their own ideas and to write evidence-based arguments.	District Social Studies Specialist	Increased student achievement results on common assessments, benchmarks, performance assessments, STAAR, interactive notebook samples, campus walkthroughs and Laserfiche reports.				
	5) Provide Social Studies/Fine Arts Night to increase civic participation and engagement in local, state, and global community.	Social Studies Instructional Coach ESL Instructional Coach	Increase parental involvement in building civic and community engagement.			
Funding Sources: 211 - Title I - SIG (School Improvement Grant) - 0.00, 211 - Title I - 1750.00						
6) Students will use supplemental aids to improve academic achievement in social studies classrooms.						
Funding Sources: 211 - Title I - 200.00						
7) Students will participate in engaging experiences to understand Social Studies information.	Instructional Coach	Impact retention of concepts and skills, resulting in improved understanding and demonstration of mastery on unit, district, and state assessments.				
	Funding Sources: 211 - Title I - 810.00					
 = Accomplished  = Continue/Modify  = No Progress  = Discontinue						

Goal 1: Student Achievement: Increase student academic performance in grades 6-8.

Performance Objective 5: INSTRUCTIONAL TECHNOLOGY

Student Achievement: Increase digital learning activities and information access to promote collaboration, creativity, innovation and critical thinking.

Evaluation Data Source(s) 5: Technology integrated lessons and technology products.

Summative Evaluation 5:

Strategy Description	Monitor	Strategy's Expected Result/Impact	Reviews			
			Formative			Summative
			Nov	Jan	Apr	June
Comprehensive Support Strategy Additional Targeted Support Strategy 1) Students in 6 - 8 will participate in engaging technology lessons for the purpose of improving reading, math, writing, science and social studies instruction. 5th & 8th grade students will complete their TechApps.	Assistant Principal	Technology products created by students				
	Funding Sources: 410 - Instructional Materials Allotment IMA - 75000.00					
Comprehensive Support Strategy Additional Targeted Support Strategy 2) Students will participate in viable technology lessons that support, extend and enhance the core content area lessons.	Assistant Principal	Technology products created by students				
	Comprehensive Support Strategy Additional Targeted Support Strategy 3) Instructional Coaches will align lessons with classroom instruction in order to bring relevance and real world connections to classroom lessons.	Assistant Principal	Increased number of technology integrated lessons presented to students.			
4) Instructional Coaches will model lessons and/or co teach with classroom teachers to assist in the integration of technology as a learning tool.		Assistant Principal	Classroom Walkthroughs and Co-Teach Lesson Plans			
	5) Students will participate in technology-integrated lessons and data-driven software programs.	Instructional Coaches	Increased number of technology-integrated lessons provided to students and increase data-driven software usage by students.			
Funding Sources: 211 - Title I - SIG (School Improvement Grant) - 1400.00						
6) Students will use the current mode of technology in a math classroom setting including all special population areas.	Math Instructional Coach	Increased number of technology-integrated lessons provided to students and increase access to technology to all special populations.				
	Funding Sources: 211 - Title I - 10000.00					

Strategy Description	Monitor	Strategy's Expected Result/Impact	Reviews			
			Formative			Summative
			Nov	Jan	Apr	June
7) Students will be provided access to technology in order to participate in technology-rich instruction.	Instructional Coaches	Students will have access to technology in order to complete district diagnostic exams and participate in technology-rich lessons and rigorous instruction geared at preparing them for high school, college, and the workplace.				
Funding Sources: 199 - State Compensatory PIC 30 - 39200.00						
8) Provide teachers a document camera technology usage in delivering instruction to all students.	Instructional Coaches	Students will be able to interact with teacher delivery of notes live as well as participate in having student work displayed during instructional time.				
Funding Sources: 199 - State Compensatory PIC 30 - 4000.00						

Goal 1: Student Achievement: Increase student academic performance in grades 6-8.


Performance Objective 6: PHYSICAL EDUCATION


To enhance a students educational well-being by developing their physical and social skills through participation in interscholastic sports, physical education, and instilling life-time sports.


Evaluation Data Source(s) 6: Increased successful student participation in athletic programs.


Summative Evaluation 6:


Strategy Description	Monitor	Strategy's Expected Result/Impact	Reviews			
			Formative			Summative
			Nov	Jan	Apr	June
1) Students will participate in strength, conditioning, agility, and skills building programs.	Campus Coordinator	Measurement chart of student progress				
Funding Sources: 199 - Local - 250000.00						
2) Students will be provided the tools, resources and venues to successfully participate in the athletic program	Campus Coordinator	Monthly evaluations on student progress				
3) Students will be provided athletic equipment and hardware for successful participation in desired sport(s).	Athletic Coach	Improve skill set in each sport				



 = Accomplished

 = Continue/Modify

 = No Progress

 = Discontinue


Goal 1: Student Achievement: Increase student academic performance in grades 6-8.

Performance Objective 7: CAREER & TECHNOLOGY EDUCATION

-Increase Career and Technical Education performance in EOC Algebra I from 76% to 80%.

Evaluation Data Source(s) 7: PBMAS data results

Summative Evaluation 7:

Strategy Description	Monitor	Strategy's Expected Result/Impact	Reviews			
			Formative			Summative
			Nov	Jan	Apr	June
1) Students will explore and understand new CTE TEKS and CTE courses through implementation of new TEKS curriculum.	CTE Director	Increased student achievement results on CBA, benchmarks, STAAR, campus walkthroughs and appropriate program assessments.				
2) CTE teachers will create Student Intervention Folders (SIF) consisting of work samples and student data to monitor student academic progress.	CTE Director	Classroom Walkthroughs, SIF folder check				
3) CTE students will be monitored for progress in their perspective CTE courses BOY, MOY and EOY.	CTE Director	Successful completion of CTE coherent courses and/or CTE certifications.				
4) Teachers will implement differentiated instruction practices to special populations students in the CTE courses.	CTE Director	Campus Walkthroughs				
	Funding Sources: 244 - CTE PIC 22 - 2000.00, 199-CTE PIC 22 - 0.00					
5) High School students will be provided the instruction and the opportunity to test for industry certifications related to their content area. Upon successful completion of content, Certificates of Completion for certain areas of instruction will be awarded.	CTE Director	Number of certifications and certificates of completion				
	Funding Sources: 244 - CTE PIC 22 - 5000.00, 199 - Local - 5000.00					
						

Goal 1: Student Achievement: Increase student academic performance in grades 6-8.

Performance Objective 8: HIGHLY EFFECTIVE INSTRUCTIONAL STAFF and TEACHER RETENTION

Increase the effectiveness of instructional staff and teacher retention.

-Offer and support the implementation of targeted needs-based professional development in accordance with district initiatives to 100%

Evaluation Data Source(s) 8: The performance of this objective will be measured using Eduphoria reports.

Summative Evaluation 8:

Strategy Description	Monitor	Strategy's Expected Result/Impact	Reviews			
			Formative			Summative
			Nov	Jan	Apr	June
1) Provide a three day New Teacher Academy which will familiarize participants with Technology, CHAMPS Classroom Management, Texas Teacher Evaluation and Support System (TTESS) training and a Curriculum Overview.	Staff Development Director	Eduphoria Workshop Reports				
2) Provide a qualified mentor to newly hired teachers with 0-3 years of experience. New Teacher Mentoring program includes Texas Beginning Educator and Support System (TxBESS) training for the mentor and regular mentor and new teacher meetings and new teacher observations of peers.	Staff Development Director	Mentor Training Schedule, Mentor Support Logs, New Teacher Peer Observation Logs, end of the year surveys				
Funding Sources: 255 - Title II - 35000.00						
3) Teachers will use online resources for personal training and professional development and complete their School Technology and Readiness (STaR) survey.	Instructional Technology Specialist	Online assessment reports and technology integration in the classroom as evidenced through CWTs.				
Funding Sources: 199 - Local - 40000.00						
4) CIA Department members will participate in professional development conferences and workshops.		Increased student achievement results on CBA's, benchmarks, STAAR and appropriate program assessments.				
Funding Sources: 199-Bilingual PIC 25 - 3000.00, 211 - Title I - 155000.00						
5) Instructional Technology Facilitators will participate in professional development workshops and conferences.	Instructional Technology Specialist	Student performance on CBA's, benchmarks and STAAR EOC.				
Funding Sources: 199 - Local - 30000.00						
6) Monitor student progress through an online software system.	Principal	Monitored and increased student achievement on CBAs, benchmarks, and STAAR EOC as well as a decrease in Tier 2 and Tier 3 students.				
Funding Sources: 199 - State Compensatory PIC 30 - 30000.00						

Strategy Description	Monitor	Strategy's Expected Result/Impact	Reviews			
			Formative			Summative
			Nov	Jan	Apr	June
7) Provide TIER 1 reference materials for increased capacity and instructional practices.	Instructional Coach	Increase the instructional practice of teachers in order to increase the achievement of students.				
Funding Sources: 211 - Title I - 2400.00						
8) Teachers will track and organize data to increase individualized and targeted instruction.	Instructional Coaches	Through the disaggregation of data, teachers will track and monitor student growth and achievement through targeted instructional practices.				
Funding Sources: 199 - State Compensatory PIC 30 - 200.00						

Goal 1: Student Achievement: Increase student academic performance in grades 6-8.

Performance Objective 9: ATTENDANCE

To increase district-wide student attendance to 95% or higher.

Evaluation Data Source(s) 9: PEIMS reports on student attendance rates

Summative Evaluation 9:

Strategy Description	Monitor	Strategy's Expected Result/Impact	Reviews			
			Formative			Summative
			Nov	Jan	Apr	June
1) Develop parent/student "Attendance Agreement" to promote family accountability and responsibility in increasing attendance.	Director of Pupil Services Department	Review attendance data				

Goal 1: Student Achievement: Increase student academic performance in grades 6-8.

Performance Objective 10: MEASUREMENT & ASSESSMENT

Student Achievement: Implement an assessment program to measure student achievement and provide feedback on instruction.

Evaluation Data Source(s) 10: Compliance reports, assessments and program evaluations

Summative Evaluation 10:

Strategy Description	Monitor	Strategy's Expected Result/Impact	Reviews			
			Formative			Summative
			Nov	Jan	Apr	June
Comprehensive Support Strategy Additional Targeted Support Strategy 1) Students will participate in assessments and benchmarks to monitor student progress in TEKS mastery throughout the year.	District Test Coordinator	Increased student achievement results on assessments and benchmarks.				
Funding Sources: 199 - Local - 48000.00, 199 - State Compensatory PIC 30 - 286000.00						
Comprehensive Support Strategy Additional Targeted Support Strategy 2) Teachers and Instructional Coaches will have the opportunity to develop and review assessments.	Assessment Evaluator	Increase in supplemental duty participants and submitted review forms.				
Funding Sources: 211 - Title I - 20000.00						

Goal 1: Student Achievement: Increase student academic performance in grades 6-8.

Performance Objective 11: COLLEGE and CAREER READY

Secondary Schools: Increase performance on Pr-Scholastic Aptitude Test (PSAT)

Evaluation Data Source(s) 11: The performance of this objective will be evaluated using CollegeBoard Reports

Summative Evaluation 11:

Strategy Description	Monitor	Strategy's Expected Result/Impact	Reviews			
			Formative			Summative
			Nov	Jan	Apr	June
1) Students in 8th-12th grade will take college and career readiness assessments.	District Advanced Academic Specialist and Director of Student Support Services	Student Performance on PSAT, ACT, SAT, TSI and AP exams				
	Funding Sources: 199 - Gifted & Talented PIC 21 - 22000.00, 274 - GEAR UP Grant - 20000.00					
2) Administer college readiness/entrance exams and analyze data to inform instruction.	District Advanced Academic Specialist	Increased student performance on college and career readiness assessments to include PSAT and SAT.				
	Funding Sources: 211 - Title I - 250.00					
3) Provide Gaining Early Awareness and Readiness for Undergraduate Programs (GEAR UP) cohort students support services such as tutoring, counseling/advising and mentoring to ensure that they are academically prepared for college and career readiness	Advanced Academic Specialist	Student performance on CBA and STAAR				
	Funding Sources: 274 - GEAR UP Grant - 40000.00					
4) GEAR UP students will participate in field trips and student conferences	Advanced Academic Specialists	Participation rate of GEAR UP students				
	Funding Sources: 274 - GEAR UP Grant - 38800.00					
5) Provide Pre-Advanced Placement (Pre AP) and Dual Credit (DC) courses.	Advanced Academic Specialists	AP Exams, STAAR Level II student performance				
	Funding Sources: 199 - Local - 59000.00					
6) Students will engage in a variety of literary genres and modes of writing in preparation for future college admission assessments.	District ELAR Specialist	Increased student performance on state assessments (STAAR) and college admissions assessments				
	Funding Sources: 199 - State Compensatory PIC 30 - 3000.00					

Strategy Description	Monitor	Strategy's Expected Result/Impact	Reviews			
			Formative			Summative
			Nov	Jan	Apr	June
7) Students will participate in curricular knowledge in real world situations by participating in extra curricular activities such as: -UIL -Robotics -Chess -Fine Arts -Academic Decathlon -Athletics	CTE Director	Student performance in extra curricular activities as evidenced by increased student performance on STAAR.				
	Funding Sources: 199 - Local - 300000.00					
8) Students will be provided four credit by examination opportunities as required by state mandate.	Director of Student Support Services	Increase number of students receiving credit by exams				
	Funding Sources: 199 - Local - 15000.00					
9) Students from grades 8 through 12 may take the Texas Success Initiative (TSI) assessment in preparation for college readiness and promote entry to dual credit courses.	Director of Student Support Services	Successful completion of TSI and increased enrollment in dual credit courses.				
	Funding Sources: 199 - Local - 7000.00, 199-CTE PIC 22 - 1500.00					
10) Students will participate in college and career readiness events to promote post-secondary education such as, Texas Association of Collegiate Registrars and Admission Officers (TACRAO) college night , financial aid night, Cafe College, and college campus visits	Director of Student Support Services	Increase number of students applying to college				
	Funding Sources: 199 - Local - 3000.00					
11) Provide opportunities for GEAR UP cohort parents to attend college awareness activities.	Advanced Academic Specialist	50% of GEAR UP cohort parents/families attend at least three college awareness activities.				
	Funding Sources: 274 - GEAR UP Grant - 5000.00					
12) 8th Grade Students completion of Choices Explorer or Planner with Bridges. (Career Interest Inventories)	Director of Student Support Services	Increased awareness of college and careers.				
	Funding Sources: 199 - Local - 2500.00					
13) Provide yearlong program opportunities and institutes designed to GEAR UP students work at or above grade level, ease transitions, and increase college & career awareness such as summer camps, educational trips, etc.)	Advanced Academic Specialists	98% of GEAR UP students participate in programs throughout the year 50% of GEAR UP students participate in summer programs and travel opportunities that support GEAR UP program				
	Funding Sources: 274 - GEAR UP Grant - 4500.00					
14) Students and Parents will be provided transition guides to prepare for completion of high school in four years.	Director of Student Support Services	Graduation completion in four years				
	Funding Sources: 211 - Title I - 5000.00					
15) Provide comprehensive tutoring, counseling and/or a mentoring program for the GEAR UP cohort.	Advanced Academic Specialist	90% of GEAR UP cohort participate in tutoring, counseling and or mentoring program.				
	Funding Sources: 274 - GEAR UP Grant - 30000.00					
16) Provide professional development opportunities for the GEAR UP cohort team that will provide support to meet the GEAR UP goals.	Advanced Academic Specialist	staff attendance				
	Funding Sources: 274 - GEAR UP Grant - 22700.00					

Strategy Description	Monitor	Strategy's Expected Result/Impact	Reviews			
			Formative			Summative
			Nov	Jan	Apr	June
17) Utilizing sheltered instruction strategies, the LOTE teachers will implement the new LOTE TEKS emphasizing the modes of communication (interpretive, interpersonal and presentational) through the new adopted instructional materials.	Curriculum Director	Student nine weeks grades and classroom walktroughs				
18) Students will participate in the externally operated after school challenge program providing K-5 students with homework assistance, educational games, and enrichment activities such as fine arts, nutrition, and physical fitness.	Principal	Increased student attendance and academic achievement				
Funding Sources: 211 - Title I - 5455.00						
19) Students will track their learning for the day in order to increase academic achievement.	Principal	Increased student attendance and academic achievement.				
Funding Sources: 211 - Title I - 3000.00						

Goal 2: Organizational Learning and Leadership Development

Performance Objective 1: EFFECTIVE LEADERSHIP

Providing professional development and resources dedicated to building leadership and systems.

Evaluation Data Source(s) 1: State and district assessment data will reflect an increase in State Accountability from a 67 to a 80.

Summative Evaluation 1:

Strategy Description	Monitor	Strategy's Expected Result/Impact	Reviews			
			Formative			Summative
			Nov	Jan	Apr	June
1) Perform Comprehensive Needs Assessment (CNA) and implement campus/district improvement plans to improve student performance.	Instructional Coach	CNA and Campus Improvement Plan (CIP)/ District Improvement Plan (DIP) development				
2) Implement grant programs efficiently and effectively to accomplish program goals/objectives.	Principal	Compliance reports				
Funding Sources: 211 - Title I - 9550.00						
3) Students will participate in hands-on, engaging lessons in all content areas of math, science, ELAR and social studies that include Texas Curriculum Management Program Cooperative (TCMPC), and district supplemental documents as a supplemental resource.	Principal	Increased student performance on curriculum based assessments, STAAR, Kindergarten (K)-1 performance indicators and Envision Diagnostic Tool				
Additional Targeted Support Strategy 4) Implement a Response to Intervention Monitoring Program to ensure Tier II and III students and student groups are monitored.	Assistant Principals & Principal	Increased student achievement results on common assessments, benchmarks, STAAR, and other appropriate program assessments.				
Funding Sources: 199 - State Compensatory PIC 30 - 30000.00						
Comprehensive Support Strategy Additional Targeted Support Strategy 5) Students will participate in summer school acceleration and enrichment activities to prepare them for subsequent grade levels.	Curriculum Coordinator	Meet requirement for promotion for subsequent grade level.				
Funding Sources: 199 - State Compensatory PIC 30 - 625000.00						
Comprehensive Support Strategy Additional Targeted Support Strategy 6) Disseminate information regarding Federal and State Accountability as well as provide in-depth data disaggregation for analysis, predictions, and program effectiveness using evaluation tools for data analysis.	District Coordinator for School Improvement	Increased student achievement, effective program implementation, and meeting state accountability indices.				
Funding Sources: 211 - Title I - 35000.00						

Strategy Description	Monitor	Strategy's Expected Result/Impact	Reviews			
			Formative			Summative
			Nov	Jan	Apr	June
7) Faculty and Staff will attend and/or present at content-based conferences.	Instructional Coach	Increase the content and pedagogical knowledge of teachers, improving instruction for students.				
Funding Sources: 211 - Title I - 300.00						
8) Ensure student safety.	Principal	Ensuring student safety will result in an increase in ability for students to focus on instruction, leading to mastery of content and skills.				
Funding Sources: 199 - State Compensatory PIC 30 - 3600.00						

Goal 2: Organizational Learning and Leadership Development

Performance Objective 2: MONITOR STUDENT PERFORMANCE AND GROWTH

Evaluation Data Source(s) 2: State and district assessment data will reflect an increase in State Accountability from a 67 to a 80.

Summative Evaluation 2:


Strategy Description	Monitor	Strategy's Expected Result/Impact	Reviews			
			Formative			Summative
			Nov	Jan	Apr	June
1) Track student mastery of strategies and skills using the "PEN IN HAND" strategy.	Ashley Balagia	Increase the effectiveness of teacher feedback during independent practice in order to track and target student learning in an individualized pathway.				
Funding Sources: 199 - Local - 100.00						

Goal 2: Organizational Learning and Leadership Development

Performance Objective 3: INCREASE TEACHER CAPACITY IN PEDAGOGY AND CONTENT

Evaluation Data Source(s) 3: State and district assessment data will reflect an increase in State Accountability from a 67 to a 80.

Summative Evaluation 3:

Strategy Description	Monitor	Strategy's Expected Result/Impact	Reviews			
			Formative			Summative
			Nov	Jan	Apr	June
1) Ensure staff members have access to professional reference material.	Instructional Coach	Increased teacher efficacy will yield an increase in student performance.				
Funding Sources: 199 - Local - 350.00						
2) Ensure staff members have access to professional learning community activities that impact their classroom instruction.	Ashley Balagia	Increased teacher capacity will yield an increase in student performance.				
Funding Sources: 199 - Local - 140.00						
3) Ensure staff members have access to professional workshops that build their content and pedagogy.	Principal	Increasing the content knowledge and pedagogical practice of teachers can positively impact student understanding of content and skills, demonstrated on unit, campus, district, and state assessments,				
Funding Sources: 211 - Title I - 1000.00						
						

Goal 3: Exceptional Learners: To improve instructional programs to meet the needs of all exceptional learners.

Performance Objective 1: SPECIAL EDUCATION

Increase the number of Special Education students meeting the STAAR passing standard Phase-in 1 Level II in grades 3 - 8 (PBMAS Indicators)


- Increase Special Education student performance in Reading STAAR (3-5) from 16% to 39%
- Increase Special Education student performance in 4th grade Writing STAAR from 9% to 34%
- Increase Special Education student performance in 7th grade Writing STAAR from 4% to 30%
- Increase Special Education student performance in Science STAAR 5th grade from 18% to 40%
- Increase Special Education student performance in Algebra I EOC from 31% to 53%
- Increase Special Education student performance in Science STAAR (8th) from 8% to 34%
- Increase Special Education student performance in Social Studies STAAR from 2% to 29%
- Increase Special Education student performance in EOC ELA I from 7% to 33%
- Increase Special Education student performance in EOC ELA II from 10% to 35%
- Increase Special Education student performance in Biology from 46% to 59%
- Increase Special Education student performance in EOC Social Studies from 2% to 29%

Evaluation Data Source(s) 1: This objective will be evaluated using 2016-2017 PBMAS results.

Summative Evaluation 1:

Strategy Description	Monitor	Strategy's Expected Result/Impact	Reviews			
			Formative			Summative
			Nov	Jan	Apr	June
1) Students will participate in continuum of services monitored by a special education case manager targeting individual student needs utilizing a variety of a modalities.	Special Education Coordinator	Increased student achievement results on CBA, benchmarks, STAAR and appropriate program assessments.				
2) Students will participate in co-teach classrooms in the areas of ELAR and Math at the secondary level using differentiated instructional strategies and accommodations provided in the general education classroom. This model of instruction will be provided based on student need.	Special Education Specialist	Increased student achievement results on CBA's, benchmarks, STAAR and appropriate program assessments.				

Strategy Description	Monitor	Strategy's Expected Result/Impact	Reviews			
			Formative			Summative
			Nov	Jan	Apr	June
3) Students will attend the Regional Day School for the Deaf as indicated on their Admission, Review and Dismissal (ARD).	Special Education Director	Increased student achievement results on CBA's, benchmarks, STAAR and appropriate program assessments.				
Funding Sources: 224 - Title I - SPED PIC 23 - 31740.00						
4) Students will receive related services as identified by the Admission Review Dismissal Committee (ARDC); services such as: speech therapy, occupational and physical therapy, deaf interpreters, language interpretation, music therapy and psychological assessment.	Special Education Director	Increased student performance on CBA, benchmarks, STAAR, and appropriate program assessments.				
Funding Sources: 199 - Local - 748304.00, 224 - Title I - SPED PIC 23 - 244700.00						
5) Students will engage in differentiated instruction that addresses individual student needs as specified in their Individualized Education Plans (IEPs).	Special Education Instructional Coordinator	Increased student achievement based on IEP report card				
6) Special education teachers will use an electronic web-based program to document ARDs.	Special Education Director	ARD compliance reports				
Funding Sources: 224 - Title I - SPED PIC 23 - 32244.00						
7) Special education department staff members and teachers will participate in professional development sessions to include research based instructional practices and strategies, accommodations, and modifications that address the academic, functional, and behavioral needs of students with disabilities.	Special Education Director	Increased student achievement among students who participate in Special Education				
Funding Sources: 199 - Local - 5000.00, 224 - Title I - SPED PIC 23 - 3100.00						
8) Special education teachers will provide consultation and support to general education teachers in the instruction of students with disabilities.	Special Education Specialists	Increased student achievement results on CBA's, benchmarks, STAAR and appropriate program assessments.				
9) Provide professional development opportunities for paraprofessionals who work with students having academic and/or behavioral difficulties.						
10) Students will engage in differentiated instruction that addresses learning gaps identified through a variety of data sources as analyzed by special education case managers and teachers.	Special Education Coordinator	Increased student achievement results on CBA, benchmarks, STAAR and appropriate program assessments.				
11) Students from the Edgewood Transition Center (ETC) and students in Life Skills participating in Community Based Instruction (CBI) will receive district and city bus transportation services.	Special Education Director	Increased student achievement as a result of student participation in programs.				
Funding Sources: 199 - State Compensatory PIC 30 - 1300.00, 224 - Title I - SPED PIC 23 - 1000.00						
12) Case managers will provide incentives for special education students as they meet learning goals.	Instructional Coach	Increased student achievement as a result of increased student motivation in meeting learning goals.				
Funding Sources: 211 - Title I - 1200.00						

Strategy Description	Monitor	Strategy's Expected Result/Impact	Reviews			
			Formative			Summative
			Nov	Jan	Apr	June
						

Goal 3: Exceptional Learners: To improve instructional programs to meet the needs of all exceptional learners.

Performance Objective 2: APPROACHES


Increase the percentage of English language students (ELL) (6-12) meeting or exceeding their progress measure on STAAR from 59% to 70%.
 Increase the number of English learners students meeting the STAAR passing standard Phase-in 1 Level II in grades 3 - 8 (PBMAS Indicators)

- Increase English learners performance in Reading STAAR (3-5) from 62% to 70%.
- Increase English learners performance in Writing STAAR (3-5) from 70% to 75%
- Increase English learners performance in Social Studies STAAR from 24% to 45%
- Increase English learners performance in Science STAAR (3-5) from 63% to 70%
- Increase English learners performance in Reading STAAR (6-8) from 49% to 61%
- Increase English learners performance in Algebra I (6-8) from 69% to 74%
- Increase English learners performance in Writing STAAR (6-8) from 34% to 51%
- Increase English learners performance in Science STAAR (6-8) from 44% to 58%
- Increase English learners performance in ELA I EOC (9-12) 17% to 40%
- Increase English learners performance in EOC (9-12) ELA II from 10% to 35%
- Decrease TELPAS beginning and intermediate Composite Rating levels for students in U.S. schools multiple years from 32% to 25%.

Evaluation Data Source(s) 2: The performance of this objective will be measured using STAAR Progress measure or ELL progress measure data.

Summative Evaluation 2:

Strategy Description	Monitor	Strategy's Expected Result/Impact	Reviews			
			Formative			Summative
			Nov	Jan	Apr	June
1) English Language Learners (ELL) will participate in sheltered instruction classes and cultural/academic activities to assist with making content comprehensible, develop academic language and increase student achievement and English language proficiency.	ESL Instructional Coach	Increased student achievement results on Unit exams, benchmarks, STAAR, TELPAS and appropriate program assessments.				
	Funding Sources: 263 - Title III Part A - LEP - 289.00, 211 - Title I - 6000.00					
2) Coach secondary school teachers with second language acquisition strategies in order to effectively address the needs of English Language learners.	Bilingual/ESL Specialist	Increased student achievement results on CBA's, benchmarks, STAAR, and TELPAS				
	Funding Sources: 263 - Title III Part A - LEP - 191000.00					
3) Address the linguistic needs of ELL students as determined and documented by the Language Proficiency Assessment Committee.	Bilingual/ESL Director	Increased student performance on STAAR and oral language proficiency growth on Woodcock Munoz and TELPAS				
	Funding Sources: 199-Bilingual PIC 25 - 22125.00					

Strategy Description	Monitor	Strategy's Expected Result/Impact	Reviews			
			Formative			Summative
			Nov	Jan	Apr	June
4) Train teachers in second language acquisition strategies to address the needs of ELLs, such as questioning, integrating language skills (reading, writing, listening and speaking), use of cognates, building academic language, visual tools, response signals, structured conversations, structured reading and writing activities, and others.	Bilingual/ESL Specialist	Increased student achievement results on CBA's, benchmarks, STAAR, TELPAS and appropriate program assessments.				
	Funding Sources: 199-Bilingual PIC 25 - 23475.00					
5) Dual language immersion teachers and bilingual paraprofessionals will participate in training opportunities to promote literacy in both Spanish and English for ELLs and Non-ELLs participating in the program.	Bilingual/ESL Specialist	Increased student achievement results on CBA's, benchmarks, STAAR, Eduphoria reports and appropriate program assessments.				
	Funding Sources: 199-Bilingual PIC 25 - 9375.00					
6) Prek 4 and Kinder English Language Learners (ELL) will participate in a summer bilingual program to develop and enhance biliteracy skills to prepare students for subsequent grade levels.	Bilingual/ESL Director	Increase student achievement using CIRCLE, Istation data and Oral Language Proficiency data (TELPAS and WMLS)				
	Funding Sources: 199-Bilingual PIC 25 - 35845.00					
7) Develop the English Language Proficiency Standards (ELPS) through a focused, targeted and systematic second language acquisition instruction to provide ELLs with the foundation of the English language necessary to support content learning.	Bilingual/ESL Specialist	Increased student language proficiency using WMLS and TELPAS, classroom walkthroughs and lesson plans				
	Funding Sources: 199-Bilingual PIC 25 - 4500.00					
8) Analyze TELPAS data and periodically assess the student's language growth in order to identify students that potentially can meet reclassification criteria which will result in reducing the number of long-term ELLs.	Bilingual/ESL Specialist	Increased student language proficiency level using WMLS, TELPAS and appropriate curriculum assessments.				
	Funding Sources: 199-Bilingual PIC 25 - 4500.00					
						

Goal 3: Exceptional Learners: To improve instructional programs to meet the needs of all exceptional learners.

Performance Objective 3: MIGRANT EDUCATION


Migrant Identification and Recruitment (ID&R) Action Plan. Identify and recruit migrant families residing in the Shared Service Agreement (SSA) and Non Project districts to ensure that migrant students are provided with appropriate educational services, and to ensure that they have the opportunity to meet the same challenging state, content, and student performance standards that all children are expected to meet. Ensure all eligible migrant families residing in the districts are properly identified, recruited, and served in order to provide the supplemental services needed to ensure student success in school.

Evaluation Data Source(s) 3: Provided through Shared Service Arrangement with Region 20.

Summative Evaluation 3:

Strategy Description	Monitor	Strategy's Expected Result/Impact	Reviews			
			Formative			Summative
			Nov	Jan	Apr	June
1) Participate and complete Annual Identification & Recruitment (ID&R) Training and New Generation System (NGS) for recruiters training.	Region XX ESC Migrant Education Program (MEP)	Participation/completion certificate				
	Funding Sources: Region XX Shared Services Agreement - 0.00					
2) Participate in Identification & Recruitment (ID&R) series days offered by ESC.	Region XX ESC	Participation/completion certificate				
	Funding Sources: Region XX Shared Services Agreement - 0.00					
3) New employees attend MSIX training offered by ESC 20.	Region XX ESC	Participation/completion certificate				
	Funding Sources: Region XX Shared Services Agreement - 0.00					
4) Brainstorm and plan recruitment strategies for SSAs and Non Project districts and review roles & responsibilities of recruiters. Timeline: Year Round	Region XX ESC MEP	Increased identification of migrant students; recruiter meeting agendas				
	Funding Sources: Region XX Shared Services Agreement - 0.00					
5) Finalize all forms, documents and logs that will be utilized. Disseminate and train on all forms, documents, and logs, etc.	Region XX ESC MEP	Forms that meet Title I Part C Migrant Compliance Report				
	Funding Sources: Region XX Shared Services Agreement - 0.00					
6) Contact potential/current eligible migrant families based on family survey leads or referrals.	Region XX ESC MEP (Recruiters/SEA/Reviewers)	Recruiter logs and certified letters to parents after three attempts to contact the family; completed COEs, videos				
	Funding Sources: Region XX Shared Services Agreement - 0.00					
7) Conduct community outreach and contact other federal agencies that serve migrant families.	Region XX ESC MEP (Recruiters)	Recruiter logs, agency resource list				
	Funding Sources: Region XX Shared Services Agreement - 0.00					

Strategy Description	Monitor	Strategy's Expected Result/Impact	Reviews			
			Formative			Summative
			Nov	Jan	Apr	June
8) Visit local growers.	Region XX ESC MEP (Recruiters including OSY Recruiters)	Recruiter logs, increase in local growers list				
Funding Sources: Region XX Shared Services Agreement - 0.00						
9) Locate out of school youth including preschool aged children.	Region XX ESC MEP (Recruiters including OSY Recruiter)	Recruiter logs, increase in Out of School Youth (OSY)				
Funding Sources: Region XX Shared Services Agreement - 0.00						
10) Contact current eligible migrant families to determine if new qualifying moves have occurred. Complete new COEs as needed.	Region XX ESC MEP (Recruiters)	Completed COEs and documentation of contact attempts on First Contact Spreadsheet, Unique Student Count Report.				
Funding Sources: Region XX Shared Services Agreement - 0.00						
11) Review Family Surveys for potential eligible students. Follow procedures as outlined in MEP procedural manual.	Region XX ESC MEP staff	Complete COEs for qualifying family surveys.				
Funding Sources: Region XX Shared Services Agreement - 0.00						
12) Recruiter will complete COEs and Supplemental Documentation Form (SDF) for all families with a new Qualifying Arrival Data (QAD) and submit to Eligibility Reviewer.	Region XX ESC MEP (Recruiters/SEA/Reviewers)	Completed COE and SDF for all families having a new QAD				
Funding Sources: Region XX Shared Services Agreement - 0.00						
13) Review COEs and SDF for all families with a new QADs after June 1, 2015 to ensure documentation to support all four critical components is included.	Region XX ESC MEP (Recruiters, SEA Reviewer, System Specialist)	All children enrolled into NGS have been properly verified.				
Funding Sources: Region XX Shared Services Agreement - 0.00						
14) Conduct Residency Verification to verify continued residency for all currently eligible children who have not made a new qualifying move during the current reporting period.	Region XX ESC MEP (Recruiters, System Specialist, Ed Spec)	Monthly Residency Verification Report				
Funding Sources: Region XX Shared Services Agreement - 0.00						
15) Network with agencies that serve migrant families. Coordinate/network with local/regional organizations that provide services to migrant workers and their families by meeting with staff.	Region XX ESC MEP (OSY Recruiter/Recruiters/Ed Spec Counselor)	Community Outreach Fair passports to visit agencies who provide services. Sign-in sheets from agencies attending events.				
16) Share and exchange information with parents, students, and district staff regarding High School Equivalency Program (HEP) and College Assistance Migrant Program (CAMP) sites and Teaching and Mentoring Communities (TMC).	Region XX ESC MEP staff	Increase in services provided to migrant high school students by community organizations. Referrals.				
Funding Sources: Region XX Shared Services Agreement - 0.00						

Strategy Description	Monitor	Strategy's Expected Result/Impact	Reviews			
			Formative			Summative
			Nov	Jan	Apr	June
17) Follow protocol for COEs that warrant further review by TEA as outlined in the ID & R Manual.	Region XX ESC MEP (Ed spec)	Compliance with TEA requirements				
Funding Sources: Region XX Shared Services Agreement - 0.00						
18) Provide ID&R awareness and support to SSA MEP staff as specific needs are observed throughout the year.	Region XX ESC MEP (Ed Spec)	Sign-in sheets from SSA contact meeting and MEP program overviews.				
Funding Sources: Region XX Shared Services Agreement - 0.00						
19) Maintain updated active and inactive records. File COEs in alphabetical order by current mother's last name and retain records for seven years from the date eligibility ends.	Region XX ESC MEP staff	Compliance with Records Retention policies by April 30				
Funding Sources: Region XX Shared Services Agreement - 0.00						
20) Validate eligibility through re-interview process according to instructions set forth by TEA.	Region XX ESC MEP staff	100% accuracy rate				
Funding Sources: Region XX Shared Services Agreement - 0.00						
21) Gather and analyze data and input from various MEP stakeholders to incorporate appropriate changes in subsequent ID&R plan for continuous improvement.	Region XX ESC MEP	Identified strengths and weaknesses to redesign the services provided by ESC-20 MEP.				
Funding Sources: Region XX Shared Services Agreement - 0.00						
						

Goal 3: Exceptional Learners: To improve instructional programs to meet the needs of all exceptional learners.

Performance Objective 4: MIGRANT EDUCATION


Ensure that identified Priority for Service (PFS) migrant students have the same opportunity to meet the challenging state, content, and student performance standards expected of all children. 100% of Priority for Service (PFS) migrant students will receive priority access to supplemental instructional and support opportunities.

Evaluation Data Source(s) 4: Provided through shared service arrangement with Region 20

Summative Evaluation 4:

Strategy Description	Monitor	Strategy's Expected Result/Impact	Reviews			
			Formative			Summative
			Nov	Jan	Apr	June
1) Monthly New Generation System (NGS) Priority for Service (PFS) reports to identify migrant children and youth who require priority access to MEP services.	Region XX ESC MEP (System Specialists)	NGS Monthly Reports				
Funding Sources: Region XX Shared Services Agreement - 0.00						
2) Provide Shared Service Agreement (SSA) migrant contacts a copy of the PFS criteria, monthly updated NGS PFS reports, and expectation of procedures to follow with PFS students.	Region XX ESC MEP (Ed Spec Supervisors, System Specialists) District Designee	Emails to district contacts with PFS Reports				
Funding Sources: Region XX Shared Services Agreement - 0.00						
3) Provide all migrant parents a copy of the PFS criteria, what it means, and implications for the student to ensure awareness.	Region XX ESC MEP (Ed Spec Supervisors, Recruiters)	PFS Criteria letter, sign-in sheets from Community Outreach, recruiter logs				
Funding Sources: Region XX Shared Services Agreement - 0.00						
4) Provide parents of PFS students with the knowledge of local and state requirements for promotion, graduation and post-secondary opportunities	Region XX ESC MEP team (migrant tutors, campus designee)	Counselor follow-up, student feedback, agendas, sign-in sheets; tutor timesheets				
Funding Sources: Region XX Shared Services Agreement - 0.00						
5) Provide parents of PFS students an update on the academic progress of their child.	Region XX ESC MEP (Ed Spec Supervisors, Tutors) campus admin, or campus designee	Parent evaluations/feedback, counselor follow-up, phone logs, email documentation, mail out list				
Funding Sources: Region XX Shared Services Agreement - 0.00						

Strategy Description	Monitor	Strategy's Expected Result/Impact	Reviews			
			Formative			Summative
			Nov	Jan	Apr	June
6) Provide parents of PFS students information about available community and /or social services.	Region XX ESC MEP (Ed Spec Supervisors, recruiters, tutors) District designee	Parent evaluations/feedback, counselor follow-up, tutor feedback, student feedback				
Funding Sources: Region XX Shared Services Agreement - 0.00						
7) Develop a set of written procedures that outline a variety of strategies for migrant students with late entry and/or early withdrawal and saved course slots in elective and core subject areas.	Region XX ESC MEP (Ed Spec) District contact or appropriate designee	Written procedures from a group of SSA districts				
8) Collect and analyze sources of student data (transcripts, testing data) to determine progress toward graduation.	Region XX ESC MEP (Counselor, Ed Spec Supervisor, System Specialists, Migrant tutors)	Increased number of students completing credits and/or passing state assessments. Not on time for graduation report.				
Funding Sources: Region XX Shared Services Agreement - 0.00						
9) Provide appropriate placement/programs for students not meeting the state content standards or mastering TEKS objectives. Ex: tutoring, state assessments, remediation, online migrant course work, credit recovery (Nova Net, Plato, FLEX, night school, etc.), summer school, or community resources/services.	Region XX ESC MEP Team (Ed Spec, Ed Spec Supervisor, ESC Counselor, District designee)	Increased number of students completing partial credit and/or passing state assessments. Partial credit report, retention report, formal/informal assessment.				
Funding Sources: Region XX Shared Services Agreement - 0.00						
10) Coordinate with Region 20 Migrant Education Program staff to provide resources and tools to promote student academic success.	Region XX ESC MEP (Ed Spec, Ed Spec Supervisor, migrant tutors, recruiters, ESC counselors)	NGS supplemental count report				
Funding Sources: Region XX Shared Services Agreement - 0.00						
11) Identify dropout students/out-of-school youth (OSY) and provide information regarding options for obtaining diploma/GED.	Region XX ESC MEP (OSY Recruiter, Ed Spec Supervisor), District designee	Identify and provide information regarding options to 100% of OSY students. Supplemental report, OSY Report, Student Termination Report				
Funding Sources: Region XX Shared Services Agreement - 0.00						
12) Identify state, federal and local programs that serve PFS students during the current school year in order to ensure migrant services are supplemental.	Region XX ESC MEP (Ed Spec Supervisor), District designee	Completed documentation for supplemental tutoring form from each SSA district on file (or district version).				
Funding Sources: Region XX Shared Services Agreement - 0.00						

Strategy Description	Monitor	Strategy's Expected Result/Impact	Reviews			
			Formative			Summative
			Nov	Jan	Apr	June
13) Provide opportunities for campus counselors to participate in the Migrant Counselor Overview session to analyze migrant student educational needs.	Region XX ESC MEP counselor	Increase the number of participants to this session by 100%. Sign-in sheets from overviews provided.				
Funding Sources: Region XX Shared Services Agreement - 0.00						
14) Provide on-line and face to face opportunities for district/campus staff to attend staff development for enhancing their knowledge of the migrant student population including migrant student needs. Videos, Face to Face overviews.	Region XX ESC MEP (Ed Spec Supervisor, ESC Counselor)	Increase the number of participants at the ESC sessions/contact meetings by 100%. Participant evaluations, participant feedback, sign-in sheets.				
Funding Sources: Region XX Shared Services Agreement - 0.00						
15) Provide district contacts with Priority for Services criteria and a copy of the PFS action plan to be included in their District Improvement Plan (DIP).	Region ESC MEP (Ed Spec Supervisors), District designee	Copy of DIP showing insertion of PFS Action Plan				
Funding Sources: Region XX Shared Services Agreement - 0.00						
						


Goal 3: Exceptional Learners: To improve instructional programs to meet the needs of all exceptional learners.

Performance Objective 5: MASTERS

Increase advanced Level III student performance with Gifted and Talented students in 6th through 8th grade Reading from 31% to 50%.

Evaluation Data Source(s) 5: Advanced Level III STAAR performance

Summative Evaluation 5:

Strategy Description	Monitor	Strategy's Expected Result/Impact	Reviews			
			Formative			Summative
			Nov	Jan	Apr	June
1) Engage in professional development in the area of Gifted and Talented (GT) and advanced instructional strategies.	Advanced Academic Specialists	Increased student performance on AP exams				
	Funding Sources: 199 - Gifted & Talented PIC 21 - 35000.00, 274 - GEAR UP Grant - 2100.00					
2) District Elementary GT students will be offered a GT curriculum that includes the GT Texas Performance Standards.	District GT Teacher	Project completion for every GT student				
	Funding Sources: 199 - Gifted & Talented PIC 21 - 60000.00					
3) Provide testing materials for GT identification.	District Advanced Academic Specialist	Increased student performance on advanced level assessments to include PSAT, SAT and ACT				
	Funding Sources: 199 - Gifted & Talented PIC 21 - 15000.00					
4) Provide parents GT informational sessions	Advanced Academic Specialist	Increased student achievement results on CBA's, benchmarks, STAAR and appropriate program assessments.				
	Funding Sources: 199 - Gifted & Talented PIC 21 - 9000.00					
						

Goal 4: Student Support Services: To provide a well-rounded education to increase student achievement.

Performance Objective 1: GUIDANCE PROGRAM

To provide proactive developmental guidance program that addresses responsive services that supports social and emotional well-being of students, parents and staff.

Evaluation Data Source(s) 1: Increased academic achievement and graduation rate

Summative Evaluation 1:

Strategy Description	Monitor	Strategy's Expected Result/Impact	Reviews			
			Formative			Summative
			Nov	Jan	Apr	June
1) Social workers will utilize curriculum and work with student groups to build social skills, increase morale, on campus and encourage community service opportunities completed by students e.g. Random Acts of Kindness	Director of Student Support Services	Decrease in the number of discipline referrals				
2) Counselors and Social Workers will organize events to promote positive family relationships. e.g. Daughter's Hero Banquet, Mother's Day out	Director of Student Support Services	Positive survey results				
Funding Sources: 199 - Local - 1800.00						
3) Provide guidance content in a systematic way to all students to address the immediate concerns of students for the purpose of prevention and intervention and to assist students to monitor and understand their own development. Services areas will be addressed through the four components: GUIDANCE CURRICULUM, RESPONSIVE SERVICES, INDIVIDUAL PLANNING, and SYSTEM SUPPORT.	Director of Student Support Services	Increased number of guidance lessons. Decreased number of discipline referrals. Increased in student Attendance. Students will gain self-knowledge and awareness of personal/social development.				
4) Students will participate in Human Sexuality Education related to sexually transmitted diseases, human immunodeficiency virus, and abstinence as preferred choice of behavior in relationship to all sexual activity.	Director of Student Support Services	Increase four year graduation rate and reduce dropout rate				
5) Identify homeless students and coordinate support services to ensure that homeless students are present at school.	School Age Parent/Homeless Specialist	Increased attendance rate for homeless student population				
6) Implementation of anti-bullying comprehensive curriculum in K-12 classrooms	Director of Student Support Services	Decreased number of bullying incidents				

Strategy Description	Monitor	Strategy's Expected Result/Impact	Reviews			
			Formative			Summative
			Nov	Jan	Apr	June
7) Counselors and Social Workers will provide training on anti-bullying prevention, policy and procedures to students, staff and parents	Director of Student Support Services	Positive survey results and reduced bullying incidents				
8) Childsafe will provide required training on child and sex abuse reporting policies to all staff members	Director of Student Support Services	Childsafe reports				
9) Counselors and Social Workers will provide training on suicide prevention, policy and procedures to students, staff and parents.	Director of Student Support Services	Student Support Service log				



= Accomplished



= Continue/Modify



= No Progress



= Discontinue

Goal 4: Student Support Services: To provide a well-rounded education to increase student achievement.

Performance Objective 2: HEALTH SERVICES

Decrease the number of students whose health screenings go unaddressed to fewer than 6.8% for vision, and fewer than 1.6% for hearing.

Evaluation Data Source(s) 2: The performance of this objective will be evaluated using reports from the Child Health Reporting System.

Summative Evaluation 2:

Strategy Description	Monitor	Strategy's Expected Result/Impact	Reviews			
			Formative			Summative
			Nov	Jan	Apr	June
1) Collaborate with the School Health Advisory Council (SHAC) to address the district-wide health needs of students.	Director of Health Services/Wellness	Review of SHAC minutes, sign-in sheets and agendas from quarterly meetings				
2) Connect with parents of students who are uninsured to resources providing assistance for the identified needs(s).	Director of Health Services/Wellness	Students' electronic medical records				

Goal 5: Family/Community Engagement: Build respectful and trustful partnerships with parents and families to improve students' academic success.

Performance Objective 1: PARENTAL and COMMUNITY INVOLVEMENT

Increase the number of parents involved in their children's school by 10%.

Evaluation Data Source(s) 1: The performance of this objective will be evaluated by attendance numbers of parents participating in meetings and events.

Summative Evaluation 1:

Strategy Description	Monitor	Strategy's Expected Result/Impact	Reviews			
			Formative			Summative
			Nov	Jan	Apr	June
1) Implement the US Department of Education (USDE) Capacity-Building Framework parental engagement department.	Parent Engagement Coordinator	sign-in documentation data showing attendance trends at parental involvement activities				
Funding Sources: 211 - Title I - 0.00						
2) Parents Liaison will keep web pages updated weekly and monthly newsletters with new information, relevant dates and monthly projects	Parent Engagement Coordinator	Distribution of Campus Parental Involvement website URL links, usage statistics, and the availability of computer labs for parent use.				
3) Provide parent information sessions to include House Bill 5 updates and graduation requirements, topics of interest, PTA Summit, 4 Year Plans , Parent Family Advisory Committee (PFAC) meetings, etc.	Director of Student Support Services	Increase in parent attendance for meetings and Increase completion of 4 Year Plans.				
Funding Sources: 199 - Local - 11700.00						
4) Work with GEAR UP teams at both high schools to meet GEAR UP goals for Parent participation to attend any event 75%, Parents to attend three or more events goal is 50%.	Parent Engagement Coordinator	Sign in documentation and GEAR UP ASPR report				
5) Involve parents in the creation of the Title I Parent Involvement Policy, Compact and a Parent Engagement brochure that includes services and resources for parents.	Parent Engagement Coordinator	Increase in Parental Involvement				
Funding Sources: 211 - Title I - 3000.00						
6) Parent Liaisons will promote the Parent Portal to parents in order to monitor their child's progress.	Parent Engagement Coordinator	Number of parents using Parents Portal.				
7) Collaborate with District Curriculum Specialists to conduct workshops for parents on how to demonstrate strategies and skills for standard mastery, provide information on assessment programs and how to address the specific needs of special populations.	Parent Engagement Coordinator	Parent Questionnaire and Sign In Sheets				

Strategy Description	Monitor	Strategy's Expected Result/Impact	Reviews			
			Formative			Summative
			Nov	Jan	Apr	June
8) Ready Rosie will be utilized by parent to increase their understanding of Literacy Readiness Activities.	Early Childhood Specialist	Increase in the utilization of software.				
9) Provide a Parent Resource Center at the Family Service Center. Computers will be provided for parents to utilize to help search for jobs or research college and career information for themselves or their child. College information will be provided for the center.	Parent Engagement Coordinator	Increase in Parental Involvement and Sign-In Sheets.				
	Funding Sources: 211 - Title I - 5000.00					

Comprehensive Support Strategies

Goal	Objective	Strategy	Description
1	1	1	Provide staff development for Dyslexia teachers to identify and service students in the Dyslexia Program.
1	2	1	Students will use mathematical processes to acquire and demonstrate a district problem solving model that incorporates analyzing, planning, solving, and justifying/evaluating.
1	2	2	Students will use internet-based instructional materials on a variety of platforms to increase learning and achievement in the math classroom.
1	4	1	Students will engage in Social Studies instruction designed around process standards by incorporating stimuli, various instructional strategies and identified critical thinking skills
1	4	2	Students will analyze primary sources, vocabulary instruction, and other stimuli to build reading, critical thinking, and writing skills to deepen their understanding of history in grades K-12.
1	4	3	Students will utilize dual coded STAAR based assessment questions to help increase conceptual understanding of social studies TEKS.
1	4	4	Student will participate in the analysis of stimuli, discussion, and debate to formulate their own ideas and to write evidence-based arguments.
1	5	1	Students in 6 - 8 will participate in engaging technology lessons for the purpose of improving reading, math, writing, science and social studies instruction. 5th & 8th grade students will complete their TechApps.
1	5	2	Students will participate in viable technology lessons that support, extend and enhance the core content area lessons.
1	5	3	Instructional Coaches will align lessons with classroom instruction in order to bring relevance and real world connections to classroom lessons.
1	10	1	Students will participate in assessments and benchmarks to monitor student progress in TEKS mastery throughout the year.
1	10	2	Teachers and Instructional Coaches will have the opportunity to develop and review assessments.
2	1	5	Students will participate in summer school acceleration and enrichment activities to prepare them for subsequent grade levels.
2	1	6	Disseminate information regarding Federal and State Accountability as well as provide in-depth data disaggregation for analysis, predictions, and program effectiveness using evaluation tools for data analysis.

Edgewood Independent School District

J.F. Kennedy High School

2019-2020

Accountability Rating: C

Distinction Designations:

Academic Achievement in English Language Arts/Reading

Academic Achievement in Mathematics

Academic Achievement in Social Studies

Postsecondary Readiness



Mission Statement

To educate inner city students such that they maximize their potential, realize their dreams, compete globally and contribute productively to the community

Vision

Preparing students for success in life. Kennedy Strong!

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Goals

Goal 1: Student Achievement: Improve academic outcomes and prepare students to be college and career ready.


Performance Objective 1: READING/WRITING







- Increase the percentage of students Approaching Grade Level Performance on STAAR English I End of Course from 53% to 63% and English II End of Course from 48% to 58%.
- Increase the percentage of student Meets Grade Level Performance on STAAR English I End of Course from 28% to 38% and STAAR English II End of Course from 24% to 34%.
- Increase the percentage of student Masters Grade Level Performance on STAAR English I End of Course from 2% to 10% and STAAR English II End of Course from 1% to 10%.

Evaluation Data Source(s) 1: The performance of this objective will be evaluated using 2019-2020 STAAR Scores.

Summative Evaluation 1:

Targeted or ESF High Priority

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
Comprehensive Support Strategy Additional Targeted Support Strategy TEA Priorities Build a foundation of reading and math 1) Students will engage in vertically aligned lessons to include vocabulary development with depth and complexity based on intensive grade level planning that utilizes supplemental resources, and research based strategies.	2.4, 2.5, 2.6	ELAR Instructional Coach and Assistant Principal	Increased student performance on Unit Assessments, Benchmarks, and STAAR	 20%			
Problem Statements: Student Academic Achievement 1							

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
Comprehensive Support Strategy TEA Priorities Build a foundation of reading and math 2) Students will apply research based comprehension and writing strategies that ensure reading TEKS objectives are met with appropriate depth and complexity to purposefully advance understanding, comprehension and critical thinking in relation to literary texts.		ELAR Instructional Coach and Assistant Principal	Increased student achievement results on Unit Assessment, benchmarks, STAAR and appropriate program assessments.				
	Problem Statements: Student Academic Achievement 1						
Additional Targeted Support Strategy TEA Priorities Build a foundation of reading and math 3) All students will use a Reading and Writing process in their core area and elective classes in order to address critical concerns in reading and writing across the curriculum.		ELAR Coach and Assistant Principal	Increased student performance on Unit Assessments, benchmarks, STAAR, as well as lesson plans.				
	Problem Statements: Student Academic Achievement 1						
 = Accomplished  = Continue/Modify  = No Progress  = Discontinue							

Performance Objective 1 Problem Statements:

Student Academic Achievement
Problem Statement 1: Students performance continues to decrease in English I and II

Goal 1: Student Achievement: Improve academic outcomes and prepare students to be college and career ready.

Performance Objective 2: SOCIAL STUDIES

- Increase the percentage of students Approaching Grade Level Performance on STAAR U.S. History End of Course from 91% to 95%.
- Increase the percentage of students Meeting Grade Level Performance on STAAR U.S. History End of Course from 65% to 70%.
- Increase the percentage of students Mastering Grade Level Performance on STAAR U.S. History End of Course from 30% to 35%.

Evaluation Data Source(s) 2: The performance of this objective will be evaluated using 2019-2020 STAAR Scores.

Summative Evaluation 2:

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
Comprehensive Support Strategy TEA Priorities Connect high school to career and college 1) Students will engage in Social Studies instruction designed around process standards by incorporating stimuli, various instructional strategies and identified critical thinking skills.		AP Social Studies Instructional Coach and Assistant Principal	Increased student achievement results on Unit Exams, benchmarks, EOCs and other appropriate assessments.				
	Problem Statements: School Processes & Programs 1						
TEA Priorities Build a foundation of reading and math 2) Students will analyze primary sources and other stimuli to build reading, critical thinking and writing skills to deepen their understanding of history in grades 9-12.		AP Social Studies Instructional Coach and Assistant Principal	Increased student achievement results on Unit Exams, benchmarks, EOCs and other appropriate assessments.				
	Problem Statements: Student Academic Achievement 1						
TEA Priorities Connect high school to career and college 3) Students will participate in strategies for direct vocabulary instruction involving content and academic terminology in Social Studies grades 9-12.		AP Social Studies Instructional Coach and Assistant Principal	Increased student achievement results on Unit Exams, benchmarks, EOCs and other appropriate assessments.				
	Problem Statements: School Processes & Programs 1						
= Accomplished = Continue/Modify = No Progress = Discontinue							

Performance Objective 2 Problem Statements:

Student Academic Achievement

Problem Statement 1: Students performance continues to decrease in English I and II
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School Processes & Programs
--

Problem Statement 1: Advance academic programs are not aligned for student success.
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Goal 1: Student Achievement: Improve academic outcomes and prepare students to be college and career ready.

Performance Objective 3: MATHEMATICS

- Increase the percentage of students Approaching Grade Level Performance on STAAR Algebra I from 67% to 77%.
- Increase the percentage of students Meeting Grade Level Performance on STAAR Algebra I from 30% to 40%.
- Increase the percentage of students Mastering Grade Level Performance on STAAR Algebra I from 14% to 20%.

Evaluation Data Source(s) 3: The performance of this objective will be evaluated using 2019-2020 STAAR Scores

Summative Evaluation 3:

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
Comprehensive Support Strategy TEA Priorities Build a foundation of reading and math Connect high school to career and college 1) Students will participate in hands on activities to create engaging experiences.		Math Coach and Principal	Increased performance on Unit Assessments, Benchmark, STAAR, PSAT,SAT,TSI				
	Problem Statements: School Processes & Programs 1						
Comprehensive Support Strategy TEA Priorities Build a foundation of reading and math Connect high school to career and college 2) Students will engage in productive struggle via low-floor, high-ceiling problems to enhance their critical thinking and problem solving skills.		Math Coach and Principal	Increased performance on Unit Assessments, Benchmark, STAAR, PSAT,SAT,TSI				
	Problem Statements: School Processes & Programs 1						

Performance Objective 3 Problem Statements:

School Processes & Programs
Problem Statement 1: Advance academic programs are not aligned for student success.





Goal 1: Student Achievement: Improve academic outcomes and prepare students to be college and career ready.

Performance Objective 4: SCIENCE

- Increase the percentage of students Approaching Grade Level on STAAR Biology EOC from 75% to 85%.
- Increase the percentage of students Meeting Grade Level on STAAR Biology EOC from 37% to 47%.
- Increase the percentage of students Mastering Grade Level on STAAR Biology EOC from 4% to 10%.

Evaluation Data Source(s) 4: The performance of this objective will be evaluated using 2018-2019 STAAR Scores.

Summative Evaluation 4:

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
TEA Priorities Connect high school to career and college 1) 2. Students will engage in TEKS based lessons that include research based strategies that include movement and academic language discourse.		AP Science Coach and Vice Principal	Increased student achievement results on Unit Assessment, benchmarks, STAAR, appropriate program assessments.				
	Problem Statements: School Processes & Programs 1						
2) Students will participate in engaging hands on and wet laboratory investigations embedding processing skills including use of equipment, data collection, analyzing, inferring and forming conclusions.		Science Coach and Assistant Principal	Increased student achievement results on Unit Assessments, benchmarks, STAAR and appropriate program assessments.				
Comprehensive Support Strategy TEA Priorities Connect high school to career and college 3) Students will use interactive notebooks to organize, process and reference content knowledge including vocabulary and labeled stimuli		AP Science Coach and Vice Principal	Increased student achievement results on Unit Assessments, benchmarks, STAAR and appropriate program assessments.				
	Problem Statements: School Processes & Programs 1						
TEA Priorities Connect high school to career and college 4) Students will participate in critical writing strategies - Claims, Evidence and Reasoning - that is specific to Science, while improving the overall ELAR performance.		AP Science Coach and Vice Principal	Increased student achievement results on Unit Assessments, benchmarks, STAAR and appropriate program assessments				
	Problem Statements: School Processes & Programs 1						
<div style="display: flex; justify-content: space-around; align-items: center;"> <div style="text-align: center;">  <p>= Accomplished</p> </div> <div style="text-align: center;">  <p>= Continue/Modify</p> </div> <div style="text-align: center;">  <p>= No Progress</p> </div> <div style="text-align: center;">  <p>= Discontinue</p> </div> </div>							

Performance Objective 4 Problem Statements:

School Processes & Programs
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Problem Statement 1: Advance academic programs are not aligned for student success.
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Goal 1: Student Achievement: Improve academic outcomes and prepare students to be college and career ready.

Performance Objective 5: INSTRUCTIONAL TECHNOLOGY

To increase digital learning activities and information access to promote collaboration, creativity, innovation and critical thinking.

Evaluation Data Source(s) 5: Technology integrated lessons and technology products.

Summative Evaluation 5:

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
Comprehensive Support Strategy TEA Priorities Connect high school to career and college 1) Students will participate in viable technology lessons that support, extend and enhance the core content area lessons, in order to bring relevance and real world connections to classroom lessons.		Assistant Principal	Technology products created by students and teacher lesson plans				
	Problem Statements: Demographics 1 Funding Sources: 211 - Title I - 43967.97						
 = Accomplished  = Continue/Modify  = No Progress  = Discontinue							

Performance Objective 5 Problem Statements:

Demographics
Problem Statement 1: Our ADA continues to decrease from 89.9% in 2017- 2018 to 89.4% year to date. Root Cause 1: Students are not engaged in relevant learning.






Goal 1: Student Achievement: Improve academic outcomes and prepare students to be college and career ready.

Performance Objective 6: PHYSICAL EDUCATION

To enhance a students educational well-being by developing their physical and social skills through participation in interscholastic sports, physical education, and instilling life-time sports.

Evaluation Data Source(s) 6: Increased successful student participation in athletic programs.

Summative Evaluation 6:

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
1) Students will participate in strength, conditioning, agility, and skills building programs.		Campus Coordinator	Measurement chart of student progress				
 = Accomplished  = Continue/Modify  = No Progress  = Discontinue							

Goal 1: Student Achievement: Improve academic outcomes and prepare students to be college and career ready.

Performance Objective 7: HIGHLY EFFECTIVE INSTRUCTIONAL STAFF and TEACHER RETENTION


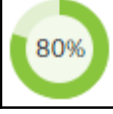


-Increase the effectiveness of instructional staff

-Decrease the percentage of teacher turn over rate

-Offer and support the implementation of targeted needs-based professional development in accordance with district initiatives to 100%

Evaluation Data Source(s) 7: The performance of this objective will be measured using Eduphoria reports.

Summative Evaluation 7:

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
Comprehensive Support Strategy TEA Priorities Recruit, support, retain teachers and principals 1) Increase expertise in TEKS through development of supplemental materials, assessment, data analysis, curriculum review.		ELAR Coach and Assistant Principal	Increased student performance on curriculum based assessment and STAAR				
	Problem Statements: Perceptions 1 Funding Sources: 199 - Local - 12000.00						
TEA Priorities Recruit, support, retain teachers and principals 2) Teachers will participate in staff development sessions to advance improvement in education and target campus needs with a focus on depth and complexity for school improvement through research-based practices.		Assistant Principal	Increased research based strategies that target school improvement and student success				
	Problem Statements: Demographics 1 - Student Academic Achievement 1 - School Processes & Programs 1, 2, 3, 4 - Perceptions 1 Funding Sources: 199 - Local - 50.00						
Comprehensive Support Strategy TEA Priorities Recruit, support, retain teachers and principals 3) The campus will to provide a qualified mentor to newly hired teachers with 0-3 years of experience.		Principal	Mentor Training Schedule, Mentor Support Logs, New Teacher Peer Observation Logs, end of the year surveys				
	Problem Statements: Perceptions 1						
Comprehensive Support Strategy TEA Priorities Recruit, support, retain teachers and principals 4) All teachers will participate in EDGE meetings to develop Thinking Classrooms through quality questioning.		ELAR Instructional Coach and Assistant Principal	Increased student achievement results on Unit Assessments, benchmarks, STAAR and appropriate program assessments.				
	Problem Statements: Perceptions 1 Funding Sources: 199 - Local - 1000.00						

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June

Performance Objective 7 Problem Statements:

Demographics
Problem Statement 1: Our ADA continues to decrease from 89.9% in 2017- 2018 to 89.4% year to date. Root Cause 1: Students are not engaged in relevant learning.
Student Academic Achievement
Problem Statement 1: Students performance continues to decrease in English I and II
School Processes & Programs
Problem Statement 1: Advance academic programs are not aligned for student success.
Problem Statement 2: Our Special Education Program is not meeting the academic needs of our students.
Problem Statement 3: Our ESL Program is not meeting the academic needs for our students.
Problem Statement 4: A systemic Intervention process is needed to fill in achievement gaps.
Perceptions
Problem Statement 1: In 2017-2018 there was a 25% teacher turn over rate.

Goal 1: Student Achievement: Improve academic outcomes and prepare students to be college and career ready.

Performance Objective 8: MEASUREMENT & ASSESSMENT

Implement an assessment program to measure student achievement and provide feedback on instruction.

Evaluation Data Source(s) 8: Compliance reports, assessments and program evaluations

Summative Evaluation 8:

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
Comprehensive Support Strategy TEA Priorities Recruit, support, retain teachers and principals Connect high school to career and college 1) Students will participate in curriculum based assessments and benchmarks to monitor student progress in TEKS mastery throughout the year.		Principal, ELAR Coaches, and Assistant Principal	Increased student achievement results on Unit Assessments, benchmarks, STAAR and appropriate program assessments.				
	Problem Statements: Student Academic Achievement 1, 2 - School Processes & Programs 1, 2, 3, 4 - Perceptions 1						
TEA Priorities Recruit, support, retain teachers and principals Build a foundation of reading and math Connect high school to career and college 2) Teachers will analyze formative and summative data and monitor students' progress and growth, to create data driven decisions.		Principal, ELAR Coaches, and Assistant Principal	Classroom walkthroughs, improved student performance.				
	Problem Statements: Demographics 1 - Student Academic Achievement 1, 2 - School Processes & Programs 1, 2, 3, 4 - Perceptions 1						
= Accomplished = Continue/Modify = No Progress = Discontinue							

Performance Objective 8 Problem Statements:

Demographics
Problem Statement 1: Our ADA continues to decrease from 89.9% in 2017- 2018 to 89.4% year to date. Root Cause 1: Students are not engaged in relevant learning.
Student Academic Achievement
Problem Statement 1: Students performance continues to decrease in English I and II

Student Academic Achievement

Problem Statement 2: Student performance continues to decrease in Algebra I.

School Processes & Programs
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Problem Statement 1: Advance academic programs are not aligned for student success.
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Problem Statement 2: Our Special Education Program is not meeting the academic needs of our students.
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Problem Statement 3: Our ESL Program is not meeting the academic needs for our students.

Problem Statement 4: A systemic Intervention process is needed to fill in achievement gaps.
--

Perceptions

Problem Statement 1: In 2017-2018 there was a 25% teacher turn over rate.
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Goal 1: Student Achievement: Improve academic outcomes and prepare students to be college and career ready.


Performance Objective 9: ATTENDANCE

To increase student attendance from 89.5% to 91%.

Evaluation Data Source(s) 9: PEIMS reports on student attendance rates

Summative Evaluation 9:

Targeted or ESF High Priority

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
TEA Priorities Build a foundation of reading and math Connect high school to career and college 1) Continue and refine the "Project Red" Dropout prevention program to recover students who are "No Shows" or who have repeated attendance violations, including an Attendance Committee, student tracking, weekly data pulls, case management, and interventions. Interventions may include A+, Night School, Attendance Recovery, Counseling, OFSD, Career Academy, etc).		Assistant Principal, Attendance Officer	Attendance Folders documenting supports provided; Improved attendance. Lower drop-out rate.				
	Problem Statements: Demographics 1 Funding Sources: 199 - Local - 2000.00						
2) SAPP Social workers will provide case management to students to ensure all services are provided to students in a timely manner. Case Managers will assist teenage parents by connecting them to resources, such as Medicaid, childcare, and CEHI.		School Age Parent / Homeless Specialist	Increase the number of school age parents graduating in four years.				
TEA Priorities Build a foundation of reading and math Connect high school to career and college 3) Students who meet campus defined attendance goals will be provided with motivational incentives.		Assistant Principals	Increase in student daily attendance.				
	Problem Statements: Demographics 1 Funding Sources: 199 - Local - 2000.00						
							

Performance Objective 9 Problem Statements:

Demographics
Problem Statement 1: Our ADA continues to decrease from 89.9% in 2017- 2018 to 89.4% year to date. Root Cause 1: Students are not engaged in relevant learning.

Goal 1: Student Achievement: Improve academic outcomes and prepare students to be college and career ready.

Performance Objective 10: COLLEGE and CAREER READY

Increase performance on Pre-Scholastic Aptitude Test (PSAT) - Scholastic Aptitude Test (SAT) - American College Testing (ACT) to meet the national average in 3 years;

- Increase the percentage of students scoring a 3 or higher on Advanced Placement (AP) Exams from _% to _%.
- Increase the percentage of students meeting TSI Criteria in both Reading and Math from _% to _%
- Increase the percentage of students earning at least 3 hours in ELA or Mathematics or 9 hours in any subject from _% to _%.
- Increase the percentage of students earning an industry based certification from approved list from _% to _%
- Increase the percentage of students graduating with a completed IEP and Workforce Readiness from _% to _%.
- To increase the percentage of students receiving industry based certifications.


Evaluation Data Source(s) 10: The performance of this objective will be evaluated using the 2019 College Career, and Military Readiness Data Table.

Summative Evaluation 10:

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
1) Students will participate in college preparation coursework (e.g.,Pre-AP, AP, PSAT) to promote general college readiness and improve academic performance on PSAT, ACT, AP and SAT exams.		Counselors	Student Performance on PSAT, ACT, SAT and AP exams				
	Funding Sources: 199-High School Allotment PIC 31 - 45000.00						
2) Students will engage in a variety of literary genres and modes of writing in preparation for future college admission assessments.		ELAR Coaches	Increased student performance on state assessments (STAAR) and college admissions assessments				
3) CTE: High School students will be provided the instruction and the opportunity to test for industry certifications related to their content area. Upon successful completion of content, Certificates of Completion for certain areas of instruction will be awarded.		CTE Administrator	Number of certifications and certificates of completion				
	Funding Sources: 244 - CTE PIC 22 - 0.00						
4) Students will be provided four credit by examination opportunities as required by state mandate.		Counselors	Increase number of students receiving credit by exams				

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
5) Students will take Texas Success Initiative (TSI) assessment in preparation for college readiness and promote entry to dual credit courses, including entry into the Early College High School Program.		Counselors	Successful completion of TSI and increased enrollment in dual credit courses.				
6) Students will participate in college visits and college signing day events organized by counselors to celebrate acceptance to universities and colleges.		Counselors	Increased number of students attending college and universities.				
Funding Sources: 199 - Local - 1600.00							
7) Students will participate in college and career readiness events to promote post-secondary education such as, Texas Association of Collegiate Registrars and Admission Officers (TACRAO) college night , financial aid night, Cafe College, and college campus visits		Counselors	Increase number of students applying to college				
Funding Sources: 199 - Local - 400.00							
8) Students will participate in the analysis of stimuli, discussion, and debate to formulate their own ideas and to write evidence-based arguments.		ELAR Coaches	Increased student achievement results on Unit Assessments, benchmarks, STAAR and student products.				
Funding Sources: 199 - State Compensatory PIC 30 - 2000.00							
9) Counselors and Social Workers will Conduct Career Day at each campus where speakers discuss course of study students need to follow in order to enter chosen career/profession.		Counselors	Increased career awareness.				
10) Counselors will set up a COLLEGE CORNER at each campus with information on ACT/SAT, TSI Testing, Financial Aid Forms, Scholarship Information and College Information.		Counselors	Increased awareness of college and careers.				
11) Collaborate with agencies and organizations that deliver college, scholarship and financial aid resources. - San Antonio Education Partnership - Project STAY - Good Samaritan Center - Upward Bound - Advise TX		Counselors	Increased number of students applying to a 4 year college/university.				
12) Collaborate with local scholarship organizations that award scholarships to EISD high schools. Distribution of scholarship funds will be given through Student Support Services.		Counselors	Increased number of students attending college and universities.				

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
13) Students and Parents will be provided information and transition guides to prepare for completion of high school in four years. Students and parents will be able to explore programs of study offered at the campus at the Endorsement Showcase and parent night.		Counselors	Graduation completion in four years				
	Funding Sources: 199 - Local - 3000.00, 199-CTE PIC 22 - 0.00						
14) In collaboration with high school counselors, conduct high school grade level meetings with parents to review grade level transition guides.		Parent Engagement Liaison	Sign-In sheets and Increase in Parental Involvement.				
15) Provide increased opportunities for students to become involved in extracurricular events that encourage their attendance at school and promote school unity, such as band, cheer leading, dance team, JROTC, CTE, clubs, athletics, student organizations, and various UIL activities and competition.		Principal, VP, Counselors and APs	Increased student achievement on Unit Exams, EOCs, benchmarks and other appropriate assessments.				
	Funding Sources: 199 - Local - 22550.00						
16) Students will participate in Elective Classes such as Art, Journalism, and LOTE to complete requirements for graduation.		Principal	Increased graduation rate.				
	Funding Sources: 199 - Local - 2900.00						
17) Students will explore and understand CTE TEKS and CTE courses through implementation of TEKS and CTE supplemental materials, curriculum and industry standard equipment.		Vice Principal	Increased student achievement results on Unit Exams, benchmarks, Industry Based Certifications, EOCs, and other appropriate assessments.				
	Funding Sources: 199-CTE PIC 22 - 0.00, 244 - CTE PIC 22 - 0.00						
18) CTE students will create Student Intervention Folders (SIF) consisting of student work samples to monitor student academic progress.		Vice Principal	Classroom Walk-throughs, SIF Folder Check				
19) CTE students will be monitored for progress in their respective CTE courses BOY, MOY and EOY.		Vice Principal	Successful completion of CTE coherent courses and CTE certifications				
20) Students will participate in continuous growth opportunities in the area of ELL and differentiated instruction by CTE staff.		Vice Principal	Campus Walk-through Data				
21) All students will be offered the opportunity to participate in targeted tutoring aimed at specific Reporting Categories and TEKS. Tutoring will also be structured to address the specific weaknesses of those students who have not been successful on EOCs to include Saturday School.		Principal and VP	Increased student achievement results on Unit Assessments, benchmarks and STAAR				
	Funding Sources: 199 - Local - 45572.00						

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
22) Chess Tournament will be extended to high school students to increase parent attendance at extra curricular activities.		Parent Engagement Coordinator	Increase in attendance at Chess Tournament and Parent Involvement				
23) Student will participate in Thinking Classroom/ Spaces with quality questioning. Promoting rigor in the classroom and hand on experiences that are academically, intellectually, and personally challenging.	Problem Statements: Demographics 1 - Student Academic Achievement 1, 2 - School Processes & Programs 1, 2, 3, 4 Funding Sources: 199 - Local - 44800.00, 211 - Title I - 40000.00						
24) Students will participate in educational Field Trips.		Principal	Increase in College Career and Military Readiness.				
25) Classroom and lab opportunities that prepare students through hands on experiences for on the job training. Classroom and trainings will Include fostering the learning of technical skills and industry standards for labs by relating real-world attire, uniforms, and professional dress.		CTE Administration, Vice Principal	Successful completion of CTE coherent courses and CTE certifications				
26) Students in Alamo Academies DC classes will be provided instructional materials and be able to attend instructional classes, activities and orientations on the college campuses to better familiarize themselves with the collegiate instructional needs for long term academic success.		Campus and CTE Administration Counselors	Increase in number of students completing dual credit courses and Level 1 Certificates.				
							

Performance Objective 10 Problem Statements:

Demographics
Problem Statement 1: Our ADA continues to decrease from 89.9% in 2017- 2018 to 89.4% year to date. Root Cause 1: Students are not engaged in relevant learning.
Student Academic Achievement
Problem Statement 1: Students performance continues to decrease in English I and II
Problem Statement 2: Student performance continues to decrease in Algebra I.

School Processes & Programs
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Problem Statement 1: Advance academic programs are not aligned for student success.
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Problem Statement 2: Our Special Education Program is not meeting the academic needs of our students.
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Problem Statement 3: Our ESL Program is not meeting the academic needs for our students.

Problem Statement 4: A systemic Intervention process is needed to fill in achievement gaps.
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Goal 2: Organizational Learning and Leadership Development

Performance Objective 1: EFFECTIVE LEADERSHIP

Evaluation Data Source(s) 1:

State assessment scores and monitoring reports

Summative Evaluation 1:

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
1) Campus Leadership will monitor compliance with state and federal grant initiatives and conduct program evaluations to inform/improve programs.		Principal	Compliance reports and program evaluation				
2) Perform Comprehensive Needs Assessment (CNA) and implement campus/district improvement plans to improve student performance.		Principal	CNA and Campus Improvement Plan (CIP)				
3) Implement grant programs efficiently and effectively to accomplish program goals/objectives.		Principal	Compliance reports				
4) Campus Leadership will participate in Professional Development to better support teachers.		Principal	Teacher Retention				
Funding Sources: 199 - Local - 240.00							
5) Campus Leadership will provide a space conducive to meet the needs of PLC's and other meetings on campus.							
Funding Sources: 199 - Local - 4000.00							
TEA Priorities Recruit, support, retain teachers and principals		Principal	Student and Teacher Retention				
6) Campus Leadership will provide a space conducive for a positive climate and culture .							
Problem Statements: Demographics 1 - Perceptions 1							
Funding Sources: 199 - Local - 1000.00							
							

Performance Objective 1 Problem Statements:

Demographics
Problem Statement 1: Our ADA continues to decrease from 89.9% in 2017- 2018 to 89.4% year to date. Root Cause 1: Students are not engaged in relevant learning.

Perceptions

Problem Statement 1: In 2017-2018 there was a 25% teacher turn over rate.

Goal 3: Exceptional Learners: To improve instructional programs to meet the needs of all exceptional learners.

Performance Objective 1: SPECIAL EDUCATION

- Increase Special Education student performance in Algebra I EOC from _% to _%
- Increase Special Education student performance in EOC ELA I from _% to _%
- Increase Special Education student performance in EOC ELA II from _% to _%
- Increase Special Education student performance in Biology from _% to _%
- Increase Special Education student performance in EOC Social Studies from _% to _%.

Evaluation Data Source(s) 1: This objective will be evaluated using 2019-2020 STAAR Scores.

Summative Evaluation 1:

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
Additional Targeted Support Strategy TEA Priorities Build a foundation of reading and math Connect high school to career and college Improve low-performing schools 1) Students will participate in specialized instruction by a special education teacher targeting individual student needs utilizing a variety of a modalities.		Vice Principal	Increased student achievement results on Unit Assessments, benchmarks, STAAR and other appropriate program assessments.				
	Problem Statements: School Processes & Programs 2						
Additional Targeted Support Strategy TEA Priorities Build a foundation of reading and math Connect high school to career and college Improve low-performing schools 2) Students will receive related services as identified by the ARDC. Consultants will provide services such as: speech therapy, OT/PT Therapy, Deaf Interpreters, language interpretation, music therapy and psychological assessment.		Vice Principal	Increased student achievement results on Unit Assessments, benchmarks, STAAR and other appropriate program assessments.				
	Problem Statements: School Processes & Programs 2						

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
<p>Additional Targeted Support Strategy TEA Priorities Build a foundation of reading and math Connect high school to career and college Improve low-performing schools</p> <p>3) Students will engage in differentiated instruction that addresses individual student needs as specified in their Individualized Education Plans (IEPs).</p>		Special Education Instructional Coordinator	Increased student achievement based on IEP report card				
Problem Statements: School Processes & Programs 2							
<p>Additional Targeted Support Strategy TEA Priorities Build a foundation of reading and math Connect high school to career and college Improve low-performing schools</p> <p>4) Students will participate in specialized instruction by a special education teacher targeting individual student needs utilizing a variety of a modalities.</p>		Vice Principal	Increased student achievement results on Unit Assessments, benchmarks, STAAR and other appropriate program assessments.				
Problem Statements: School Processes & Programs 2 Funding Sources: 224 - Title I - SPED PIC 23 - 3750.00, 199 - Local - 2571.00							
<p>Additional Targeted Support Strategy TEA Priorities Build a foundation of reading and math Connect high school to career and college Improve low-performing schools</p> <p>5) Special education teachers will use eSped to document ARDs. Bilingual ARDs will be audio recorded. Parents will receive an audio copy of the ARD. Program specialists are meeting with teachers to ensure that teachers have a complete understanding of eSped. Professional development: Ongoing</p>		Vice Principal	use of eSped for all ARDs				
Problem Statements: School Processes & Programs 2							
<p>Additional Targeted Support Strategy TEA Priorities Build a foundation of reading and math Connect high school to career and college Improve low-performing schools</p> <p>6) Special education teachers and paraprofessionals will participate in professional development sessions to include research based instructional practices and strategies, accommodations, and modifications that address the academic, functional, and behavioral needs of students with disabilities.</p>		Assistant Principal	Increased student achievement among students who participate in Special Education				
Problem Statements: School Processes & Programs 2							

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
7) Special Education teachers, will participate in intensive planning sessions utilizing resources to ensure appropriate vertical alignment, vocabulary development, depth and complexity.		Assistant Principal	Increased student achievement results on Unit Assessments, benchmarks, STAAR, TELPAS, "Look for" document and appropriate program assessments.				
	Problem Statements: School Processes & Programs 2						

Performance Objective 1 Problem Statements:

School Processes & Programs
Problem Statement 2: Our Special Education Program is not meeting the academic needs of our students.

Goal 3: Exceptional Learners: To improve instructional programs to meet the needs of all exceptional learners.

Performance Objective 2: ENGLISH LANGUAGE LEARNERS (Current)

- Increase English learners performance in Algebra I from _% to _%
- Increase English learners performance in ELA I EOC _% to _%
- Increase English learners performance in EOC ELA II from _% to _%
- Increase English learners performance in EOC Biology from _% to _%
- Increase English learners performance in EOC US History from _% to _%
- Decrease TELPAS beginning and intermediate Composite Rating levels for students in U.S. schools multiple years from _% to _%.

Evaluation Data Source(s) 2: The performance of this objective will be measured using STAAR Scores, STAAR Progress measure or ELL progress measure data.

Summative Evaluation 2:

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
<p>TEA Priorities Build a foundation of reading and math Connect high school to career and college 1) ELL students will engage in instructional programs to address their linguistic needs based on Language Proficiency Assessment Committee (LPAC) recommendations utilizing the ELLevation Platform.</p>		Principal	Increased student achievement results on Unit Assessments, benchmarks, STAAR, appropriate program assessments and ELL student performance on TELPAS				
	<p>Problem Statements: Student Academic Achievement 1 - School Processes & Programs 3 Funding Sources: 199 - Local - 734.00</p>						
<p>TEA Priorities Build a foundation of reading and math Connect high school to career and college Improve low-performing schools 2) EL students will participate in campus monitoring to ensure that graduation requirements are met and are in accordance with their cohort group. (Project Red)</p>		Counselor	PBMAS report & graduation rate for EL students				
	<p>Problem Statements: School Processes & Programs 3 Funding Sources: 199 - Local - 0.00</p>						

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
TEA Priorities Build a foundation of reading and math Connect high school to career and college 3) ELL student writing samples and TELPAS proficiency level descriptors (PLDs) will be consistently used to rate ELL students		Instructional Coach	Students will engage in writing activities based on ELPS English Language Proficiency Standards.				
	Problem Statements: Student Academic Achievement 1 - School Processes & Programs 3						
TEA Priorities Build a foundation of reading and math Connect high school to career and college Improve low-performing schools 4) EL students (recent immigrants and students with beginning and intermediate English proficiency levels) will be enrolled in English for Speakers of Other Languages (ESOL) I and ESOL II classes.		Principal	Increased ELL student achievement results on Unit Assessments, benchmarks, STAAR EOC English I and II and appropriate program assessments.				
	Problem Statements: School Processes & Programs 3 Funding Sources: 199 - Local - 0.00						

Performance Objective 2 Problem Statements:

Student Academic Achievement
Problem Statement 1: Students performance continues to decrease in English I and II
School Processes & Programs
Problem Statement 3: Our ESL Program is not meeting the academic needs for our students.

Goal 3: Exceptional Learners: To improve instructional programs to meet the needs of all exceptional learners.

Performance Objective 3: MIGRANT EDUCATION





Ensure that identified Priority for Service (PFS) migrant students have the same opportunity to meet the challenging state, content, and student performance standards expected of all children. 100% of Priority for Service (PFS) migrant students will receive priority access to supplemental instructional and support opportunities.

- Increase Migrant student performance in EOC Biology from 66% to 71%
- Increase Migrant student performance in EOC English I from _ % to _%
- Increase Migrant student performance in EOC Algebra 1 from _% to _% .

Evaluation Data Source(s) 3: Provided through shared service arrangement with Region 20

Summative Evaluation 3:

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
<p>TEA Priorities Build a foundation of reading and math Connect high school to career and college Improve low-performing schools 1) Provide parents of PFS students with the knowledge of local and state requirements for promotion, graduation and post-secondary opportunities Timeline: Community Outreach Fair, PAC meetings; individual meetings/phone calls with parents as needed</p>		Social Worker	Counselor follow-up, student feedback, agendas, sign-in sheets; tutor time sheets				
	Problem Statements: Student Academic Achievement 1 - School Processes & Programs 4						
<p>TEA Priorities Build a foundation of reading and math Connect high school to career and college Improve low-performing schools 2) Collect and analyze sources of student data (transcripts, testing data) to determine progress toward graduation. Timeline: Year Round</p>		Social Worker	Increased number of students completing credits and/or passing state assessments. Not on time for graduation report.				
	Problem Statements: Student Academic Achievement 1 - School Processes & Programs 4						

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
TEA Priorities Build a foundation of reading and math Connect high school to career and college Improve low-performing schools 3) Provide appropriate placement/programs for students not meeting the state content standards or mastering TEKS objectives. Ex: tutoring, state assessments, remediation, online migrant course work, credit recovery (Nova Net, Plato, FLEX, night school, etc.), summer school, or community resources/services. Timeline: Year Round		Social Worker	Increased number of students completing partial credit and/or passing state assessments. Partial credit report, retention report, formal/informal assessment.				
	Problem Statements: Student Academic Achievement 1 - School Processes & Programs 1, 4						
TEA Priorities Build a foundation of reading and math Connect high school to career and college Improve low-performing schools 4) Identify dropout students/out-of-school youth (OSY) and provide information regarding options for obtaining diploma/GED. Timeline: Year round		Social Worker	Identify and provide information regarding options to 100% of OSY students. Supplemental report, OSY Report, Student Termination Report				
	Problem Statements: Student Academic Achievement 1 - School Processes & Programs 4						
 = Accomplished  = Continue/Modify  = No Progress  = Discontinue							

Performance Objective 3 Problem Statements:

Student Academic Achievement
Problem Statement 1: Students performance continues to decrease in English I and II
School Processes & Programs
Problem Statement 1: Advance academic programs are not aligned for student success.
Problem Statement 4: A systemic Intervention process is needed to fill in achievement gaps.

Goal 3: Exceptional Learners: To improve instructional programs to meet the needs of all exceptional learners.

Performance Objective 4: GIFTED and TALENTED

- Increase advanced Level III student performance with Gifted and Talented students on EOC Biology from _% to _%.
- Increase advanced Level III student performance with Gifted and Talented students on EOC Algebra I from _% to _%.
- Increase advanced Level III student performance with Gifted and Talented students on EOC English I from _% to _%.
- Increase advanced Level III student performance with Gifted and Talented students on EOC English II from _% to _%.
- Increase advanced Level III student performance with Gifted and Talented students on EOC US History from _% to _%.

Evaluation Data Source(s) 4: TAPR Report

Summative Evaluation 4:

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
TEA Priorities Connect high school to career and college 1) Provide GT teachers, Pre-AP, AP teachers and advanced academic specialist professional development opportunities in advanced instructional strategies.		Assistant Principal	Increased student performance on AP exams				
	Problem Statements: School Processes & Programs 1						
TEA Priorities Connect high school to career and college 2) Students will be provided instructional resources and opportunities to advance academically in all core areas.		Vice Principal	Increased student achievement results on Unit Assessments, benchmarks, STAAR and other appropriate program assessments.				
	Problem Statements: School Processes & Programs 1 Funding Sources: 199 - Local - 2611.00						

Performance Objective 4 Problem Statements:

School Processes & Programs
Problem Statement 1: Advance academic programs are not aligned for student success.

Goal 4: Student Support Services: To provide a well rounded education to increase student achievement.

Performance Objective 1: GUIDANCE PROGRAM

To provide proactive developmental guidance program that addresses responsive services that supports social and emotional well-being of students, parents and staff.


Evaluation Data Source(s) 1: Increased academic achievement and graduation rate

Summative Evaluation 1:

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
TEA Priorities Recruit, support, retain teachers and principals Improve low-performing schools 1) Counselors, social workers and Communities in Schools (CIS) staff will conduct morning, lunch and after school groups targeting character traits, social skills and organizational skills		Assistant Principal	Decrease in the number of discipline referrals				
	Problem Statements: Demographics 1 - Perceptions 1 Funding Sources: 199 - Local - 250.00						
2) Social workers will utilize curriculum and work with student groups to build social skills, increase morale, on campus and encourage community service opportunities completed by students e.g. Random Acts of Kindness		Principal	Decrease in the number of discipline referrals				
	Problem Statements: Demographics 1 - School Processes & Programs 4 - Perceptions 1						
TEA Priorities Connect high school to career and college Improve low-performing schools 3) Counselors and Social Workers will organize events to promote positive family relationships.		Principal	Positive survey results				
	Problem Statements: Demographics 1 - School Processes & Programs 4						

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
<p>TEA Priorities Recruit, support, retain teachers and principals Improve low-performing schools</p> <p>4) Provide guidance content in a systematic way to all students via classroom guidance and small groups. Areas addressed through: GUIDANCE CURRICULUM Self-confidence development</p> <ul style="list-style-type: none"> - Motivation to succeed - Decision-making, goal- setting, planning, and problem-solving skills - Interpersonal effectiveness - Communication Skills - Cross Cultural Effectiveness - Responsible Behavior 		Principal	Increased number of guidance lessons provided to students will promote student success.				
	<p>Problem Statements: Demographics 1 - School Processes & Programs 4 - Perceptions 1</p>						
<p>TEA Priorities Recruit, support, retain teachers and principals Improve low-performing schools</p> <p>5) Address the immediate concerns of students for the purpose of prevention and intervention via individual counseling and small groups. Areas addressed through RESPONSIVE SERVICES:</p> <ul style="list-style-type: none"> -Academic Concerns - School-related issues - Tardiness -Absences - Truancy - Misbehavior - School-avoidance -Drop-out Prevention -Relationship concerns -Physical/sexual/emotional abuse -Grief/loss -Substance abuse -Family issues -Harassment Issues -Coping with stress 		Principal	Decreased in discipline referrals. Increased in Student Attendance.				
	<p>Problem Statements: Demographics 1 - School Processes & Programs 4 - Perceptions 1</p>						

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
<p>TEA Priorities Connect high school to career and college 6) Assist students to monitor and understand their own development for the purpose of student planning and goal setting Areas addressed through: INDIVIDUAL PLANNING: Educational: - Acquisition of study skills - Awareness of educational opportunities - Lifelong learning - Utilization of test scores Career: - Knowledge of potential career opportunities - Knowledge of career and technical training - Knowledge of positive work habits Personal-Social: - Development of healthy self-concepts - Development of adaptive and adjusting social behavior</p>		Head Counselor	Students will gain self-knowledge and awareness of personal/social development.				
<p>Problem Statements: School Processes & Programs 4</p>							

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
TEA Priorities Improve low-performing schools 7) Include program and staff support activities and services for the purpose of guidance and counseling program delivery and support. Areas addressed through: SYSTEM SUPPORT: - Guidance program development and management - Parent Education Teacher/administrator consultation -Staff development for educators -School improvement planning -Counselor's professional development -Research and Publishing assistance -Community Outreach -Public Relations planning, evaluation and interpretation of standardized testing program.		Principal	Evidence of support for Student Support Services staff and community.				
	Problem Statements: Demographics 1 - School Processes & Programs 4 - Perceptions 1 Funding Sources: 199 - Local - 750.00						
TEA Priorities Recruit, support, retain teachers and principals Improve low-performing schools 8) Social Workers will provide case management to our students that need on-going counseling. They will provide intense case management to include home visits.		Assistant Principal	Increase in Student Academic Success.				
	Problem Statements: Demographics 1 - School Processes & Programs 4 Funding Sources: 199 - Local - 250.00						
9) Student Support Services Staff members will participate in department meetings, professional development conferences and workshops.		Director of Student Support Services	Increase knowledge of researched based techniques.				
	Funding Sources: 199 - Local - 690.00						
10) Identify homeless students and coordinate support services to ensure that homeless students are present at school		School Age Parent /Homeless Specialist	Increased attendance rate for homeless student population				
11) Implementation of anti-bullying comprehensive curriculum in K-12 classrooms		Director of Student Support Services	Decreased number of bullying incidents				
							

Performance Objective 1 Problem Statements:

Demographics

Problem Statement 1: Our ADA continues to decrease from 89.9% in 2017- 2018 to 89.4% year to date. **Root Cause 1:** Students are not engaged in relevant learning.

School Processes & Programs

Problem Statement 4: A systemic Intervention process is needed to fill in achievement gaps.

Perceptions

Problem Statement 1: In 2017-2018 there was a 25% teacher turn over rate.

Goal 4: Student Support Services: To provide a well rounded education to increase student achievement.

Performance Objective 2: GRADUATION and DROPOUT PREVENTION





-To increase the graduation rate for the four year longitudinal cohort from % in 2018-2019 to % in 2019-2020.

-To decrease the drop-out rate in grades 9-12 from ___% in 2018-2019 to ___% in 2019-2020.

Increase percentage of school age parents graduating from high school from ___% to ___%.

Evaluation Data Source(s) 2: Increase in graduation rate; the performance of this objective will be evaluated using School Age Parent Program (SAPP) reports and district graduation reports

Summative Evaluation 2:

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
1) Complete Personal Graduation Plans for all 9th -12th grade students, as required by Texas Education Agency.		Director of Student Support Services	Increase graduation rate.				
2) SAPP social workers will provide case management to students to ensure all services are provided to students in a timely manner. Case managers assist teenage parents by connecting them to resources e.g. Medicaid, childcare, Children's Environmental Health Initiative (CEHI) etc.		School Age Parent Homeless Specialist	Increase the number of school age parents graduating in four years.				
3) Student attendance, dropout and recovery rate will be monitored with a systemic program Project RED (Recovering Every Dropout)		Director of Student Support Services	Increase four year graduation rate and reduce dropout rate				
4) Students will participate in acceleration instruction programs to prepare them for subsequent grade levels.		Vice Principal	Meet requirement for promotion to subsequent grade level				
Funding Sources: 211 - Title I - 7000.00							
5) Students will participate in Graduation Ceremony after completing all requirements for graduation.		Assistant Principal	Increase in graduation rate.				
Funding Sources: 199 - Local - 22000.00							
 = Accomplished  = Continue/Modify  = No Progress  = Discontinue							

Goal 4: Student Support Services: To provide a well rounded education to increase student achievement.

Performance Objective 3: Decrease the number of students whose health screenings go unaddressed to fewer than ___% for vision, and fewer than ___% for hearing.

Evaluation Data Source(s) 3: The performance of this objective will be evaluated using reports from the Child Health Reporting System

Summative Evaluation 3:

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
1) School nurses will connect with parents of students who are uninsured to resources providing assistance for the identified needs(s).		Nurse	Increase student wellness.				
Funding Sources: 199 - Local - 240.00							




Goal 5: Family/Community Engagement: Build respectful and trustful partnerships with parents and families to improve students academic success.






Performance Objective 1: Parental and Community Involvement

Increase the number of parents involved by 10%

Evaluation Data Source(s) 1: The performance of this objective will be evaluated by attendance numbers of parents participating in meeting and events

Summative Evaluation 1:

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
TEA Priorities Improve low-performing schools 1) Parents will participate in parent workshops to learn more about the ways in which they can work with the campus to assist their child academically and socially.		Parent Liaison	Increase the number of parents attending parent engagement events				
	Problem Statements: Perceptions 2						
TEA Priorities Build a foundation of reading and math Connect high school to career and college 2) Collaborate with Counselors and Social Workers to present resources to parent liaisons to use to connect parents with community organizations and outside referrals.		Parent Liaison	Sign-in documentation				
	Problem Statements: Perceptions 2						
TEA Priorities Build a foundation of reading and math Connect high school to career and college 3) Provide Parent information sessions to incoming 9th graders to discuss HB 5 updates, endorsements and graduation requirements. To include completion of 4 Year Plan using Bridges.		Counselors					
	Problem Statements: Perceptions 2						

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June
TEA Priorities Build a foundation of reading and math Connect high school to career and college Improve low-performing schools 4) Work with Gear Up teams at both high schools to meet Gear Up goals for Parent participation		Assistant Principal	Sign in documentation and Gear Up ASPR Report				
	Problem Statements: Perceptions 2						
TEA Priorities Build a foundation of reading and math Connect high school to career and college 5) Conduct surveys to parents at BOY and EOY to find out what topics parents are interested in to increase their awareness and participation in meetings.		Assistant Principal					
	Problem Statements: Perceptions 2						
TEA Priorities Build a foundation of reading and math Connect high school to career and college 6) Parent Liaisons will promote the Parent Portal to parents. This will help parents keep up with their child's progress.		Assistant Principal	Number of Parents using Parent Portal				
	Problem Statements: Perceptions 2						
TEA Priorities Build a foundation of reading and math Connect high school to career and college 7) Parent Liaisons will send out a Campus Newsletter keeping parents informed and up to date with campus activities		Assistant Principal	Increase in parent involvement				
	Problem Statements: Perceptions 2						
TEA Priorities Build a foundation of reading and math Connect high school to career and college 8) Parent Liaison will host "Learning and Growing Together" Parent Series, Parent Information Session, and other Parent/Community Activities.		Assistant Principal	Increase in parent involvement				
	Problem Statements: Perceptions 2 Funding Sources: 211 - Title I - 3016.00, 199 - Local - 1000.00						
TEA Priorities Improve low-performing schools 9) Parents will participate in Parent Workshops.		Assistant Principal	Increase in Parent Involvement				
	Problem Statements: Perceptions 2 Funding Sources: 211 - Title I - 60.00						

Strategy Description	ELEMENTS	Monitor	Strategy's Expected Result/Impact	Reviews			
				Formative			Summative
				Nov	Jan	Apr	June

Performance Objective 1 Problem Statements:

Perceptions
Problem Statement 2: There is a lack of parental involvement for student success.

Comprehensive Support Strategies

Goal	Objective	Strategy	Description
1	1	1	Students will engage in vertically aligned lessons to include vocabulary development with depth and complexity based on intensive grade level planning that utilizes supplemental resources, and research based strategies.
1	1	2	Students will apply research based comprehension and writing strategies that ensure reading TEKS objectives are met with appropriate depth and complexity to purposefully advance understanding, comprehension and critical thinking in relation to literary texts.
1	2	1	Students will engage in Social Studies instruction designed around process standards by incorporating stimuli, various instructional strategies and identified critical thinking skills.
1	3	1	Students will participate in hands on activities to create engaging experiences.
1	3	2	Students will engage in productive struggle via low-floor, high-ceiling problems to enhance their critical thinking and problem solving skills.
1	4	3	Students will use interactive notebooks to organize, process and reference content knowledge including vocabulary and labeled stimuli
1	5	1	Students will participate in viable technology lessons that support, extend and enhance the core content area lessons, in order to bring relevance and real world connections to classroom lessons.
1	7	1	Increase expertise in TEKS through development of supplemental materials, assessment, data analysis, curriculum review.
1	7	3	The campus will to provide a qualified mentor to newly hired teachers with 0-3 years of experience.
1	7	4	All teachers will participate in EDGE meetings to develop Thinking Classrooms through quality questioning.
1	8	1	Students will participate in curriculum based assessments and benchmarks to monitor student progress in TEKS mastery throughout the year.

Texas put billions more into schools. Is that enough to help this high-poverty school district break out?

A new superintendent at the helm of Edgewood Independent School District is trying to move the schools beyond their reputation of struggle and dysfunction.

BY ALIYYA SWABY AUG. 19, 2019 12 AM



Superintendent Eduardo Hernandez, chosen by a state-appointed school board to run Edgewood ISD, wants parents to give his schools another look. 📷 Rachel Zein for The Texas Tribune

SAN ANTONIO — Palmira Aguirre has seen her fair share of principals come and go during her 23-year tenure as a teacher at John F. Kennedy High School — including most of a year when there was no permanent principal at all.

The Edgewood Independent School District physics teacher used to feel ashamed telling people where she worked — a school district managed by a board so mired in personal conflict that they couldn't make crucial hires to lead their high schools or their school system.

"It's like a revolving door," said Aguirre, who heads her high school's parent-teacher association. "There's no stability at the upper level."

In addition to leadership scandals over the past several years, Edgewood ISD has struggled with repeated low state ratings, a school board controlled by the state and an exodus of students to charter schools.

But with the help of an energetic new superintendent, district leaders are working to convince parents and students yet again that they're ushering in a new beginning. As Edgewood starts a new school year Monday, the district has the monetary backing of House Bill 3, a massive school finance law passed in May that aims to help Texas' poorest school districts, like Edgewood, pay teachers more and improve pre-K programs.

The Edgewood community has heard such promises before. The district was the lead plaintiff in a landmark Texas school finance lawsuit in 1984, accusing the state of failing to equitably fund public schools. Whether HB 3 provides the "transformative" change that the state's top leaders have promised will depend on whether school districts like Edgewood can use it to tangibly improve how they teach students.

And local leaders have a long way to go to convince demoralized parents and teachers who have stuck with them, in some cases for generations, that things will go better this time.

"I have a lot invested in the district," Aguirre said.

"We deserve a second look"

In 2016, the high-poverty school district on San Antonio's west side had reached a low point. The state decided to take over its school board, which was too paralyzed by toxic infighting to hire a permanent superintendent. Teachers were

leaving for other schools or careers at worryingly high rates, much higher than the state average.

By the time the state-appointed school board hired Eduardo Hernandez as the new superintendent last year, community members had lost trust in their local public schools. Hernandez, who had previously [turned four struggling schools](#) around as a Dallas ISD principal, worked to form relationships with parents in the neighborhood, many of whom had attended district schools as children.

He launched a series of "pláticas," casual chats often hosted in people's homes and at their dinner tables, to show how intently he was listening to their concerns. "Our board meetings are about people now. We're not talking over each other. We're listening. We're trying to work as a team," he said. "We're going through a re-acculturation of the district."

Among the newest attempts at reformation: partnering with a prominent city program to offer full-day pre-K, hiring a marketing coordinator to help rebrand Edgewood ISD and opening up the boundaries of the district so kids from other neighborhoods can attend its schools. The superintendent and school board have created a list of five goals, including a focus on student success and financial stewardship, that drive each decision they make.

Like many other urban districts, Edgewood ISD is battling the loss of students to charter schools and other school districts in Bexar County, and fewer students means less funding. Facing increasing competition for students, Hernandez has the tough job of severing the district from its reputation of poverty and struggle.

The new school finance law may help, giving Edgewood ISD about \$8 million more this year to provide employees with raises, beef up a team of social workers and hire more bilingual staff. There are signs that Hernandez — whose contract has already been extended for two more years — is moving the needle. Though many schools are still low-performing, parents who look up the district's state rating will see a C grade, up from a low D in 2018, meaning Edgewood ISD is no longer the lowest-scoring district in San Antonio.

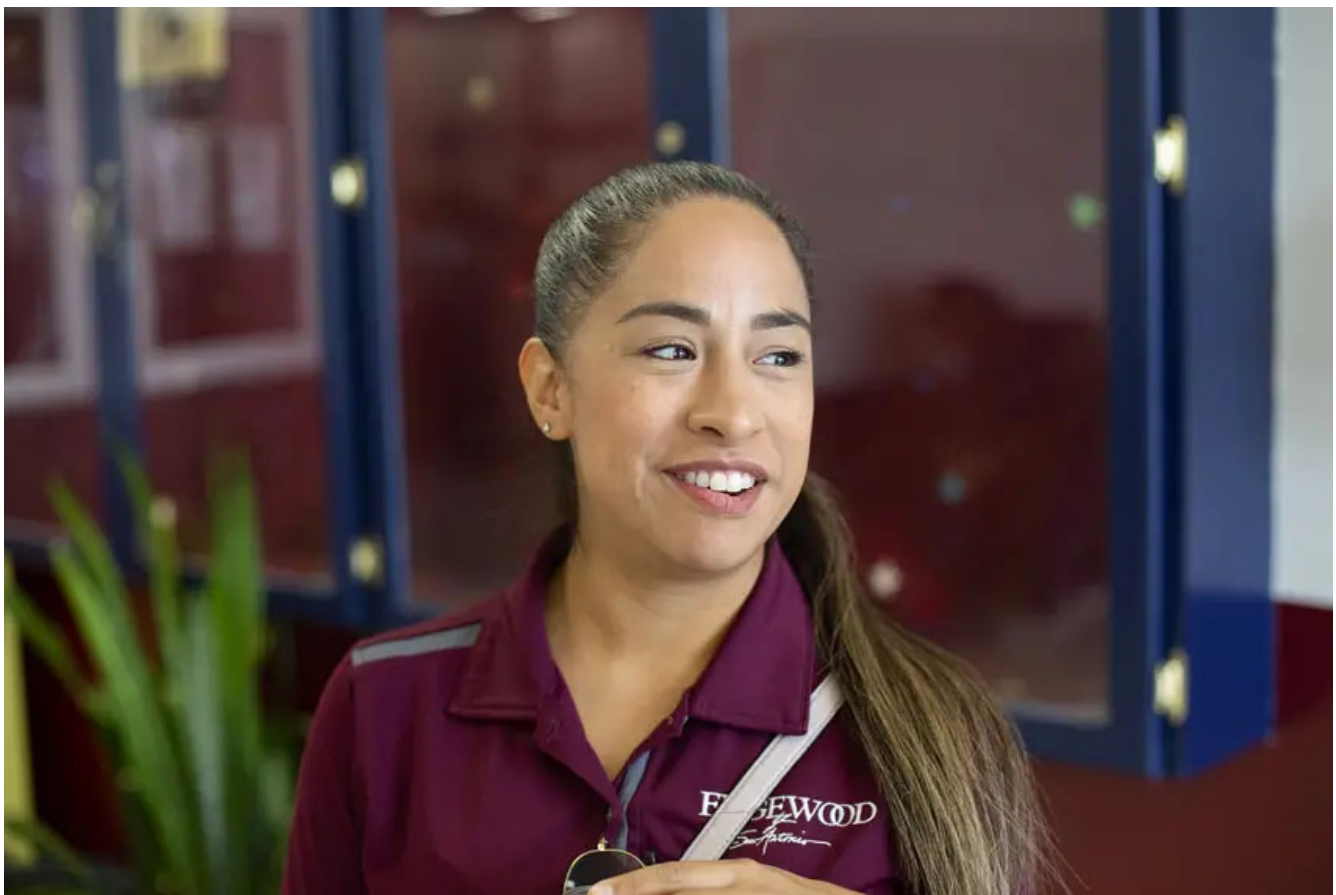
And for the first time this year, Brentwood, a middle school, has been designated an arts and science "school of innovation"; sixth-grade enrollment is projected to be almost double the previous year's.

"We're not saying we've arrived," Hernandez said. "What we're saying is we deserve a second look."

Working to heal relationships

One evening last week, Marisa Perez-Diaz, who oversees the district's strategic partnerships, faced a small group of parents, teachers and community members in the technology building's conference center.

"Over the past several years, there's been some fractured relationships between Edgewood and the community," she began, before going on to explain the many ways that parents can be engaged with their schools.



Marisa Perez-Diaz, a district administrator who also serves on the State Board of Education, is trying to get more parents engaged with their schools. 📷 Marjorie Kamys Cotera for The Texas Tribune

Sitting in the front row during the presentation, Rudy Lopez, president of the local neighborhood association, acknowledged that the district's progress has been "a little slow." But he's thrilled that the school board is actually functioning and that the superintendent is "thinking outside of the box" in bringing in new

programs and partnerships. The school board will transition out of state control and back to being fully elected by next spring.

Like the majority of people in the room, Lopez graduated from Kennedy High School; he left the neighborhood for another part of San Antonio but was pulled back after his mom got sick. "I really do like this community. I'm going to do my damndest to make sure we're an awesome school district as well," he said.

Lopez graduated the same year the Texas Supreme Court ruled for Edgewood ISD in a major school finance lawsuit against the state.

"Children who live in poor districts and children who live in rich districts must be afforded a substantially equal opportunity to have access to educational funds," Justice Oscar Mauzy wrote in the 1989 opinion striking down the state's school funding system as unconstitutional. But that ruling didn't lead to a complete fix, nor did six other lawsuits that made it to the state's Supreme Court over nearly three decades.

The billions lawmakers approved this spring for public education will pour into a school system that's now majority Hispanic and low income. The law is another state attempt at righting a longstanding failure to educate those students.

Just over three years ago, Kennedy High School had no principal, due to the school board's dysfunction. Now it has Graciela Martinez, who graduated from Edgewood High School before it was shut down in 1996. She still sees people she went to school with around the neighborhood, including some who she says were smarter than she was but were allowed to fall through the cracks.

"I was fortunate enough for whatever reason to be more of the high flyer, the one that was in all honors courses," she said. "What I reflected on later was that a lot of my peers didn't make it."

Hernandez is trying to shake up the way teachers and principals treat students, with a focus on students' emotional health instead of punitive discipline. Not everyone has embraced the new approach, Martinez said. They're still accustomed to leaders who don't stay and initiatives that don't stick.

"I think the change is coming. I don't think it's fully here yet," she said.

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Ambitious Plan Plots Edgewood ISD's Future on San Antonio's West Side





by **Emily Donaldson** < <https://therivardreport.com/author/emily-donaldson/>>


December 22, 2019

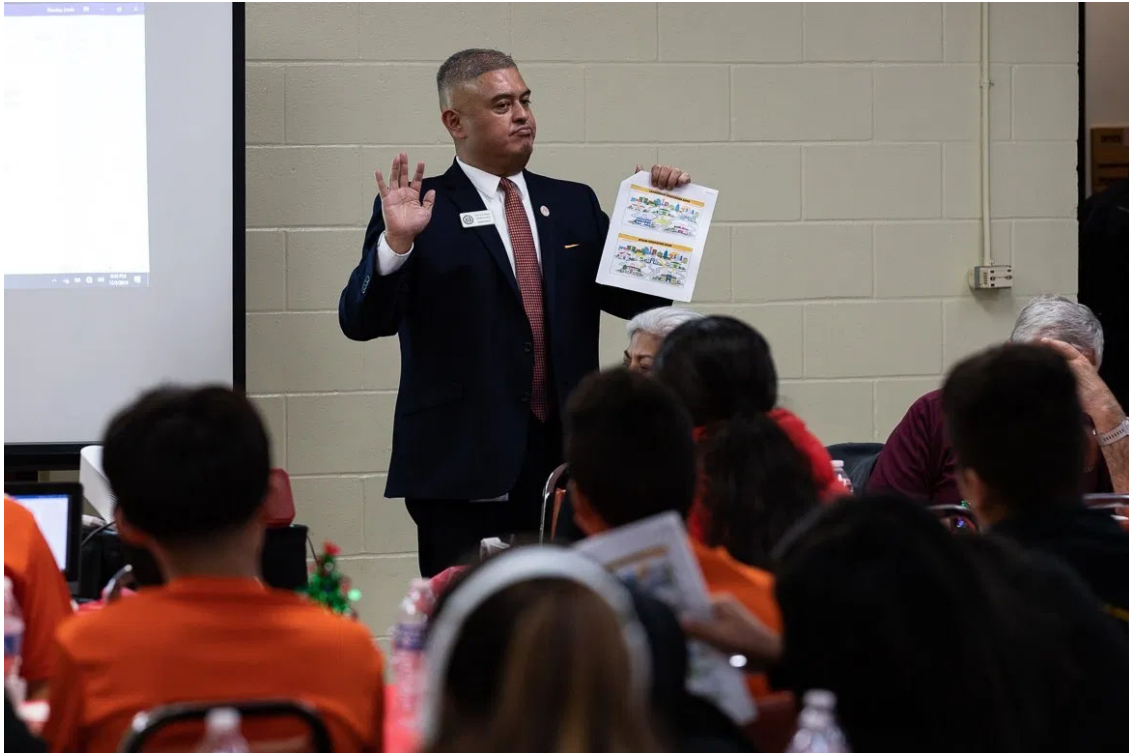
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Edgewood ISD Superintendent Eduardo Hernández speaks on the Innovation Plans & Census Information packet distributed at the Gus Garcia Middle School Community Plática. Credit: Stephanie Marquez / Rivard Report

Edgewood Independent School District, a 10,000-student school system on San Antonio’s West Side, is rich in historic moments.

In 1968, Edgewood High School students famously left their classrooms and walked off campus to protest what they saw as systemic discrimination against Latinos that perpetuated poor school conditions. Changes were made.

In 1984, the district was the original plaintiff in a notable **[court case < https://texaspolitics.utexas.edu/educational-resources/edgewood-isd-v-kirby>](https://texaspolitics.utexas.edu/educational-resources/edgewood-isd-v-kirby)** that resulted in overhaul of the State’s public school funding scheme.

Superintendent Eduardo Hernández hopes 2018 – the start of the district’s new five-year strategic plan – will signify another milestone in Edgewood ISD’s more than 100-year history, a turning point that will result in notable change. The plan is aimed at introducing new education models into a school system that has remained relatively unchanged in the last several decades.

If Hernández and his team are successful, Edgewood's 20 campuses will be home to career-focused high schools, two single-gender kindergarten-through-eighth-grade campuses, and new programs focused on STEAM (science, technology, engineering, art, and math) curriculum, performing arts, leadership, early childhood, and public service, all by the end of the 2022-23 school year.

“The idea is to teach our parents how to shop the school district almost like you're walking in the store,” Hernández said.

It's a relatively new concept for many living in Edgewood ISD and elsewhere in San Antonio. From the 1990s to the early 2000s, the only way for families to enroll students in schools outside their attendance boundaries was to gain acceptance into a magnet program or charter school with open enrollment. More recently, San Antonio ISD and other districts have created in-district charters, or schools that offer innovative learning programs and open enrollment to families living outside district boundaries.

Related: **[Edgewood Superintendent Unveils 5-Year Plan with New School Model Proposals < https://therivardreport.com/edgewood-superintendent-unveils-5-year-plan-with-new-school-model-proposals/>](https://therivardreport.com/edgewood-superintendent-unveils-5-year-plan-with-new-school-model-proposals/)**

This fall, Edgewood ISD became an open-enrollment district, meaning students living anywhere could choose to attend any Edgewood campus. The hope is to draw more students to the district at a time when enrollment has declined due in part to the rapid growth of area charter schools and funding is based on the number of students in class.

The poor academic performance of several Edgewood ISD campuses hasn't helped enrollment. In 2019, the district improved its rating in the State's accountability system from a D to a C, but 10 campuses were rated an F and three were rated a D.

At a recent *plática*, or community meeting, with families from Gus Garcia Middle School, Hernández introduced the idea of finding the best school “fit” to parents and their students. He told the 50 or so community members

present that they needed to change their mentality from just “go[ing] to the school down the street.”

The goal is to allow families to pick the school that will engage their student best.

Cynthia Reyes, whose daughter attends Gus Garcia Middle School and son attends Loma Park Elementary, asked how the process would work. Could she just take her child to whatever school seemed most appealing and enroll?

That would be the idea once each school has introduced a new school model and a proper enrollment system has been set up, Hernández said.

Reyes admitted she could see the value in it. While her daughter loves school, her son doesn't enjoy going to class.

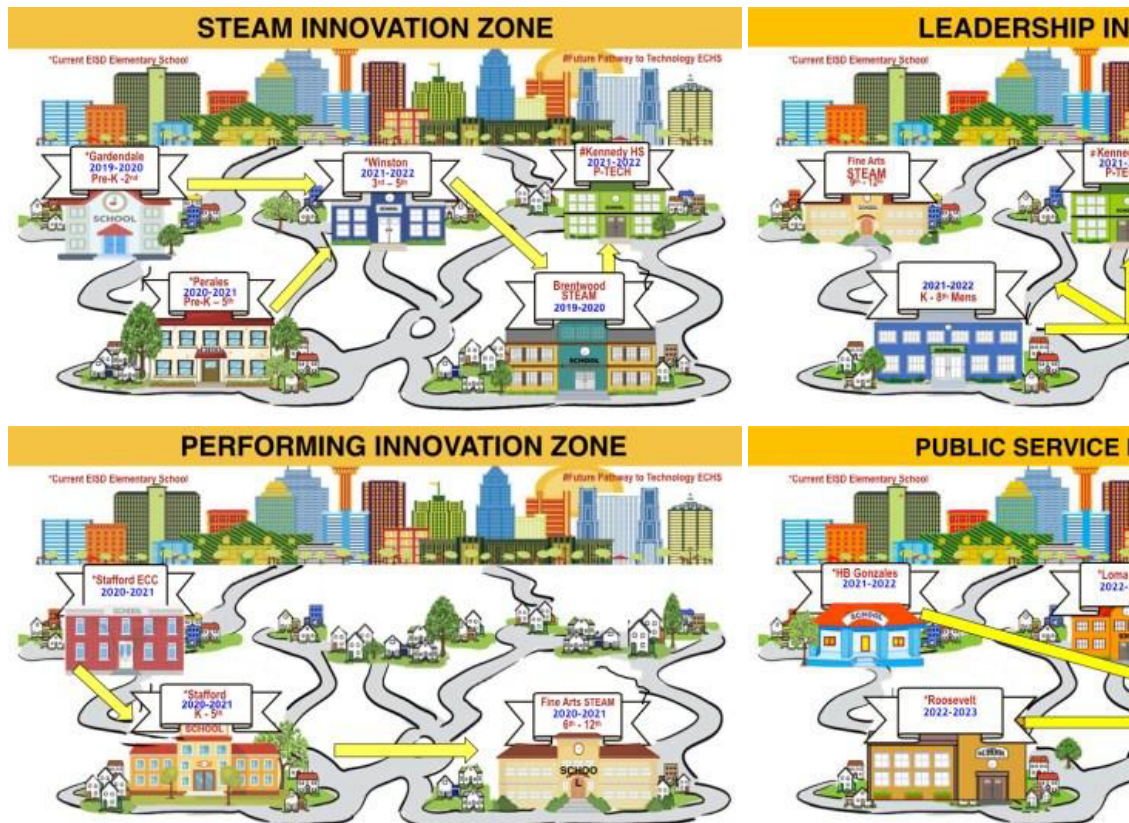
“Maybe if he picks his school, it will actually entertain him and keep him interested,” Reyes said.

Broad brushstrokes and ‘nitty gritty’ details

Hernández first **publicly unveiled his vision for the district at his 2019 State of the District speech last spring** < <https://therivardreport.com/edgewood-superintendent-unveils-5-year-plan-with-new-school-model-proposals/>>, held on the stage of the district's Theatre of the Performing Arts. He showed the crowd a rough blueprint for the future of the district and hinted at potential new models, including an all-girls school that is likely to open at Las Palmas Elementary in fall 2020.

This fall, one new school model **opened at Gardendale Elementary** < <https://therivardreport.com/school-districts-consider-expanding-full-day-pre-k-for-thousands-of-sa-4-year-olds/>>, where a prekindergarten through second grade program was introduced through a partnership with Pre-K 4 SA, the City's taxpayer-funded prekindergarten program. At Brentwood Middle School, the first cohort of sixth graders started STEAM-centered instruction.

Gardendale will fall into what Hernández calls the district’s early childhood innovation zone, a grouping of schools with similar models, and Brentwood fits into the zone focused on STEAM. There are still nine remaining elementaries, two middle schools, and two comprehensive high schools that have yet to change their educational model.



As part of Edgewood’s process for innovation, the district is giving principals a year away from their campuses to design new curriculums, instruction models, and operational details. They also visit successful school models around the country to learn best practices, Edgewood Chief Innovation Officer Christopher Nester said.

For example, the principal at Las Palmas Elementary who will turn the school into an all-girls model visited often-imitated all-girls schools throughout the United States. There are few public models to study in San Antonio other than San Antonio ISD’s Young Women’s Leadership Academy.

The principals of the new models at Perales Elementary and Las Palmas Elementary have been working in their year away from campus with San Antonio nonprofit City Education Partners through a fellowship program to plot out the future of their campuses.

Community input is a key part of Edgewood’s transformation strategy, both Nester and Hernández emphasized. District administrators regularly schedule *pláticas* with each campus community to loop them in on the process. The superintendent spoke before Gus Garcia families in early December and had another meeting planned on the subject for the following spring. Campus leaders are following suit.



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“[The principals] are having *pláticas* in the neighborhoods and asking parents, ‘What would you like to see? What would you like to be included?’ because we know this is going to come to pass, but we need [community] input,” Hernández said.



Gilbert, a Gus Garcia Middle School student, addressed Superintendent Eduardo Hernandez about the lack of functioning desks at his school.

While the district chief has broad ideas of what he wants Edgewood to look like in the coming five years, not all campuses have concrete plans.

For example, Hernández has determined both Memorial and Kennedy high schools likely will be the future sites of a P-TECH school, or career-focused high school where students can earn certifications and associate degrees. However, he hasn’t publicly announced details such as the focus of either P-TECH program.

Related: **[Sam Houston High School to House New Cybersecurity School in 2019](https://therivardreport.com/sam-houston-high-school-to-house-new-cybersecurity-school-in-2019/)** < **<https://therivardreport.com/sam-houston-high-school-to-house-new-cybersecurity-school-in-2019/>**>

This can be advantageous, the superintendent said. Should a new industry emerge in San Antonio in the next three years, the district has enough flexibility to adapt its offerings to satisfy the demand for labor.

Nester, a new addition to Edgewood ISD, spends most of his days on what he calls the “nitty gritty” points of the plan, filling in the details of the proposed instructional models and how to make the system work district-wide.

He believes the stakes are high for Edgewood, both academically and for the future of the district.

Related: **[State Gives Most Area School Districts Higher Scores, But 40 Campuses Fail Standards < https://therivardreport.com/state-gives-most-area-school-districts-higher-scores-but-40-campuses-fail-standards/>](https://therivardreport.com/state-gives-most-area-school-districts-higher-scores-but-40-campuses-fail-standards/)**

“We have to adapt and accommodate to our customers, which is our parents and our students,” Nester said. “Our job is either innovate, if you will, or perish, because everyone else around us is doing it.”

A crucial element

The success of Edgewood’s plan rests on the ability of each school’s leadership to effectively implement sweeping changes and train the campus’ teachers in the new instructional model. Hernández only selects a school to change its model once he has enough confidence in its principal.

“If we have those people here great, but if you’re not here for that, we can just respectfully separate,” Hernández told parents and families at the Gus Garcia *plática* in December. “We need more people who know that this is not a 9-to-5 job.”

At a Nov. 19 school board meeting, the Edgewood board broached what might be a consequence of the plan. Legal counsel talked to the board in closed session about what a reduction in force could look like if it was needed, **[according to the meeting’s agenda <](#)**

<https://v3.boardbook.org/Public/PublicAgenda.aspx?ak=15905&mk=50339479>.

The district's layoff, or reduction in force, **policy** < [https://pol.tasb.org/Policy/Download/174?filename=DFFB\(LOCAL\).pdf](https://pol.tasb.org/Policy/Download/174?filename=DFFB(LOCAL).pdf)> would allow the district to not renew the contracts of teachers who work in programs that are no longer needed. For instance, if an elementary school becomes a middle school, the district could reduce the numbers of elementary teachers at that campus.

District spokeswoman Keyhla Calderon-Lugo told the *Rivard Report* that there are no layoff plans at this time and that the discussion was about giving the board options as the innovation plan moves forward.

Susan Salinas, a Texas State Teacher's Association official who works with the Edgewood chapter, said that no one with the district has indicated any layoff plans.

Salinas did emphasize, however, the need for campuses to seek teacher input in their innovation plans. Sweeping changes can only be successful if teachers buy in and ensure everything is carried out properly, she added.

Related: **[Edgewood Superintendent Finalist: 'Efforts Are Good, But Results Are Better'](https://therivardreport.com/edgewood-superintendent-finalist-efforts-are-good-but-results-are-better/)** < <https://therivardreport.com/edgewood-superintendent-finalist-efforts-are-good-but-results-are-better/>>

The one person who will likely be around to make sure that happens is Hernández. **[Hired a little over a year and a half ago](https://therivardreport.com/edgewood-isd-names-new-leader-from-suburban-dallas-district/)** < <https://therivardreport.com/edgewood-isd-names-new-leader-from-suburban-dallas-district/>>, Hernández received a contract extension this spring through June 2023, a measure of trustees' confidence in the superintendent and his plan.

Board President Roy Soto said he backed the plan and remarked on how much it will transform what he experienced as a student in the 1970s.

“I think when you look in the district, as economically disadvantaged as it is, what is very important is that children have access,” Soto said. “If they have access to things beyond what has always been, we’re being more competitive. [Our students] will feel that they can do what any young person can do in any other school.

“I think this is going to be a great way for us to move our children and our young scholars forward, even if there is inequity.”



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TraderBillT 2 months ago

While this undertaking sounds like a noble effort to modernize the district's curriculum, the caption beneath the photo in the article says a lot: there is an ongoing lack of fundamental capacity such as serviceable student desks. Until that kind of problem is addressed and fixed, all the candy coating means nothing.

Nearly every district in the city is also being impacted by the rise of charter schools, which give parents more choices as to where their children can be better educated. It is unfortunate that our public school system forces many to continue to attend schools determined by where the family lives and not by the capability to maximize the student's potential.

Bexar County encompasses 17 separate independent school districts. The largest are NEISD and NISD. The smaller ones, such as Egewood, South San, and Southside are among those struggling with declining enrollment, lack of taxpayer funding, and low scores on standardized evaluations of the districts, not to mention the political fiefdoms that some of them have become. It is time to consolidate these districts to permit stronger tax bases, superior educators and modernized facilities. Doing so would also eliminate duplicate administrations (a big money saver) and, in some cases, unneeded real estate which could be sold off.

Egewood is one of those which needs to be incorporated into a larger, more efficiently functioning district. The time for such change is long past due.

Respect 🙏

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Campus-Wide News

Edgewood Independent School District School Board approves first-of-its-kind SB 1882 charter collaboration with A&M-San Antonio

By University Communications

Wednesday, 01 22 2020

*First-of-its-kind next step in customized ASPIRE program launches
Texas A&M-San Antonio Institute for School and Community Partnerships*

SAN ANTONIO – The Edgewood Independent School District (ISD) School Board voted Tuesday night to approve two SB 1882 partnerships with Texas A&M University-San Antonio.

Under the agreement, A&M-San Antonio will become an operating partner of Edgewood ISD institutions, Gus Garcia Middle School and the Burleson Center for Innovation and Education. The agreement details a collaboration with Edgewood ISD that provides Gus Garcia and Burleson Center administrative leadership, teachers and the surrounding community with the support needed to improve outcomes for current and future students. To facilitate these efforts, A&M-San Antonio is establishing the Texas A&M-San Antonio Institute for School and Community Partnerships, a nonprofit 501(c)(3) organization led by Dr. Carl Sheperis, dean of the University's College of Education and Human Development (COEHD).

“We are taking a wrap-around approach toward improving outcomes for students at Gus Garcia and the Burleson Center,” Sheperis said. “Both of the schools will be powered by the collective force of the A&M-San Antonio College of Education and Human Development and the greater A&M-San Antonio community. We will be able to jointly achieve outcomes that would be difficult in isolation.”

This collaboration with Edgewood ISD is the first of its kind under SB 1882, legislation that incentivizes ISD partnerships with institutions of higher education and other entities in order to improve student outcomes. The Edgewood ISD collaboration is also the initial step in the A&M-SA & South Bexar County ISDs Partnership to Impact Regional Equity and Excellence

(ASPIRE) program, launched Nov. 22, 2019, between A&M-San Antonio and seven south Bexar County ISDs.

“This partnership with Edgewood ISD is a great opportunity for us to launch one of the biggest elements of ASPIRE: SB 1882 lab schools,” Sheperis said. The COEHD will work directly with Edgewood ISD to operate the approved schools with the aim of creating a long-term and lasting impact for the community, according to Sheperis.

“Edgewood ISD continues to offer opportunities and choice for its students, which is part of the five-year innovation plan. We are excited to partner with Texas A&M-San Antonio as part of our collective efforts to enhance our programming for the students of Edgewood ISD,” said Dr. Eduardo Hernandez, Edgewood ISD superintendent of schools.

A&M-San Antonio and the ISDs participating in ASPIRE aim to create equitable opportunities across districts and enhance social mobility, income growth and career readiness for south Bexar County and the greater San Antonio area, and to tackle persistent challenges across the region. Along with Edgewood, participating ISDs that will be collaborating with A&M-San Antonio include East Central, Harlandale, Somerset, South San Antonio, Southside and Southwest. More agreements under ASPIRE are currently in development that will lead to collective and customized partnerships, respective to the ISDs.

###

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Texas A&M University-San Antonio

Established as a standalone university in 2009, Texas A&M University-San Antonio (A&M-San Antonio) is a comprehensive, four-year public university that reflects the culturally diverse, heritage-rich community it serves. Situated on nearly 700 acres in South San Antonio, A&M-San Antonio is a Military Embracing institution offering more than 40 undergraduate programs and 14 graduate programs to 7,000 students. A&M-San Antonio holds the HSI (Hispanic-Serving Institution) designation. Visit <https://www.tamusa.edu/> for more information.

Edgewood Independent School District

Edgewood Independent School District (ISD) provides an exceptional learning experience that engages, empowers and prepares students to compete and reach their highest potential in an ever-changing world. For more information, visit <https://www.eisd.net/>.

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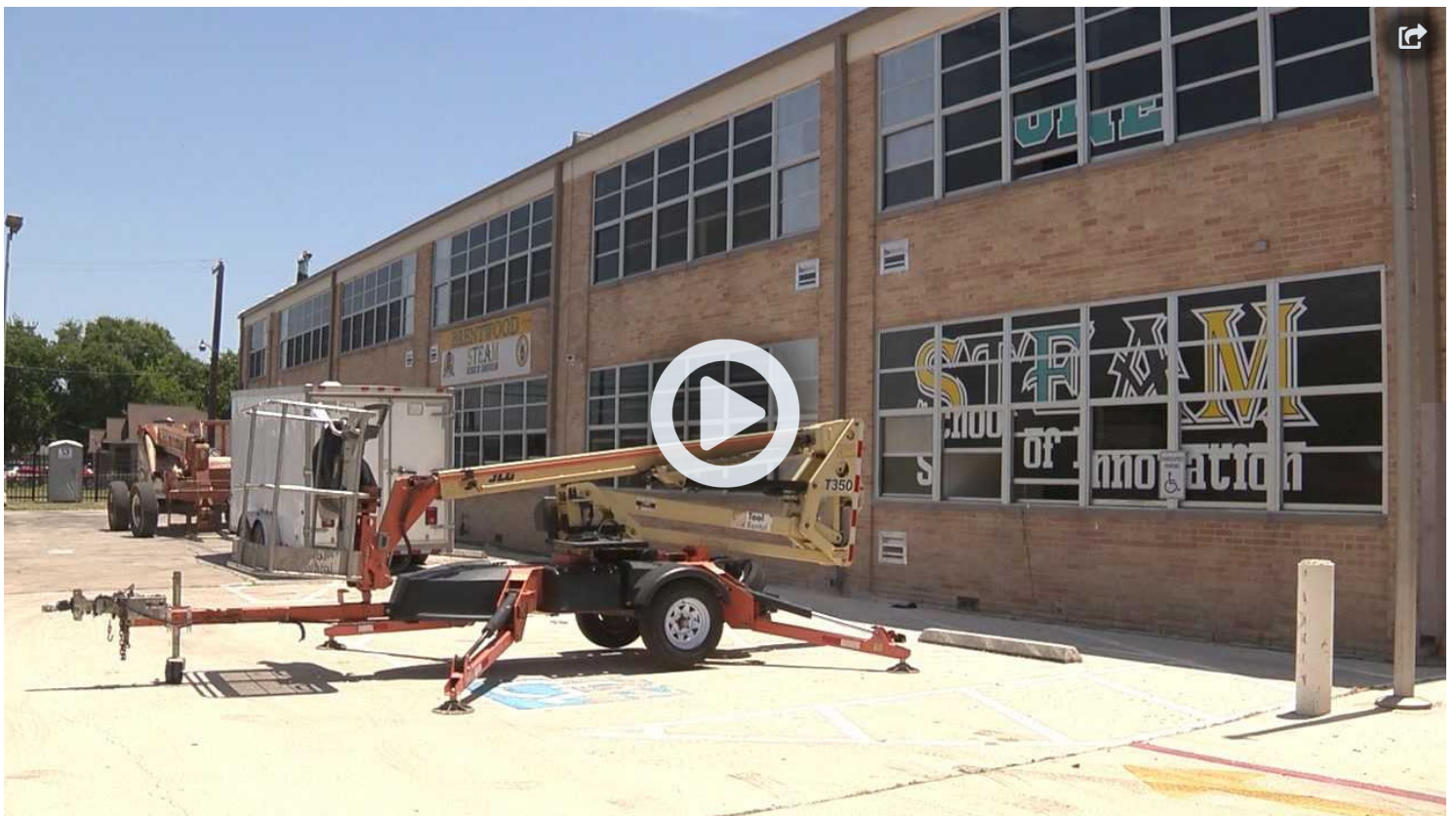
NEWS

Edgewood ISD invests \$1.2M in new, innovative school

Brentwood STEAM School of Innovation to encourage cybersecurity, robotics

Tiffany Huertas, Video Journalist**Jason Foster**, Executive Producer

Published: August 16, 2019, 2:40 pm

Tags: [Tech SA](#), [Education](#), [Tech](#), [News](#), [San Antonio](#), [Local](#)

SAN ANTONIO – Students at Edgewood Independent School District now have an option to focus on science, technology, engineering, arts and mathematics after a \$1.2 million investment.

"We are hoping to really inspire kids that want to go into cybersecurity, want to go into robotics," said Eva Reyna, principal of the [Brentwood STEAM School of Innovation](#).

Construction crews have been working this summer to have the new school ready for the first day of classes.

The new middle school will first enroll sixth-grade students for the 2019-20 school year and then in two years, [Brentwood STEAM School of Innovation](#) will have all three grade levels.

Reyna said teachers are already hard at work after coming back in July to begin training.

"So, our students are able to have choice in what they want to learn. We also have choice in how they learn, so that we can help them. We're really more specific to the students and their needs," Reyna said.

Reyna said students will explore, invent, collaborate and create in state-of-the-art classrooms.

"We're going to be using Android app tablets or Android tablets so the kids can learn how to create apps and in the other class, kids are going to be using something called a micro:bit, which is produced by Samsung," Reyna said. "The kids learn to program it and it has a bunch of projects that they can do, remote control to Android telephones or Apple telephones."

Reyna said that, once students finish at [Brentwood STEAM School of Innovation](#), the district hopes they are aligned for success when they go to John F. Kennedy High School.

As of now, the [Brentwood STEAM School of Innovation](#) said it has over 300 sixth-grade students enrolled and 14 teachers.

Edgewood ISD officials said approximately \$1.2 million was invested, which includes investments in technology, upgrades, furniture, campus renovations and heating, ventilation and air conditioning. It is part of the district's five-year plan to create five innovation zones.

Enrollment is open to students who live in and outside the Edgewood ISD boundaries.

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ABOUT THE AUTHORS:



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Tiffany Huertas is known for her in-depth storytelling and her involvement with the community.

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Edgewood ISD Names New Leader from Suburban Dallas District




by **Emily Donaldson** < <https://therivardreport.com/author/emily-donaldson/> >
May 24, 2018

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Edgewood ISD has selected a new superintendent. Credit: Bonnie Arbittier / Rivard Report

The Edgewood Independent School District board of managers voted Thursday night to name Eduardo Hernandez, the chief academic officer from Duncanville ISD, as the new superintendent. Hernandez will become superintendent effective June 19, board President Roy Soto said.

The board selected Hernandez from a pool of 47 applicants. Soto said the board was particularly impressed with Hernandez's experience as chief officer of academics and innovation and chief of schools in Duncanville ISD, a suburban Dallas school district that Soto described as similar to Edgewood.

Duncanville has a total student enrollment of about 12,800 students, the majority of whom are black and Hispanic. About 76 percent of Duncanville's student body are economically disadvantaged. More than 90 percent of Edgewood ISD's nearly 10,800 students are considered economically disadvantaged.

While Hernandez hasn't previously held a superintendent position, Soto said that he appeared familiar with Edgewood students' experience.



Before Hernandez's final interview, the Duncanville educator arrived early to get a sense of the local community, Soto said. When board members asked Hernandez what he saw, he said that the district looked familiar.

≤ <https://i2.wp.com/therivardreport.com/wp-content/uploads/2018/05/Screen-Shot-2018-05-24-at-9.36.08-PM.png?ssl=1>

Eduardo Hernandez

“He said, ‘I saw the place where I grew up. It just looked like the neighborhood and community where I grew up,’” Soto said of Hernandez’s response.

Hernandez previously worked in Terrell, Crowley, and Dallas ISDs. He grew up in East Dallas, Soto said.

Hernandez will replace Emilio Castro, who **resigned March 31** < <https://therivardreport.com/edgewood-isd-superintendent-castro-resigns-after-harassment-allegations/>> after harassment allegations were levied against him by a district employee. The district placed Castro on paid leave as it conducted an investigation into the allegations. Houston-based law firm Rogers Morris & Grover conducted the investigation, which cost the district more than \$35,000.

Chief Academic Officer Philip Chavez **served as interim superintendent** < <https://therivardreport.com/edgewood-isd-chief-placed-on-paid-leave-interim-replacement-named/>> after Castro notified the district of his intent to resign.

Related: **Edgewood ISD Superintendent Castro Resigns After Harassment Allegations** < <https://therivardreport.com/edgewood-isd-superintendent-castro-resigns-after-harassment-allegations/>>

The district first launched a search for Castro's replacement after his resignation. Edgewood held two community forums to get public feedback, although **few people turned out to give input** < <https://therivardreport.com/edgewood-isd-begins-superintendent-search-with-scant-community-involvement/>>. Those who did asked for a superintendent who would engage with the community and be honest and transparent.

The district interviewed candidates at the beginning of May and conducted follow-up interviews the week of May 14.

Edgewood ISD, a district on San Antonio's West Side, has been governed by a board of managers since May 2016. Commissioner of Education Mike Morath appointed a board of five managers after he determined the elected board of trustees lacked the ability to govern effectively.

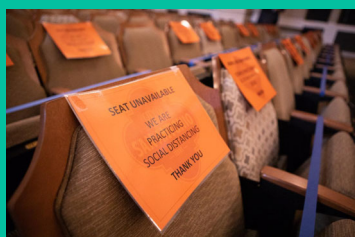
While the district has experienced a high rate of turnover in the superintendent's office in the years leading up to state intervention, Soto said the board of managers expects Hernandez to stay as superintendent for at least three to five years.

The next few years will mark some change for the district and its board of managers. Soto told reporters that sometime this year, two members of the elected board of trustees will join the board of managers. In 2019, two additional elected trustees will join the board, and two managers will step down from the board.

Trustee Eddie Romero said he was not aware which trustees would be selected to rejoin the board, adding that the decision is up to the Texas Education Agency.

Texas law mandates a 21-day waiting period before the selection of a superintendent becomes official. The board of managers will vote to make its decision final on June 19. Soto said that he did not know whether district residents would be able to meet Hernandez prior to his official hiring.

Hernandez is scheduled to appear at the June 19 board meeting, district spokeswoman Keyhla Calderon-Lugo said.



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Krista Torralva

Nov. 29, 2019 | Updated: Nov. 30, 2019 4:58 p.m.

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Eduardo Hernández, the Edgewood ISD superintendent, right, listens as the school district's Police Chief Jesse Quiroga speaks during a ...

Photo: Daniel Carde /Special Contributor

Sitting at a picnic table in a neighbor's yard, Maria Campos listened to Eduardo Hernández speak mostly in English about his five-year plan to open innovation schools in the Edgewood ISD.

Campos, a Spanish-speaker and mother of two, tapped the arm of a woman next to her, asking her to translate. The woman obliged. A few minutes later, Campos asked the same favor from another woman.

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to learn from the best of them. Plans include an all-girls academy, then one for boys.

At the end, Campos made a beeline to Hernández. For half an hour, she peppered him with questions — but not about the academies and big plans. While his ambitions have made a splash in the high-poverty, often-neglected school district on the West Side, sometimes all parents want to know are the basics.

My daughter has participated in mariachi and all of a sudden Ms. Luna is gone. Where is she?

And I heard parents say their kids are being passed to the next grade level without really knowing the material. I don't want that for my children.

My daughter is not being challenged enough in her class.

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No, no, I like to take the kids to the neighborhood school. And again, where is Ms. Luna?

He listened to Campos and didn't rush her as the yard emptied out. What you're saying is important, he told her.

"If I can get (parents) excited about the idea of a purpose-driven school, and teaching them how to shop for an education, then through those conversations we can discuss the basics," Hernández said later. "The basics are always important — high quality teachers, high quality principals and of course making sure our buildings are clean."

His mission has included a big dose of visibility in the community, listening to and persuading families that he is committed to not just stabilizing a historically unstable school district, but enhancing it.

Soon after arriving in July 2018, Hernández identified people who were invested in Edgewood, asking them to let him visit their homes and to invite the neighbors.

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faced was manifest.

'Relationship is severed'

Both the new Gardendale and Brentwood STEAM, both of which opened in August, are part of a plan to create five innovation "zones" — early childhood, STEAM, performing arts, leadership and public service.

At first, not a single Gardendale teacher volunteered to stay through the transition to a Pre-K 4 SA partnership.

"If we're going to build a zone then we need to do it right and at a pace that we can handle," Hernández said. "Because the thing I think our district has done in the past is, we jump on ideas and then the next year we forgot about it. I heard that all last year. 'Please don't do this and get us all happy about it and then (drop it)' and, 'You know what, I love your ideas but what if they get rid of you?'"

Instability had been a constant at Edgewood.

An earlier reform-minded superintendent, José Cervantes, arrived in 2011 and pushed for change on multiple fronts. But he took a buyout in 2015 as his relationship with his board soured amid concerns about the way he handled an abuse allegation at an early childhood campus.

At about the same time, a trustee stopped going to meetings and finally resigned, dogged by a domestic violence allegation, leaving a six-member board that was split 3-3 on major issues — including how to replace Cervantes.

Months of paralysis led Texas Education Commissioner Mike Morath to replace the board with an appointed slate of managers in 2016.

Retired San Antonio Independent School District Superintendent Sylvester Perez became interim superintendent. Late that year, the new board hired Emilio Castro as superintendent, but a board member in 2017 publicized anonymous emails about complaints that Castro

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superintendent.

Hernández said he spent his first year reaching people where they are — in their homes, churches, grocery stores — and saying, “Hey, we get it. This relationship is severed. With that being the case, there’s 10,000 kids coming into our schools. We have an obligation to reach out to one another.”

In a few years, the board will be a different team. Two weeks after it voted to hire Hernández, the state began the transition back to elected trustees by appointing two who had won in 2016 but had not been able to take office. More have followed.

Hernández has rolled ahead. While other area school districts turned down Pre-K 4 SA’s offer to be an outside partner that could trigger extra state funding, he enthusiastically embraced the Gardendale arrangement, a transition that still is in progress but already has brought in more than \$100,000 for the campus.

The board agreed to pour more than \$1 million into the former Hoelscher Elementary to create Brentwood STEAM, a middle school that has started with sixth-graders and will add seventh and eighth grades in the next two years.

Hernández said he started feeling his staff buy into his vision more fully after the board this year extended his contract to 2023.

He wanted staff — and parents and community members — to feel free to approach him, and set up an online calendar so they could schedule 15-minute meetings with him on Wednesday mornings called, “Let’s talk about it!”

“It speaks to being heard,” Hernández said.

Challenges ahead

He’s not worried about the changing lineup of board members. The trustees are “thought partners,” Hernández said. They have extensive study sessions that start in mid-afternoon and

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much. Nobody wants to get attached to one idea because they figure, ‘Oh, that board’s just going to get rid of the superintendent.’”

What is worrisome is that Edgewood this year had 10 failing schools — that’s half the district — under the state’s accountability ratings, begging the question: Is the district moving too fast, with ambitions getting in the way of the basics?

“We move fast where we have principalships. Wherever I have a leader that’s been there a while, I can move a little faster. Where I have leaders that are new, most of our principals are new, I’m trying to give them the appropriate time — which by research is three to five years — to get their ideas off the ground and really build enough relationships so they can do the work,” Hernández said.

He has demoted principals who he believed had been in place long enough for him to draw conclusions about.

“If you can’t produce the scores, then we’re going to ask you to go somewhere else where we work on you or maybe you’re going to learn some new skills and maybe come back to this,” Hernández said.

He’s investing in leadership training for principals and has managed to hire a few from San Antonio ISD who have turned around failing schools in that district.

“There’s no more micro-level governance than the campuses. They know exactly what they need,” Hernández said.

Ultimate customer: Students

On the first day of school in August, Hernández went from campus to campus welcoming the students. He wants each to know he or she is the ultimate customer.

“The fact that you’re here is important to us. And if nobody’s ever told you this, you are our patron,” Hernández said to sixth-graders at Brentwood STEAM. “If you need anything, we’re here to serve you.”

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She wanted him to know she recognized his efforts. When Davila got her turn, Hernández recognized her right away.

“She’s on our teen board,” he said, referring to a student panel he created last year that does leadership training with the superintendent and makes presentations to trustees.

“It’s amazing to know we have a person that wants to change things in the district,” Davila said.

“I want to be a school leader,” she added. “This is where I grew up. I always want to call this home.”

Krista Torralva covers several school districts and public universities in the San Antonio and Bexar County area. Read her on our [free site, mySA.com](#), and on our [subscriber site, ExpressNews.com](#). | Krista.Torralva@express-news.net | Twitter: [@KMTorralva](#)

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Published on Wednesday, February 20, 2019

Pre-K 4 SA Partners with Edgewood ISD

For Immediate Release

Contact: Jill Byrd, Creative Noggin
jill@creativenoggin.com | 210.501.4288

February 19, 2019

Gardendale Elementary first to replicate the Pre-K 4 SA proven program on-site

SAN ANTONIO — Pre-K 4 SA and Edgewood Independent School District formalized a partnership to leverage state funding and create a capacity building program at Gardendale Elementary School, following approvals from both boards today. The innovative SB 1882 partnership is designed to create greater capacity for high-quality early childhood education in prekindergarten through second grades in the partner school district.

Pre-K 4 SA has worked side by side with Edgewood ISD administration and teachers to develop a plan for replicating Pre-K 4 SA's proven practices in Gardendale classrooms. The collaboration is building upon existing processes to create a model that is both sustainable and replicable throughout the district.

"This partnership is another step toward Pre-K 4 SA's long-term mission to positively impact early childhood learning across San Antonio," Pre-K 4 SA CEO Sarah Baray said. "This partnership creates greater access to high-quality, innovative curriculum and helps provide additional seats for the 25,000 four-year-olds in San Antonio."

The Gardendale Pre-K 4 SA Early Learning Program will offer prekindergarten and kindergarten under the professional guidance of Pre-K 4 SA beginning in August of the 2019-2020 academic school year as made possible by state funding available through the SB 1882 partnership. First and second grade classrooms will be added the following year. Priority enrollment will be offered to families within the Gardendale Elementary School boundaries, followed by families within the Edgewood district. Remaining seats will be offered to out-of-district families.

"As a partner school district, Edgewood ISD has seen first-hand the positive impact of Pre-K 4 SA by benefiting from its Competitive Grants Program and Professional Learning Department," Edgewood ISD Superintendent Eduardo Hernández said. "Studies have shown the success of Pre-K 4 SA's model education centers and highlighted the long-term, positive effects of high-quality instruction in pre-k through third grade classrooms across San Antonio. We see this collaboration with Pre-K 4 SA as a critical step to amplify results for children in our district and throughout our city."

In total, the partnership will support three prekindergarten classrooms and four kindergarten classrooms at Gardendale in the upcoming academic year. The classrooms will mirror the appearance used at Pre-K 4 SA's award-winning education centers.

"Pre-K 4 SA is delivering on our commitment to the citizens of San Antonio that approved our program in 2012," Pre-K 4 SA

Board Chair Elaine Mendoza said. "This is an extension of our six year partnership with Edgewood ISD which even today provides professional learning and grants to improve early childhood learning taking place outside of our centers."

About Edgewood Independent School District

Edgewood ISD Mission Statement: Edgewood ISD provides an exceptional learning experience that engages, empowers and prepares students to compete and reach their highest potential in an ever-changing world Edgewood ISD Vision: For every child, success. Edgewood Proud!

www.eisd.net

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Texas Partnerships (SB 1882)

For More Information Visit: [TxPartnerships.org \(https://txpartnerships.org\)](https://txpartnerships.org)

Overview

Senate Bill 1882, signed into effect by the Texas Legislature in 2017, provides incentives for districts to contract to partner with an open-enrollment charter school, institutions of higher education, non-profits, or government entities. These incentives include:

- A potential increase in state funding for the partnered campus. Each partnered campus that meets eligibility requirements is entitled to receive the greater of either the amount of state funding to which the district would be entitled or the amount of state funding to which an open-enrollment charter school would be entitled. To estimate the amount for a specific campus, use the State Aid Template (<https://tea.texas.gov/sites/default/files/State%20Aid%20Template%202019-20%20and%202020-21%20Biennium%20version%203.4.xlsx>).
- An exemption from certain accountability interventions for two years. Specifically, the agency may not impose that the campus prepare and submit a turnaround plan, as outlined in TEC §39A.101(a), appoint a board of managers, as outlined in TEC §39A.111(1), and/or close the campus, as outlined in TEC §39A.111(2).

The bill states that to be eligible to access the benefits described above, **the partnered campus must be granted a charter under Subchapter C, Chapter 12.**

To be eligible for the benefits of SB 1882, the district may partner with two types of entities to operate the charter:

- A State-Authorized Open-Enrollment Charter School in good standing. State-authorized open-enrollment charter schools are also known as Subchapter D open-enrollment charters. To be eligible for the benefits associated with SB 1882 the open-enrollment charter partner may not have been previously revoked and must have received acceptable academic and financial accountability ratings for the three preceding school years.
- On approval by the Commissioner, other entities. These other entities include institutions of higher education, non-profits, or government entities that have been granted a charter under Subchapter C, Chapter 12.

Texas Partnership Benefits Application

To receive benefits beginning in the 2020-2021 school year, districts complete the following steps:

Submit a Letter of Intent to Apply for Texas Partnerships (SB 1882) Benefits	Nov. 15, 2019 (5PM Central)
Attend District Training	Dec. 13, 2019 or Jan. 17, 2020 (10AM Central)
Proposed or Potential Operating Partner Attends Training	Jan. 24, 2020 or Feb. 7, 2020 (10AM Central)
Submit 2019 - 2020 Texas Partnership Benefits Application (https://txpartnerships.org/wp-content/uploads/2019/12/APPLICATION-Texas-Partnership-Benefits.docx)	Apr. 30, 2020 (5PM Central)

Texas Partnership Guide

Districts should download the 2019 - 2020 Texas Partnership Guide (<https://txpartnerships.org/wp-content/uploads/2019/12/RESOURCE-Texas-Partnerships-Guide.docx>) for more information regarding the partnership benefits application process, relevant deadlines, and applicable resources.

Current Texas Partnerships

Districts receiving benefits under SB 1882 (including the partnered campuses and partner organizations) can be found on the Current Texas Partnerships list (<https://txpartnerships.org/wp-content/uploads/2020/01/Current-Texas-Partnerships-2019-2020.pdf>).

Important Information

Texas Partnerships Website

Please visit [TxPartnerships.org](https://txpartnerships.org) (<https://txpartnerships.org>) for more information regarding Texas Partnerships. The website provides a set of resources and tools to assist districts with developing partnerships and applying for benefits. This information includes relevant grant and fellowship opportunities in addition to model and required partnership materials.

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Housing as a Platform for Improving Education Outcomes among Low-Income Children

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Introduction

Researchers and policymakers hypothesize that housing can be a platform for academic achievement among low-income students—that is, high-quality, affordable housing, located in safe neighborhoods can go *beyond* providing basic shelter and stability, and can help provide a stable environment where children access high-performing schools, learn, and succeed academically. Most of the empirical evidence to date, however, focuses on the *absence* of high-quality, affordable housing and its consequences for children. There is a dearth of research on how housing can be a *positive* pathway to achieving better school outcomes. Further, methodological limitations plague research on both the negative and positive effects of housing and school outcomes, making it difficult to draw conclusive findings.

To help inform policymakers and move policy forward, this paper discusses the current state of housing in the United States, provides a conceptual framework for housing as a platform to improve educational outcomes for children, reviews the existing evidence that supports conceptual models, and identifies the major gaps in research. Finally, it proposes a list of projects that make up a research agenda for understanding the issue and guiding investments in new research.

Meeting Basic Needs: The Current State of Housing in the United States

The federal government has focused on improving housing for U.S. households since the introduction of the Housing Act of 1937 and the subsequent 1949 Housing Act, which articulated the goal of “a decent home and suitable living environment for every American family” (P.L. 87-71, Sec.2, as cited in Newman 2008). While “a decent home and suitable living environment” is often thought of as one package, it is made up of many different dimensions—including housing stability, affordability, quality, and neighborhood location.¹ All these dimensions may matter in different ways for meeting children’s basic needs and helping them achieve positive educational outcomes. Since Congress passed these pieces of legislation, housing policies and programs have led to vast improvements in some dimensions of housing, while other dimensions have fallen seriously behind.

Housing quality, though still a problem for some, has improved significantly since the 1940s, when lead paint, lack of plumbing, and shoddy and aging buildings were commonplace (Turner and Kingsley 2008). Slum removal, large investments in assisted housing, and strict enforcement of housing codes have improved housing quality overall. While these improvements have been significant, about 3.2 million households still live in severely or moderately inadequate housing (i.e., problems with plumbing, heating, electricity, maintenance, and overcrowding) in the private market (U.S. Department of Housing and Urban Development [HUD] 2005). And with no or limited funding for capital improvements, many households living in publicly assisted housing experience substandard housing quality (HUD 2011b).

More recently, affordability and the closely linked problem of residential stability have been the most significant housing challenges facing policymakers. The deep, long-lasting economic crisis and unprecedented problems with housing foreclosures have had major repercussions for the housing

¹ Newman (2008) refers to a housing package as a “housing bundle.” Although we define a housing bundle differently than Newman, we use this label to describe the sum of different dimensions of housing.

situations of low-income families. Homelessness and doubling up is increasing among families with children.² The U.S. Department of Housing and Urban Development (HUD) reports that homelessness among people in families has increased 20 percent, from 473,541 in 2007 to 567,334 in 2010 (HUD 2011a). Today, among homeless students identified by schools, nearly two-thirds (65 percent) are doubled up; 21 percent are living in homeless shelters; 7 percent are living in hotels or motels; and 7 percent are unsheltered, sleeping in places not meant for human habitation (National Center for Homeless Education 2011). While reliable data on doubled-up households are hard to find, schools across the nation report that the number of students living in doubled up housing situations has grown from 502,082 in 2008 to 668,024 in 2010—a 32 percent increase (National Center for Homeless Education 2011).³

Nearly 2 million children are living in homes going through foreclosure as a result of subprime-related foreclosures alone (Lovell and Isaacs 2008). Generally, the effects of foreclosure on children are unknown. One concern, however, is that households going through foreclosure will experience residential instability that will negatively affect members of the household, particularly children, who may be uprooted from their neighborhood, friends, and schools. How do moves caused by foreclosure affect children? Evidence from New York City and Washington, D.C., finds that students affected by foreclosure change schools more often than they would have otherwise and that the schools they transfer to are of lower academic quality, as measured by test scores (Been et al. 2011; Comey and Grosz 2011).

Even before the economic and foreclosure crises, housing affordability has been a problem that policymakers have largely ignored. The rent burden among low-income households has become worse over time: the Joint Center for Housing Studies of Harvard University (2011) finds that the share of severely burdened renters, or those paying more than 50 percent of their income for housing, increased from 20.7 percent to 26.1 percent between 2001 and 2009. Today, the affordable housing shortage is estimated to be 6.4 million units. As Crowley (2003) notes, the availability of affordable housing for low-income households has shrunk significantly in the past two decades as a result of “gentrification, conversion, demolition, and abandonment.” As the availability of affordable housing on the private market has declined over time so has the availability of housing subsidies: only one in four households eligible for housing subsidies actually receives assistance (Turner and Kingsley 2008).

Affordability, in many ways, influences residential instability. Families that cannot afford their rent may miss payments and face eviction. In tight housing markets, where obtaining an affordable housing unit is fiercely competitive, low-income families often experience high rates of “churning” from one apartment to the next, as they search for more affordable units. Of course, households move for various reasons, and housing mobility can be positive (e.g., moving to a better housing unit or better neighborhood, or

² “Both HUD and ED take homelessness to mean children who ‘lack a fixed, regular, and adequate nighttime residence’ due to the lack of alternative accommodations; are living in emergency or transitional shelters; are abandoned in hospitals or awaiting foster care placement; or are living in cars, parks, public spaces, abandoned buildings, or other places not ordinarily used as a regular sleeping accommodation for human beings. But the ED definition differs from the HUD definition in that it includes children living in households that are temporarily doubled up due to hardship or loss of housing and migrant workers and their children who are living in the conditions described above. It also includes children who are temporarily living in motels” (Cunningham, Harwood, and Hall 2010).

³ The reliability of these data varies significantly from school to school and it is unclear if these numbers are increasing due to real increases in doubled up students or better counting methods.

purchasing a home) or negative (e.g., moving because of eviction or problems making the rent). Low-income households experience high rates of housing mobility, often for negative reasons (Coulton, Theodos, and Turner 2009; Crowley 2003). For example, the Making Connections Initiative, a 10-city survey of low-income households, finds that 46 percent of those who moved during the study period were “churning movers,” suggesting that their moves were “a response to financial stress or problems in their rental housing arrangements” (Coulton et al. 2009, 12). These frequent moves can lead to frequent school changes.

Where housing is located also matters for children since where households live is inextricably linked to where they attend school. Overcoming the history of residential segregation in the housing market and improving neighborhood outcomes for low-income households has been a major challenge for policymakers. Discrimination in the housing market persists today (Ross and Turner 2005). Minority households are more likely to live in high-poverty tracts with low-quality schools (Galvez 2010; Newman and Schnare 1997; Orfield and Lee 2005). Households that receive housing assistance or public housing are also highly concentrated in poor neighborhoods (Turner, Popkin, and Rawlings 2008). Drug and gang violence plague these neighborhoods, making safety a major concern. School quality is an issue. Most children living in high-poverty neighborhoods attend lower-quality schools than their middle-class counterparts (Orfield and Lee 2005).

While all children are assigned default public schools based on neighborhood location, many students have other schooling options. In 2007, half of students had parents who reported that public school choice was available to them, although only 27 percent of students were enrolled in a school other than their assigned public school. Though this percentage has grown from 24 percent in 1996, among low-income children it has remained constant at 22 percent over this period, despite recent charter school growth (Grady, Bielick, and Aud 2010).

The Current State of Education for Low-Income Children

Although test scores for all students have risen over the past decade, poor children still lag behind their wealthier classmates. Reading and math scores for 4th and 8th grade students qualifying for free lunch were 9 to 12 percent lower on average than students that did not qualify for any lunch subsidies, roughly equivalent to the gap observed in 2003 (National Center for Education Statistics 2011a, 2011b). 10.8 million children (25 percent) age 5 to 17 lived in households with incomes below the federal poverty level (FPL) in 2010 (American Community Survey 2010). Using a slightly different measure of poverty, 43 percent of 4th graders and 39 percent of 8th graders qualified for free school lunch (meaning their family’s income was below 130 percent of FPL) during the 2010–11 school year, and 5 percent of both groups qualified for reduced-price lunch (family income below 185 percent of FPL).

While the free lunch measure of poverty provides an average for all children in families earning below 130 percent of FPL, it masks significant variation in the low-income population. Children in families earning between 50 and 100 percent of FPL perform worse than children from near-poor households, and children in families earning below 50 percent of FPL typically score twice as far below children from near-poor households than those earning 50–100 percent of FPL (Lacour and Tissington 2011). Students in subsidized housing and homeless children perform similarly poorly. Fifty-four percent of homeless children score below grade level in math, and 75 percent score below grade level in reading. In addition, this particular population is four times more likely than other children to score at or below the 10th percentile in reading (Hart-Shegos 1999). In education literature, typical effect sizes measure

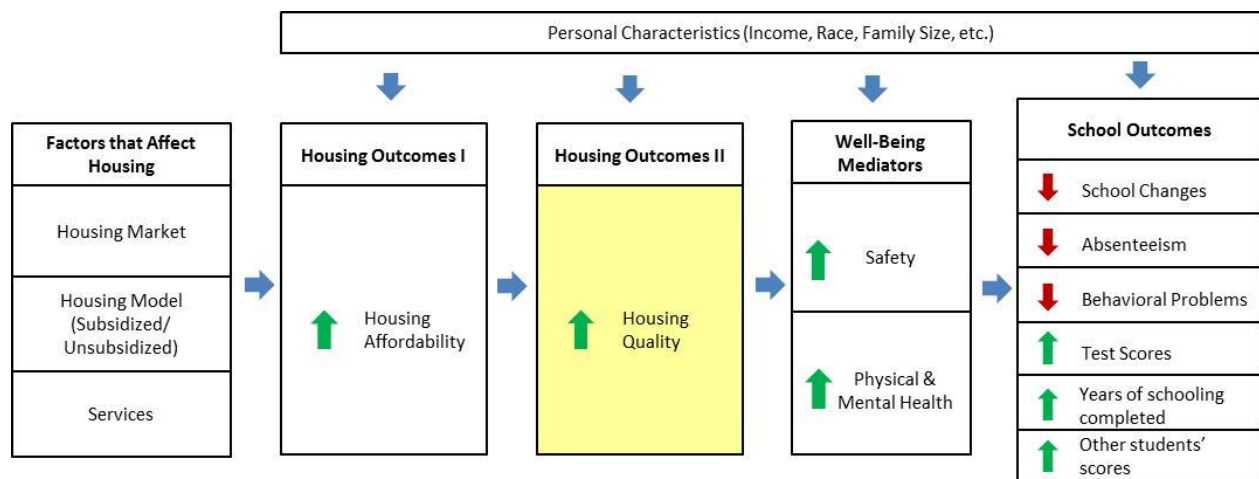
approximately one-tenth of a standard deviation for improvements in teacher quality or cognitive ability (H. Schwartz 2009). Against this backdrop, students living in New York City public housing score on average 0.31 standard deviations below the citywide mean in math and 0.33 standard deviations below the citywide mean in reading (A. Schwartz et al. 2010).

Test scores from early childhood evaluations and high school dropout rates reveal a similar pattern of academic achievement for low-income students. Low-income kindergarten students score around the 30th percentile on the Early Childhood Longitudinal Study reading assessment, while upper-income students score in the 70th percentile (Lacour and Tissington 2011). And although the dropout rate for students from low-income families (8.7 percent) has fallen slightly over the past decade, it is still more than four times greater than the dropout rate for students from upper-income families (2.0 percent) (Chapman, Laird, and KewalRamani 2010).

Housing as a Platform to Improved Education Outcomes for Children

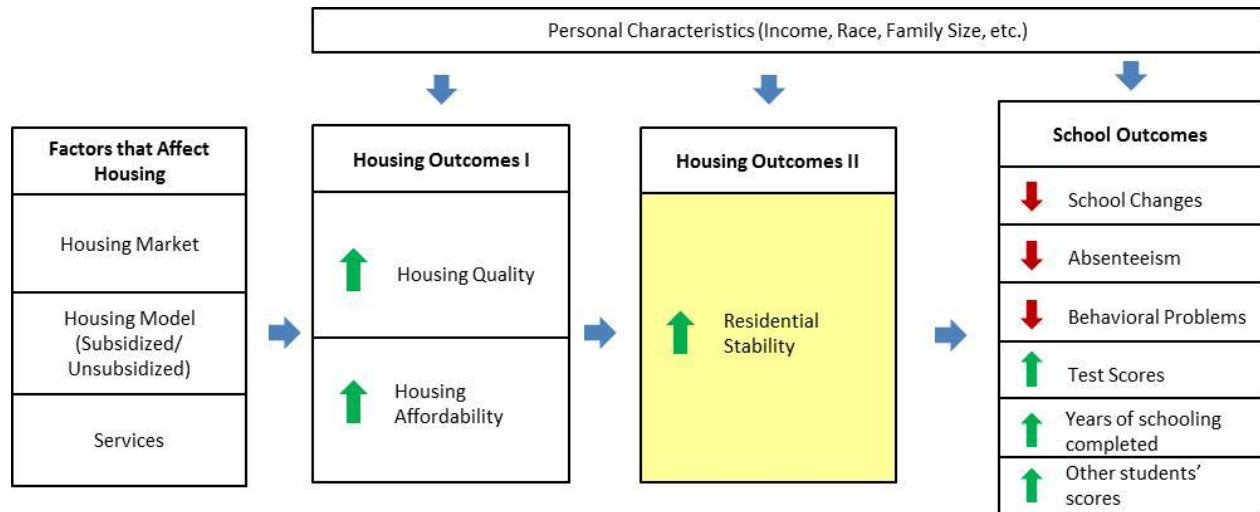
While many factors affect school outcomes among low-income children, including parental involvement and school quality, researchers hypothesize that meeting children’s basic housing needs is a critical part of school readiness and academic success. As noted above, different dimensions make up a housing “bundle,” and before understanding how housing affects school outcomes for children, researchers must “unbundle” these dimensions. Many researchers have hypothesized and measured how housing affects educational outcomes.⁴ The following diagrams provide conceptual models and hypotheses for how housing can create positive pathways toward children’s educational success. As the models note, we focus on four housing dimensions that may affect outcomes: housing quality, residential stability, housing affordability, and neighborhood location. These mechanisms affect school outcomes in different ways and, importantly, often interact with each other:

- *Housing quality* (often affected by housing affordability) can positively affect children’s safety and health outcomes, leading to better school attendance rates and improved attentiveness in class. Living in a housing unit that comfortably accommodates all members of the household provides a stress-free environment in which children can accomplish homework assignments.

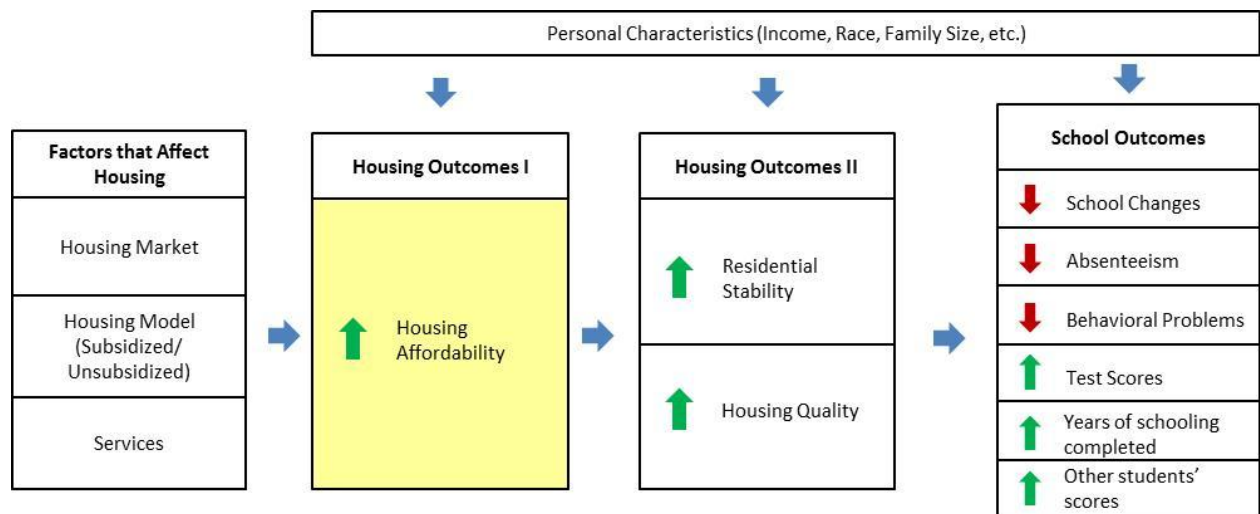


⁴ For previous reviews see Brennan (2011) and Newman

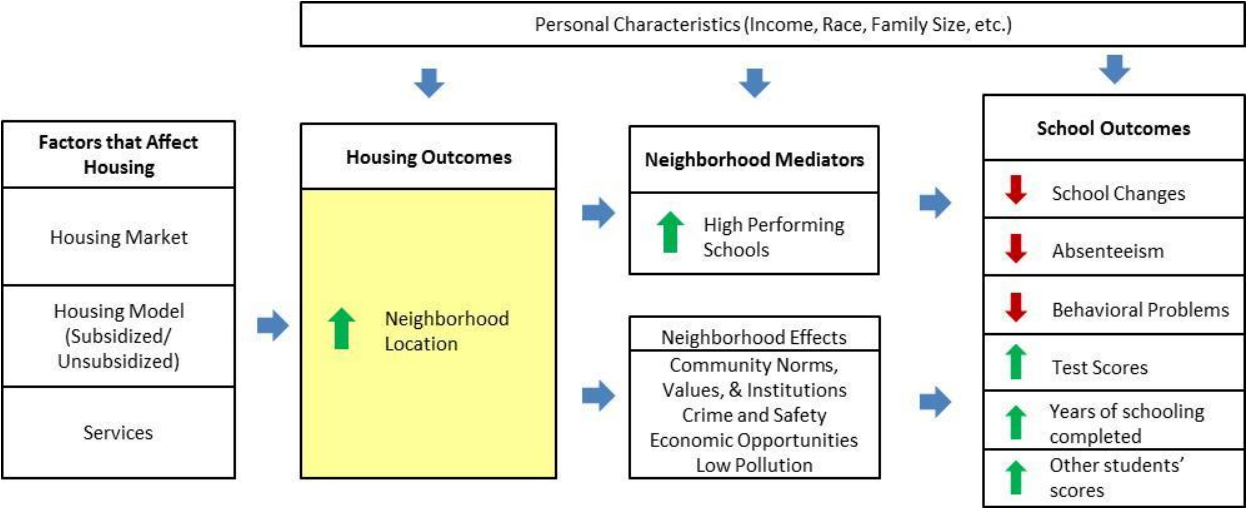
- *Residential stability* (often affected by housing quality and housing affordability) can lead to an uninterrupted school year, avoid disruptions at home caused by an unplanned move, and lead to fewer school changes that leave children behind academically.



- Since housing is the biggest expenditure in household budgets, *affordable housing* can provide families with financial security, leading to improvements in housing quality and residential stability; these improvements lead to better school outcomes, as noted above.



- Housing in a safe and healthy *neighborhood location* can improve household access to high-performing schools that lead to improved academic outcomes. Factors independent of school quality, such as community norms and values, day care availability, and safety may also lead to improved educational outcomes in a good neighborhood.



To gauge the impact of housing on children’s educational outcomes, researchers must define not only housing quality, but also the dimensions of school quality, and measuring school outcomes is just as difficult. Typically, student test scores are used a measure of school quality, but researchers, parents, and government officials each have their own definitions for the components of a quality educational institution. Most define quality schools “as having higher teaching quality, greater educational resources, more rigorous course offerings, smaller class sizes, and a school climate that values learning and achievement and holds high expectations for students” (Darling-Hammond 1996 as quoted in Sanbonmatsu et al. 2011). Parents agree with certain aspects of this definition and are silent on others. In a series of nine focus groups, D.C. parents most often cited curriculum and programs, school safety, school resources, location, and teacher quality as the most important aspects of a good school. Only a few parents mentioned student body test scores as a major factor (Filardo et al. 2008). However, in a study of 20 states that publish school ratings and other measures, researchers found that, although schools reported on school inputs such as school resources, and a select few reported on school processes, school accountability measures were exclusively defined by test scores, dropout rates, or course-taking (H. Schwartz et al. 2011).

The Impact of Housing on School Outcomes: What the Research Says

What does the research say about these hypotheses? Most research focuses on the absence of housing and its negative consequences for children’s school outcomes. There are a few ways that inadequate housing may affect school outcomes, as measured by accessibility to high-quality schools, attendance, and academic achievement (i.e., school test scores). First, researchers posit that children who experience homelessness or are living in overcrowded, doubled-up situations may lack the necessary tools to do well in school (Dworsky 2008). For example, overcrowded shelters may be noisy and chaotic, interfering with children’s ability to complete homework assignments; children may have to share common space and have inadequate workspaces or access to school supplies. Further, parents

experiencing homelessness or residential instability may not be able to prioritize helping children with their homework or be involved in school activities (Cunningham, Harwood, and Hall 2010). Conley (2001) analyzed the Panel Study of Income Dynamics and found that after controlling for family characteristics, children living in overcrowded conditions completed less schooling than their counterparts.

Health problems related to housing quality may affect school attendance, putting children behind in schoolwork and lowering academic achievement. The evidence shows that families living in low-quality housing, particularly children, may suffer severe health consequences. For example, low-income children living in deteriorated public housing, with infestations of cockroaches, mice, and mold, suffer from high rates of asthma (Howell, Harris, and Popkin 2005). Research shows that lead poisoning, an attribute of low-quality housing, is associated with developmental delays and poor educational outcomes (Moonie et al. 2008; Bellinger and Needleman 2003; Lanphear et al. 2000). These health problems can lead to high rates of absenteeism, which is linked to poor educational outcomes. As Kinney and colleagues note (2002), “asthma is one of the leading causes of absences from school.” Health problems may also lead to inattentiveness in the classroom, leading to poor grades and test scores. However, much of the literature that links housing, health, and poor educational outcomes only proves correlation, not causation, and suffers from selection issues. It is unclear if poor educational outcomes are *caused* by housing-related health problems or from other family characteristics (e.g., poverty, etc.), making it difficult to clearly establish causality. For example, a study that examined school outcomes for families living in public housing against those in privately owned assisted housing and those eligible for assisted housing but not receiving housing assistance found that after controlling for demographic and family background, the differences in outcomes between the groups disappear (Newman and Harkness 2000). The authors note that “educational outcomes are unaffected by whether a child ever lives in public housing, the duration of the residence, and the stage of childhood in which he or she lives there. These results show that it is the more disadvantaged family background of children who live in public housing, in particular lower levels of earnings, parental education, and economic self-sufficiency, which lead to worse educational outcomes, not public housing itself.”

Residential instability may also lead to absenteeism and school changes. The research on school attendance is mixed: some studies find that homeless children have higher rates of absenteeism than housed children, while other studies find no differences (Zima, Wells, and Freeman 1994; Rubin et al. 1996; Buckner, Bassuk, and Weinreb 2001). Residential instability, in many cases, clearly causes frequent school changes. In one study of Chicago elementary school students, only half remained enrolled in the same school over three years, and the majority of school moves were as a result of residential moves (Kerbow, Azcoitia, and Buell 2003). Students who changed schools frequently lag behind their non-mobile students by a year or more in reading and math, and half of this difference can be attributed to mobility (Garriss-Hardy and Vrooman 2005). Low-income families, generally, have high mobility rates (Coulton et al. 2009). Low-income students attending inner-city schools are more likely to change schools frequently: over 17 percent of all third graders have changed schools more than three times, and frequent movers are more likely to have repeated a grade or have low reading scores (GAO 1994; Garriss-Hardy and Vrooman 2005). As the data on children affected by foreclosure indicate, families affected by foreclosure move and change schools more frequently (Been et al. 2011; Comey and Grosz 2011). These school changes may demand the child adapt to a new curriculum and new teacher, and may often require the child to make up schoolwork covered earlier in the year. Further, as Obradovic and colleagues (2009) note, highly mobile students are at risk for “broken bonds” with teachers that may disadvantage those needing the most help in the classroom.

In fact, *all* students suffer in a school with a large population of highly mobile students. Research shows that review and catch-up work become the norm in high-mobility schools, and lessons often stall at elementary skill levels. Teacher morale may be poor as a result, leading to high teacher turnover and an influx of inexperienced teachers (Rhodes 2006). By fifth grade, the curricular pace at schools with highly mobile populations is so different from more stable schools that the math curriculum is typically one grade below grade level (Kerbow et al. 2003). As a result, students perform poorly on standardized tests (Kaase 2005).

One way to decrease residential mobility is through housing subsidies. Research from HUD's Welfare to Work Voucher experiment found that housing vouchers reduce residential mobility, but it is unclear if residential *stability* resulted in better school outcomes since the analysis did not examine outcomes beyond basic housing (Gubits, Khadduri, and Turnham 2009; Mills et al. 2006). More research is needed to understand if these voucher families have improvements in school outcomes as well.

Beyond the stability of the housing unit, the neighborhood location and proximity to high-quality schools may also matter. However, as evidence from the Moving to Opportunity Demonstration (MTO) shows, merely moving families to better neighborhoods may not translate into access to better schools. As Ferryman and colleagues (2008) note, many families who had a chance to switch school districts kept their children enrolled in the pre-move neighborhood schools. Qualitative data suggests that many MTO families were "information poor" and did not make school choices the way middle-class families often do. MTO families reported that neighborhood safety was the first priority when deciding where to live and that safety is the mark of a good school (Ferryman et al. 2008). Despite these challenges, research suggests that getting low-income children into high-performing schools could improve school outcomes. A recent study shows that low-income children who attend schools with middle- and upper-income children do better academically (H. Schwartz 2009).

Finally, housing affordability may lead to low-quality housing and residential instability. The lack of affordable housing can lead to difficult choices in household budgets—for example, choosing between paying the rent or paying for food and other necessities like adequate health care. Families with affordability issues may choose lower quality housing to make up for the gap in income. Financial trouble may also negatively affect children's academic performance and behavioral development (Pribesh and Downey 1999). However, there is some evidence that high-priced housing is not linked to negative long-term outcomes. An analysis of the Panel Study of Income Dynamics finds that "children growing up in higher-priced markets appear to fare no worse than those in lower-priced markets" (Harkness, Newman, and Holupka 2009, 123). These households may be "buying" into better neighborhoods and, thus, better schools. These types of decisions may create positive tradeoffs: by improving the neighborhood location dimension of housing (and therefore increasing the quality of the school attended) and decreasing the affordability dimension, children may experience positive outcomes.

Academically, some studies have found that homeless and highly mobile students score lower than stably housed children do on standardized tests in reading, spelling, and math (Obradovic et al. 2009; Rafferty, Shinn, and Weitzman 2004; Rubin et al. 1996). These differences remain even after controlling for poverty and other stressors. For example, Rubin and colleagues (1996) compared 102 homeless children with 178 housed children and found, controlling for differences in socioeconomic status and demographic characteristics, that homeless children scored lower on tests of reading, spelling, and math proficiency. While this study offers the best evidence of the independent effects of a lack of housing on children's academic success, there still may be unobserved differences between the level of

disadvantage of families who end up homeless and those who do not; further, the study does not explain which dimension of housing is driving the improved outcomes. Is it the frequent moves, school changes, or disruptions in the home that cause these differences?

Common Methodological Challenges in the Research Base

Most studies that examine the impact of housing on children’s education outcomes are plagued by methodological limitations. A few limitations stand out in the literature:

- **Studies do not adequately control for family characteristics and selection issues.** Selection bias can affect research on the impact of housing in two different ways. First, it may cause researchers to overlook differences in outcomes that may exist. For example, many studies show mixed results when it comes to understanding the independent effects of the absence of adequate housing (Buckner 2008; Newman 2008). This is because, as many researchers note, it is difficult to disentangle the effects of poverty from those of inadequate housing and homelessness. This same condition may cause researchers to erroneously attribute school outcomes to housing situations, when those outcomes are actually caused by family characteristics. Since most studies do not use experimental or longitudinal designs that would overcome selection issues and omitted variable bias, selection bias remains problematic.
- **Studies do not “unbundle” housing dimensions.** As noted earlier, a housing “bundle” is made up of several different dimensions, and these dimensions may affect school outcomes in different ways. To understand the impacts of housing and design responses to the problem, policymakers need more nuanced information on the “what” and the “how.” What is causing the negative outcome? How is that factor causing it? Of course, housing policy should strive to ensure that all dimensions of housing need are met, but each is costly to attain, so knowing which dimensions will achieve the most benefit is critical. Are there dimensions of housing that are more important to achieve? What are the tradeoffs? Is residential stability more important than housing quality or affordability? Is it enough to provide neighborhood location (and therefore access to high-quality schools) but not maximize affordability?
- **Studies do not fully measure housing along those different dimensions.** Many studies examine housing as a dichotomous variable: children are either housed or homeless. However, homelessness is just one end of the inadequate housing spectrum—the worst possible outcome. Even if children do not become literally homeless, as noted above, many low-income families experience substandard housing, affordability problems, and residential instability—all of which may affect children’s education outcomes. The duration of these conditions may also matter. As Rog and Buckner (2007) note, “homeless episodes are typically part of a long period of residential instability, marked by frequent moves, stays in one’s own housing, and doubling up with friends and relatives.” Families move in and out of these circumstances, and they may appear stable at one point in time but experience inadequate housing in others. They may, for example, live in low-quality housing or overcrowded units. Thus, many studies that compare homeless children to other low-income housed children may in fact be comparing homeless children to low-income, *inadequately* housed children.
- **Studies do not adequately describe housing models.** Another challenge with understanding the difference in outcomes among children who are adequately or inadequately housed is highlighting the differences among and within housing models. For example, some public housing may be

distressed, while other developments may offer healthy, safe neighborhoods with high-quality units. Similarly, some private-market housing may offer high-quality units in neighborhoods with high-performing schools, while others may be located in unsafe neighborhoods with substandard housing quality. Private-market housing may look similar or quite different from public housing. Put simply, not all assisted housing or private-market housing is the same, and capturing the condition of the housing along different dimensions is important for interpreting the results of the study.

- **Studies do not explore alternative dimensions of school quality.** The majority of studies attempting to link housing and educational outcomes invariably focus on test scores or graduation rates. However, researchers, parents, and educators may have alternative definitions for the components of a quality education that may include, but are not limited to, social and behavioral outcomes and college readiness (Filardo et al. 2008; H. Schwartz et al. 2011). Understanding how housing interacts with alternative measures of school quality would help researchers and policymakers understand the broader range of educational benefits and costs mediated by housing.

Plan for Future Research

The purpose of creating a research agenda is to inform government agencies, foundations, and other stakeholder organizations about research questions that will help move policy and practice forward. Prioritizing questions will help focus investments and stimulate the interest of researchers from academic and research organizations, ensuring that research undertaken is policy relevant. To optimize the value of research findings, research designs should include rigorous data collection strategies, including quasi-experimental and experimental designs where appropriate. Research should also include qualitative data collection strategies that help understand program design, implementation, and cost analyses that provide data to policymakers so they can weigh costs and benefits of different program and policy approaches. Drawing on the evidence outlined in this framing paper, three areas deserve attention:

- **Understanding the what and the how.** As is clear from our review of the evidence, understanding the impact of housing on school education outcomes is still incomplete. Specifically, researchers have not unbundled different dimensions of housing to understand the “what” and the “how.” These questions are not merely academic. To prioritize where to invest “housing dollars,” policymakers must know if one housing dimension is more important than another for school outcomes. More research is needed in this area.
- **Testing the efficacy of shallow housing subsidies.** Research shows that providing housing subsidies to families can protect them against homelessness and provide residential stability (Khadduri 2008; Wood, Turnham, and Mills 2008). Considering the current budget environment, it is unlikely that Congress will significantly increase funding for housing vouchers— though advocates should continue to push for this evidence-based program. Meanwhile, policymakers must learn how to do more with less. While it is still an open question, providing a shallow subsidy to families that require less assistance may help keep them stably housed and protect them against unforeseen circumstances, such as health issues or job loss. Researchers need to rigorously evaluate the impact of shallow subsidies and other subsidy structures to understand if they are effective.
- **Linking housing more closely to high-performing schools and helping families make positive choices when searching for housing.** Research shows that low-income children who attend schools with middle- and upper-income children do better academically (H. Schwartz 2009). The data

indicate that without a purposeful intervention, low-income children will meet numerous barriers accessing high-performing middle- and upper-income schools. As MTO reveals, even helping families move to lower-poverty neighborhoods may not result in positive school changes for children (Ferryman et al. 2008). Despite powerful evidence that low-income children are constrained by their low-performing neighborhood schools, housing policy and school policy operate in silos. As Turner and Berube (2009, 1) note, “Public policies have helped shape today’s disparities in neighborhood affordability and school quality...programs focused on affordable housing rarely take public schools into account and school officials typically assume that they have no influence over housing patterns.” Policymakers must do more to integrate housing and school policy. First, they must identify neighborhoods where high-performing schools are located and map the share of affordable housing in these neighborhoods. Second, policymakers can implement some changes immediately, like prioritizing placement of subsidized housing in neighborhoods with high-performing schools; improving housing and attracting middle-income families to neighborhoods with lower performing schools, with the goal of improving schools over the long term; and providing incentives to housing agencies for helping families move to these neighborhoods (Turner and Berube 2009). In addition, policymakers can provide funding for provision of early childhood education programs on site. Lastly, program interventions could be tested and further studied to understand their full impact. One such example is launching a demonstration project that provides housing vouchers to families to help them move to neighborhoods with high-performing schools and requiring households to switch to the new schools.

To understand more about these gaps in research, we suggest a few research projects in Table 1. The table provides research questions, descriptions of the research projects that would answer the questions, and incubator projects that would serve as a seed to getting the larger research project off the ground.

Conclusion

Research suggests that housing is not only critical for meeting children’s basic needs; it can be a platform for improving education outcomes. Further, devoting more resources to housing now that improve educational outcomes could lead to improved employment outcomes, thereby saving money and boosting national productivity. Much more research is needed to understand the how and the why, but the literature clearly demonstrates that some aspects of housing—residential instability and neighborhood location—affect education outcomes. In addition to the how and the why, policymakers lack research on policy interventions that either mitigate the effects of these housing dimensions or solve them. This paper provides a priority list of research questions that, if answered, can help inform policymakers to design potential solutions and go a long way toward connecting the dots between housing and school outcomes for low-income children.

Table 1: Research Questions and Potential Research Projects

Research questions	Research project	Incubator project
Does providing vouchers plus school-focused housing search assistance help low-income families access high-quality schools and help improve their children’s educational outcomes?	Launch an experimental demonstration, including cost analyses, that provides enhanced vouchers (vouchers plus school-focused housing search assistance) to low-income families.	Draft hypothesis, research design, and conduct a feasibility analysis.
For hyper-mobile families, what is the impact of shallow subsidies on residential instability and school outcomes? How does providing shallow subsidies to families in neighborhoods with high rates of mobility reduce churning and improve neighborhood outcomes?	Launch an experimental demonstration, including cost analyses, that provides a shallow subsidy to hyper-mobile families in neighborhoods with high mobility rates.	Review literature for research on the efficacy of shallow subsidies. Draft hypothesis, research design, and conduct feasibility analysis.
What are the key components of initiatives that link community development efforts and schools, including providing on-site childhood education programs?	Conduct a national scan of model programs, complete site visits and key informant interviews, and produce case studies.	Complete the scan and outline a typology for understanding core program dimensions.
What is the impact of housing on school outcomes? Which dimensions of the “housing bundle” are the most important when it comes to influencing school outcomes?	Analyze data from integrated databases to examine the impact of housing outcomes on school outcomes.	Draft a paper that investigates ways to use integrated databases to examine the impact of housing outcomes on education outcomes. The paper should specifically look at possibilities to unbundle housing dimensions and to use propensity score matching to create comparison groups.

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Exhibit B



February 27, 2019

Officers
2019-2022

Rudy Lopez
President
(210) 425-8445

Joey Cipriano
Vice-President
(210) 296-5317

Jason Martinez
Treasurer
(210) 343-9846

Secretary

Domingo Gutierrez
Sergeant at Arms
(210) 8787-6166

Raquel Castillo
Parliamentarian
(210) 685-9273

TAX ID #:
45-8742738

Holly Thoman,
As per our conversation

As the president of the Thompson Neighborhood Association and after a productive conference call with all the stake holders for this project it is of my opinion that the rehabilitation of the said property known presently as the Preserve at the Port would be in the best interest of our community. The rehabilitation of the apartments is to be performed by said Joey Guerra with the assistance of Dale Alaniz and Holly Thoman. In our discussion many items were discussed including a community center that would work in conjunction with the local school district to meet the needs of the children of the tenants that would be residing at the apartments.

As the president of the Thompson Neighborhood Association I and our executive team maintain a close working relationship with the superintendent Dr. Eduardo Hernandez and his staff including the principal of Winston Elementary Ms. Claudia Sanchez. We do realize that Winston Elementary has had its problems in the past two years. However after working together with the school district when seeking community input, I believe that the future goals of the district to improve each of its campuses will mean that Edgewood ISD will meet and surpass all expectations in the standards set forth by the TEA.

One example of that is that Winston Elementary will become a S.T.E.A.M (school of science, technology, engineering, arts and mathematics) carting to children from grades 3rd to 5th. I believe this will make Winston one of the premiere schools in the San Antonio area.

In closing I would like to give this project the blessings of the Thompson Neighborhood Association to move forward and to become an integral part on this community.

Sincerely,
Rudy Lopez, TNA President



The Senate of The State of Texas

Senator José Menéndez

District 26

April 27, 2020

Bobby Wilkinson
Executive Director
Texas Department of Housing and Community Affairs
211 E. 11th Street
Austin, Texas 78701

Dear Mr. Wilkinson,

I am writing to indicate my support for the rehabilitation of Preserve at the Port, a 384-unit development project located within my district near Port San Antonio. The rehabilitation of these units will bring much needed safe, quality affordable housing to the area and provide a living environment for students and parents that will contribute to students' academic excellence. Rather than perpetuate the problem by limiting the existing families' access to decent, safe housing, this project can be part of the solution.

Currently, educators at Edgewood Independent School District and Winston Elementary are implementing innovative solutions to improve and align vetted curriculum at schools across the school district.

By voting to approve the requested waiver for the proposed development, TDHCA will be voting to promote community revitalization, educational innovation, and quality of life for my constituents.

Thank you for your consideration in helping rebuild our community.

Sincerely,

A handwritten signature in black ink, appearing to read "José Menéndez".

José Menéndez
State Senator
District 26

CAPITOL OFFICE:

P.O. Box 12068
Austin, Texas 78711
(512) 463-0126
Fax: (512)-463-2114
1-888-279-0648

E-MAIL: jose.menendez@senate.state.tx.us

**Chairman Senate Hispanic Caucus
Committees: Administration • Business & Commerce • Higher Education
Intergovernmental Relations • Redistricting • Veterans Affairs & Border Security**

DISTRICT OFFICE:

4522 Fredericksburg Rd., Ste. A-22
San Antonio, Texas 78201
(210) 733-6604
Fax: (210) 733-6605



EDGEWOOD INDEPENDENT SCHOOL DISTRICT

5358 W Commerce St. San Antonio, Texas 78237 Phone (210) 444-4500 Fax (210) 444-4602 superintendent@eisd.net

Dr. Eduardo Hernandez
Superintendent of Schools

- ★ Focus on Student Success
- ★ Focus on Students, Families and Community
- ★ Focus on Operational Excellence
- ★ Focus on Employees & Organizational Improvement
- ★ Focus on Financial Stewardship

April 6, 2020

J.L. Guerra Jr.
Port SA Redevelopment LP
16607 Blanco Rd Suite
San Antonio, TX 78232

Re: Letter of Support – Preserve at the Port-Port SA Redevelopment LP

Dear J.L. Guerra Jr,

Edgewood ISD is dedicated to the children and families of our community The Mission of Edgewood ISD is to provide an exceptional learning experience that engages, empowers, and prepares students to reach their highest potential in an ever-changing World. Our commitment to this mission is reached not only through serving our students but also in serving the community in which they live.

Currently educators at Winston elementary are working hand in hand with curriculum coordinators and content coaches in order to improve and align vetted curriculum, hands-on engaging daily tasks and rigorous assessment. As a part of the districts overall plan to both transform and innovate each campus, beginning in August 2021 Winston elementary will be an intermediate grades three through five only campus. Winston lies within our steam innovation zone and educators at that campus will employ the New Tech project-based learning design model and incorporate elements of science technology engineering arts and mathematics into daily instruction.

It is my pleasure to support the Preserve at the Port. We believe in and fully support all the efforts to rehabilitate these units which will help revitalize our community.

Thank you for your consideration in this organization and helping rebuild our community.

Respectfully,

Dr. Eduardo Hernandez
Superintendent of Schools

★ **EDGEWOOD ISD Mission Statement** ★

Edgewood ISD provides an exceptional learning experience that engages, empowers, and prepares students to compete and reach their highest potential in an ever-changing World.

7e

BOARD ACTION ITEM
MULTIFAMILY FINANCE DIVISION
MAY 21, 2020

Presentation, discussion, and possible action on timely filed appeal of material deficiencies in HTC Applications 20040 Espero Austin at Rutland and 20041 Espero Austin at W. 24th under the Department's Multifamily Program Rules

RECOMMENDED ACTION

WHEREAS, the appeal relates to Competitive Housing Tax Credit (HTC) applications 20040 Espero Austin at Rutland and 20041 Espero Austin at W. 24th, which were submitted to the Department by the same Applicant and by the Full Application Delivery Date;

WHEREAS, staff determined that the Applications should be terminated because the Applicant did not provide sufficient evidence that the Applications meet the Supportive Housing requirement that the Developments will be supported by project-based rental or operating subsidies for 25% of the Units, and the Developments do not qualify as either Elderly or general, subject to the Applicant's ability to appeal;

WHEREAS, the Applicant timely filed an appeal; and

WHEREAS, the Executive Director denied the appeal;

NOW, therefore, it is hereby

RESOLVED, that the appeal for 20040 Espero Austin at Rutland and 20041 Espero Austin at W. 24th is hereby denied.

BACKGROUND

HTC Application 20040 Espero Austin at Rutland proposes the New Construction of 135 Units for a Supportive Housing population. The Development would be located in Austin and all 135 Units would be restricted. Application 20041 Espero Austin at W. 24th proposes the New Construction of 87 Units for a Supportive Housing population. The Development would be located in Austin and all 87 Units would be restricted.

Both applications are appealing a determination made by staff, and affirmed by the Executive Director, that not all of the requirements have been met that qualify the properties for the definition of Supportive Housing chosen by the Applicant. 10 TAC §11.1(d)(122) related to the definition of Supportive Housing, identifies the requirements for a Development to be considered Supportive Housing. Under 10 TAC §11.1(d)(122)(E):

(E) Supportive Housing Developments must meet the criteria of either clause (i) or (ii) of this subparagraph:

(i) not financed, except for construction financing, with any debt containing foreclosure provisions or debt that contains must-pay repayment provisions (including cash-flow debt). Permanent foreclosable, must-pay debt is permissible if sourced by federal funds, but the Development will not be exempted from Subchapter D of this chapter (relating to Underwriting and Loan Policy). In addition, permanent foreclosable, cash-flow debt provided by an Affiliate is permissible if originally sourced from charitable contributions or pass-through local government non-federal funds. Any amendment to an Application or Underwriting Report resulting in the addition of debt prohibited under this definition will result in the revocation of IRS Form(s) 8609, and may not be made for Developments that have Direct Loans after a LURA is executed, except as a part of an approved Asset Management Division work out arrangement; or

(ii) financed with debt that meets feasibility requirements under Subchapter D of this chapter without exemptions and must also be supported by project-based rental or operating subsidies for a minimum of 25% of all Units, and meet all of the criteria in subclauses (I) - (VIII) of this clause:

To meet the requirements of the selected clause (ii) above, each Application included an “Operating Subsidy Agreement” in which the Applicant made an agreement with itself to provide operating subsidies for a minimum of 25% of all Units. The appeal contends that the “Operating Subsidy Agreement” (hereinafter “the Agreement”) submitted with the Applications satisfies the rule.

It is staff’s interpretation that applications utilizing this subsection’s definition must demonstrate at full application a commitment of project-based rental assistance for 25% of the units from an external entity that is capable of committing project-based rental assistance for those units, or, alternatively, that such an external authority has committed its housing funding as an operating subsidy pledge to the development. Indeed, the term “external entity” is not in the rule; however, the concept is illustrative of the fact that Caritas is not capable of committing project based rental assistance or project based operating subsidies that meet Texas Administrative Code and Texas Government Code requirements.

The appeal generally questions staff’s interpretation that allows Supportive Housing developments without hard debt financing to include sponsor loans, but then in contrast not include operating subsidy agreements “in very near the same form” as the ones submitted with the Applications. However, the rule very intentionally has different definitions of Supportive Housing as it relates to the inclusion of hard debt. The debate and comment at the November 7, 2019, Board meeting focused specifically on the difficulty of obtaining the finite resource of vouchers for 100% of the units by the time of application. Relatedly, in response to the initial letter from Staff requesting an explanation as to how the Espero applications met the E(ii) definition, the Applicant responded:

While we would have liked to provide a singular voucher and/or subsidy commitment for each project to meet the 25% requirement, that reality

simply does not exist in our community. Our local Housing Authorities do not have an open voucher commitment dedicated to persons experiencing homelessness like other Texas Communities and have many less vouchers in total. Every voucher or operational subsidy available in our community is already being used and it is unrealistic to assume an agency would forward commit existing vouchers or operational subsidies to a project that is at least two years from opening its doors.

As the Applicant interprets the phrase “project-based rental or operating subsidies,” it appears they believe it means “project based rental subsidies or any other form of operating subsidy.” Accordingly, they interpret the phrase to allow an affiliate of the applicant to tender a contract to provide a benefit as later agreed upon.

The relevant portion of the Agreement states:

“2.1 **Operating Subsidy.** The purpose of the subsidy is to provide rental assistance to prospective affordable housing tenants . . . From time to time the Partnership and Caritas will agree upon a base amount of monthly Operations Subsidy necessary for the Subsidy Eligible Units of the Project, as budgeted by the Partnership. . . .”

The rationale of requiring parties that are not under common control to provide this type of project-based operating subsidy is clear from the terms of this Agreement: note that the agreement between Caritas and the Partnership does not specify an amount to be paid, but rather they “will agree upon a base amount of monthly Operations Subsidy necessary.” Considering that Caritas is the 100% owner of the Partnership, and that Tex. Gov’t Code §2306.6705(4)(A) requires the identification of the annual amount of funds in the subsidy, it seems unclear whether there actually is a subsidy, as contemplated by statute, in an agreement to agree as between an entity and its wholly-owned partnership.

This point is further demonstrated by section 1.3, which includes in the definition of “Operating Subsidy” any prospective project-based or tenant based vouchers that may be made available to the development or its tenants. Accordingly, as the development or its tenants accrue vouchers, there may come a point where even the annual amount of funds to be agreed upon by Caritas and the Partnership will decrease. This illustrates that this Agreement does not meet the common conception of a project based “operating subsidy” and it is closer to a guaranty agreement already required of Supportive Housing Developments in 10 TAC 11.1(d)(122)(B)(iv).

Staff does not interpret the rule to allow a private applicant to propose a Development be considered Supportive Housing with hard debt, while also pledging itself to financially provide the "operating subsidy." Therefore, staff determined that the applications do not meet the definition of Supportive Housing. Since the Developments do not meet the definition of Supportive Housing, to still remain a valid application, the Target Population would be required to be changed to either Elderly or general. However, the Developments do not meet threshold requirements to qualify for serving either of those populations, including but not limited to 10 TAC §11.101(b)(6)(A) related to Unit Sizes.

In responding to the appeal, the Executive Director noted the numerous letters of support for these applications from state and local officials, and expressed an important point: TDHCA Staff does not dispute that the City of Austin is in need of more supportive housing; nor does TDHCA question the noble mission or work of Caritas. The Executive Director's decision to deny this appeal was administrative, and based on what he saw as Staff's reasonable interpretation of this new rule. Accordingly, Staff recommends the Board deny the appeal.

20040 Espero Austin at Rutland
20041 Espero Austin at W. 24th
Termination Letter



TEXAS DEPARTMENT OF HOUSING AND COMMUNITY AFFAIRS

www.tdhca.state.tx.us

Greg Abbott
GOVERNOR

BOARD MEMBERS
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Asusena Reséndiz, *Member*
Sharon Thomason, *Member*
Leo Vasquez, *Member*

April 6, 2020

Writer's direct dial: (512) 475-1676
Email: marni.holloway@tdhca.state.tx.us

Jo Kathryn Quinn
Espero Austin at W. 24th, LP
P.O. Box 1947
Austin, Texas 78767

RE: APPLICATION STATUS FOR 20040 ESPERO AUSTIN AT RUTLAND AND 200411 ESPERO AUSTIN AT W. 24TH, AUSTIN

Dear Ms. Quinn:

TDHCA sent you a deficiency notice on March 18, 2020, requesting you provide an explanation of how your above-noted applications satisfied the requirements of 10 TAC §11.1(d)(122) related to the definition of Supportive Housing. In your response you indicated:

While we would have liked to provide a singular voucher and/or subsidy commitment for each project to meet the 25% requirement, that reality simply does not exist in our community. Our local Housing Authorities do not have an open voucher commitment dedicated to persons experiencing homelessness like other Texas Communities and have many less vouchers in total. Every voucher or operational subsidy available in our community is already being used and it is unrealistic to assume an agency would forward commit existing vouchers or operational subsidies to a project that is at least two years from opening its doors.

The definition of Supportive Housing selected by the Applicant (10 TAC §11.1(d)(122)(E)(ii)) is new to the 2020 round, and contains the phrase "must also be supported by project-based rental or operating subsidies for a minimum of 25% of all Units . . ." It is staff's interpretation of this definition that applications utilizing this subsection's definition must demonstrate at full application a commitment of project-based rental assistance for 25% of the units from an external entity that is capable of committing project-based rental assistance for those units, or, alternatively, that such an external authority has committed its housing funding as an operating subsidy pledge to the development. Staff does not interpret the rule to allow an applicant or affiliate to propose a Supportive Housing development under the new definition that allows for debt, and also be the source of the "operating subsidy" by a pledge of future funding.

Since the Development does not meet the definition of Supportive Housing, the Target Population must be changed to either Elderly or general. The Development does not meet threshold requirements to be



considered Elderly or general, and accordingly the Application is terminated, pending your right to appeal. As this "with debt" option for defining Supportive Housing is a new rule, and this is the first opportunity for the Board to interpret its rule, it is the prudent course for staff to more strictly apply the definition and allow the Executive Director and Board to provide its input should you choose to appeal.

An appeal process exists for the Housing Tax Credit Program. The restrictions and requirements related to the filing of an appeal can be found in 10 TAC §11.902 of the 2020 QAP. Should you choose to appeal this decision to the Executive Director, you must file your appeal, in writing, with the Department not later than seven (7) calendar days after the date of this letter. If you are not satisfied with the decision of the Executive Director or if the Executive Director does not respond, you may file a further appeal with the Board of Directors of the Texas Department of Housing and Community Affairs. Please review §11.902 of the 2020 QAP for full instructions on the appeals process.

If you have any questions or concerns, please contact me at 512-475-1676 or by email at marni.holloway@tdhca.state.tx.us.

Sincerely,

Marni

Holloway

Marni Holloway

Director, Multifamily Finance

Digitally signed by
Marni Holloway
Date: 2020.04.06
11:16:34 -05'00'

Appeal Documents

April 13, 2020

Via Email: bobby.wilkinson@tdhca.state.tx.us

Bobby Wilkinson, Executive Director
Texas Department of Housing and Community Affairs
221 East 11th Street
Austin, Texas 78701-2410

RE: Appeal of Terminations; TDHCA File Nos. 20040 and 20041;
Our File No. 52049.1

Dear Mr. Wilkinson:

This law firm represents Espero Austin at Rutland, LP and Espero Austin at W. 24th, LP (collectively, the “Applicants”), and I have been requested by Jo Kathryn Quinn, President and CEO of Caritas of Austin, Inc. (“Caritas”), to appeal the terminations of the respective Applications filed by Applicants for their projects, Espero Austin at Rutland and Espero Austin at W. 24th (collectively, the “Projects”).

The Applications for these Projects were terminated on the basis that the Applicants failed to satisfy the definition of Supportive Housing under 10 TAC §11.1(d)(122)(E)(ii) (the “Regulation”). In Marni Holloway’s letter dated April 6, 2020, to Applicants terminating their Applications, she states that the staff’s interpretation of the definition contained in the Regulation requires an applicant to have an “external authority” committed to funding an operating subsidy to the development. She further states, “Staff does not interpret the rule to allow an applicant or affiliate to propose a Supportive Housing development under the new definition that allows for debt, and also be the source of the ‘operating subsidy’ by a pledge of future funding.”

The entire text of the Regulation is as follows:

(ii) financed with debt that meets feasibility requirements under Subchapter D of this chapter without exemptions and **must also be supported by project-based rental or operating subsidies for all Units**, and meet all of the criteria in subclauses (I) - (VIII) of this clause. [Note: The Board approved on January 16, 2020 a waiver effectively reducing the requirement from all Units to a minimum of 25% of all Units.]

One reason why I disagree with Ms. Holloway’s and staff’s interpretation of the Regulation is that nowhere in the plain language of the Regulation does it state that an “external authority” cannot be an affiliate of the applicant. This is the situation we have in this instance. When the Applications were filed, Jennifer Hicks, the consultant for Applicants, submitted an Operating Subsidy Agreement from Caritas. Caritas is an “Affiliate” under the applicable definition in the

Bobby Wilkinson

April 13, 2020

Page 2

2020 Qualified Allocation Plan (the "QAP"). As an aside, the Operating Subsidy Agreement complies with Texas Government Code §2306.6705(4). I am unable to appreciate the basis for the termination of the Applications when the reason cited is that the Supportive Housing selected by Applicants fails to meet the definition set out in the Regulation. It appears staff has added an additional requirement to the Regulation clearly not in the Regulation. If neither the Regulation nor any of the remaining portions of 10 TAC §11.1(d)(122) mention "external authority," then it cannot be that an interpretation of the Regulations includes an additional condition that the "operating subsidy" must be provided by a source other than an Affiliate. Such an interpretation is clearly outside the plain language of the Regulation.

The Regulation is a new regulation which permits hard debt on a Supportive Housing project and it is understandable that a new regulation is subject to multiple interpretations. As Ms. Holloway says in her letter, "this is the first opportunity for the Board to interpret its rule, it is prudent course for staff to more strictly apply the definition and allow the Executive Director and Board to provide its input should you choose to appeal." A strict application of a rule is one thing, but not when the interpretation is based on language not contained anywhere in the text. That is not a strict interpretation but instead is a misinterpretation, albeit innocently made.

Another reason I take issue with staff's interpretation is that Supportive Housing projects without hard debt financing almost always includes a sponsor loan made up of charitable contributions, other fundraising opportunities and various forms of governmental funding assistance via the sponsor. Numerous Supportive Housing projects funded through both the 9% and 4% program have included an "Operating Subsidy Agreement" in very near the same form as the Operating Subsidy Agreement submitted with the Projects. In the instances before us, it seems illogical and contrary to common sense that because TDHCA now permits Supportive Housing projects to have hard debt that a sponsor can no longer provide funds to satisfy the "operating subsidy" requirement. Why would there be a distinction? In past Supportive Housing projects, nonprofit Sponsors, similar to Caritas, arranged and funded the capital, along with the sale of the tax credits, to finance the development, construction and operations of those projects. Again, why a distinction? And how were the Applicants or their consultant to know that staff would deem such Operating Subsidy Agreement unacceptable when the very definition of Supportive Housing incorporates a Nonprofit Sponsor that is "on the hook" for not only the capital funding gap, but more significantly the operations and supportive services critical to the success of these types of projects.

One other reason why it is my opinion that staff has misinterpreted the Regulation is because the Regulation states that it is only if the hard debt is either "not sourced by federal funds or is not provided by an Affiliate and originally sourced from charitable contributions or pass-through local government non-federal funds," that the applicant must then satisfy that the project will be supported either by "project-based rental or operating subsidies for 25% of the Units." The Regulation clearly permits the hard debt funds to come from an Affiliate if those funds were originally "sourced from charitable contributions or pass-through local government non-federal funds." It does not make sense for Regulations to require an "external authority" to provide the "operating subsidy" and not an Affiliate when the Affiliate is permitted to make a hard debt loan to the applicant directly. I do not understand why there is a distinction being made by staff between

an Affiliate making a hard debt loan directly but it not being permitted to provide an “operating subsidy” for 25% of the Units.

There has been great time and care put into the crafting of the Supportive Housing definition in the QAP in order to preserve the set-aside for mission-driven projects led by strong non-profit sponsors that will truly serve the target population intended. We implore staff to stand-by the strength of that definition and not terminate two applications that literally meet every single clause. In the case of these Applications, the 100% member and manager of each of the respective General Partners is Caritas – a long-standing and respected nonprofit supportive housing provider in the City of Austin. This structure does not deviate from the structure of past funded Supportive Housing developments without hard debt financing who have been approved to commit to fund their projects’ operations through similar operating subsidy agreements.

At the November 7, 2019 meeting of the Board, staff presented their Reasoned Response to the 2020 Draft QAP including comments specifically made on the new hard debt provision added to the Supportive Housing definition. I want to bring attention to two important features of that response which the Applicants and I fully agree with – 1) Rental vouchers and operating subsidies are feasibility considerations – they are not threshold considerations. These two high-scoring projects in great locations with full local support are being terminated for a feasibility conclusion before they even had the chance to be reviewed by Underwriting staff. This contradicts the way all other affordable housing (including Supportive Housing) projects have been handled in past cycles. 2) The point made by staff that Supportive Housing projects do not have just a singular source of operating subsidy, but in fact a variety is the very nature as to why an Operating Subsidy Agreement was utilized for the projects. The Operating Subsidy Agreement was a way to project-base all of those varied subsidies to the specific project as required by the definition. Staff appeared to understand that process in the Reasoned Response, but this thought pattern was not recognized in the deficiency issued for the Project. The Reasoned Response language is as follows:

“In response to Commenters’ (17) and (32) objection to all Units needing to be supported by project-based rental or operating subsidies if the Supportive Housing Development is to carry permanent debt, staff believes that that assurance of this continued support is important to a feasibility conclusion. Proposed Supportive Housing Developments are not limited to a single source of rental subsidy or operating support; in fact, it is common that a Development access a number of different sources throughout its operations. Staff believes that the definition is sufficiently flexible to allow for more than one form of operating assistance.”

As far as these Projects being financially sound, it is important to make you aware of the partners unequivocally dedicated to these Projects’ success: Caritas – 100% member of both of the respective General Partners of the Applicants, co-Developer and Supportive Service Provider – is an established, non-profit supportive housing provider that has been an integral piece of the City of Austin’s social service fabric for 56 years. Their strength is proven not only in the success of their programs but in their fundraising capabilities – averaging \$3,000,000 in private funds annually and \$7,400,000 in governmental grants alone in 2018. Caritas has been strategically planning for the development of these Projects by launching a capital campaign – Vision 2025 – to intentionally expand their housing footprint. Caritas is devoted to one mission: ending

homelessness. In order to achieve that mission, a community must have deep-impact, high-quality affordable housing with wrap-around supportive services. In order to increase local capacity and begin to build out a pipeline of this focused housing, Caritas partnered with The Vecino Group. The Vecino Group is a national developer, owner, and asset manager of Supportive Housing projects across the country. They have developed over a 1,000 units of Supportive Housing – many of those projects structured exactly the same as these Projects – tax credit financed with hard debt and a nonprofit sponsor with an operating subsidy ensuring deep targeting. Please see attached letters as Exhibits A and B, respectively, from Caritas and The Vecino Group with further detail and explanation.

It should also be noted that these Projects are two of the highest scoring projects in this year's tax credit program. Espero Austin at W. 24th is the highest scoring application and Espero Austin at Rutland is tied for the third highest (removing the 5 points for Readiness to Proceed that is based on location). Out of 138 applications, a #1 and #3 ranked application will be terminated based on an "interpretation." Both of the Projects would be funded in the Region 7 Urban allocation if allowed to move forward.

Aside from the arguments made above, there are policy reasons for why these Applications should not be terminated. As you are well aware, the homeless population in the City of Austin is at a critical and historical level. These projects would provide 222 units of high-quality, supportive housing for homeless persons that otherwise will not exist. It is exactly public-private partnerships like the one proposed between Caritas, The Vecino Group, the City of Austin and TDHCA that can make truly transformational projects such as these a desperately-needed reality. It is unquestionable that the City of Austin has an acute need for additional Supportive Housing. These two Projects, would not only provide relief to this issue, but would establish a pipeline and evidence-based best practice to begin moving the needle in addressing homelessness in the City of Austin.

There is broad support for these Projects with letters from the following individuals sharing important supplemental details as to the strength and success of Caritas, the need for more Supportive Housing and the detriment of the termination:

State Senator Kirk Watson - Exhibit C
State Representative Gina Hinojosa – Exhibit D
Rosie Truelove, Director of City of Austin Neighborhood Housing and Community Development Department – Exhibit E
Stephanie Hayden, Director of Austin Public Health – Exhibit F
Matthew Mollica, Executive Director of ECHO – Exhibit G
Eric Samuels, President and CEO of Texas Homeless Network – Exhibit H
Debbie Thiele, Managing Director of Corporation for Supportive Housing – Exhibit I

To summarize, it is the position of Applicants that staff has misinterpreted the Regulation primarily on the basis that the Regulation nowhere states that it requires an "external authority" to fund an "operating subsidy"; there is precedence for mission-based Supportive Housing funded by TDHCA to have sponsors commit to funding both capital AND operations; an operating subsidy

Bobby Wilkinson
April 13, 2020
Page 5

is inherently a feasibility issue and not a threshold issue; these are two of the highest scoring applications in Texas that are being terminated before their merit can be realized; there are public policy reasons underlying the support for these Projects; and these Projects are strongly supported by Senator Watson, State Representative Hinojosa and key leaders in the City of Austin's anchor affordable housing and supportive service agencies.

For the above reasons, I respectfully request your reinstatement of the Applications. If you determine the Applications should remain terminated, then please place this item on the next available Board's agenda.

Very truly yours,



John C. Shackelford

JCS/klm

cc: Marni Holloway, Director of Multifamily Finance (via email)
Sharon Gamble, Administrator, 9% Competitive Housing Tax Credit Program (via email)
Beau Eccles, Esq. (via email)
Jo Kathryn Quinn (via email)
Richard Manzardo (via email)
Jennifer Hicks (via email)
Michelle Snedden (of the Firm)
Kara Hargrove (of the Firm)

EXHIBIT A



611 Neches Street
PO Box 1947
Austin, TX 78767

Main: 512.479.4610
Fax: 512.472.4164

Board of Directors

Troy West
Board Chair

Melissa Ayala

Emily Blair

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Monica Guzmán

John Lavorato

Felicia Mason-Edwards

Tracy Snodgrass

Ramesh Swaminathan

John Trube

Anselmo Unite

Raquel Valdez Sanchez

Mike Haggerty
Emeritus

April 9, 2020

Mr. Bobby Wilkinson
Executive Director
Texas Department of Housing and Community Affairs

221 East 11th Street
Austin, Texas 78701

RE: Espero Austin at Rutland
1934 Rutland Drive, Austin, TX 78758
TDHCA #20040

Espero Austin at W. 24th
911-915 W. 24th Street, Austin, TX 78705
TDHCA #20041

Dear Mr. Wilkinson,

I respectfully implore you seriously consider granting our appeal filed for Espero Austin at Rutland and Espero Austin at W. 24th with regard to the 2020 9% Housing Tax Credit applications #20040 and #20041. The developments outlined in our applications will provide an unprecedented model of Supportive Housing in our region. Until now, our region has not performed well to make deeply affordable housing accessible to people experiencing homelessness. These developments change that. Caritas of Austin (Caritas) has been operating Supportive Housing for 14 years and has developed our expertise which permanently ends homelessness for people who have spent years on the streets of our city. Granting our appeal will allow Caritas of Austin to permanently end homelessness for a combined 222 individuals in Austin while increasing our City's capacity for employing evidence-based practices to effectively end homelessness in the aggregate by adding Caritas of Austin, a capable and strong non-profit housing partner, to the solution.

Our applications have been terminated due to an interpretation of newly added language to the 2020 Qualified Allocation Plan that is focused on the requirement of a Supportive Housing project to have either project-based vouchers or an operational subsidy on 25% of the units if it is to carry hard debt. Caritas of Austin met the intended simplicity of the newly added language by submitting an Operating Subsidy Agreement, committing ourselves to ensuring the subsidy through private fundraising if other local, state or federally sourced subsidies are not forthcoming. Furthermore, in our response to the deficiency, we provided substantial documentation of available sources of operational subsidy that will be tapped to not only subsidize 25% of the units, but a more aggressive goal of 100% being covered by some form of operational subsidy. Caritas of Austin has strong relationships with, and is a

long-time contractor with federal and city entities for operational subsidies for the homeless population.

I deeply appreciate TDHCA's Supportive Housing definition which ensures only mission-driven projects, with a history of Supportive Housing provision and experience with the target population, are prioritized to receive funding under this set-aside. However, the QAP does not provide any further clarification or definition as to what is expected of an "operational subsidy." For this subsidy to be sourced from a third party such as local, state or federal government entities, is not stated in the 2020 rules. This lack of clarity in the rules now threatens two of the highest scoring projects in the State and two projects in line to receive funding in Urban Region 7 (ranked #1 and #3). Additionally, I take exception to the staff's implication in this decision that third-party funding/vouchers is more predictable or stable than funding from the private sector. Caritas of Austin self-funding the operational subsidy is significantly more stable and predictable than an outside source over which we have no control. As well, there are many philanthropists and charitable corporate partners who prioritize just these kinds of tangible projects which have clear concise outcomes. I have complete confidence in Caritas' ability to raise these funds year over year.

Caritas of Austin builds wellbeing for people experiencing homelessness so they can reach their full potential. Caritas has been serving people experiencing poverty and homelessness in Austin since 1964. We have a stellar record of evolution with the needs of our community while remaining stubbornly focused on our mission. Through the years our organization has developed longstanding relationships with formidable philanthropists across the region and state. While, as stated above, we are grateful for our strong relationships with government entities; governmental levels of funding are never enough to meet the needs of our clients; and we must have the support of the private sector to maintain high-quality effective service and operations. Caritas is a local nonprofit with years of experience and success permanently ending homelessness for hundreds every year through Supportive Housing. We have a 98% success rate with people who have had extensive homeless experiences (chronic homeless) because our strategies are data-driven and our approach is comprehensive. Keeping people housed requires layers of support to build wellbeing; and Caritas has in-house programming for social supports, mental health, food access, education, job training, job placement and career development. These layers of support are anchored by the client and case manager partnership which is of utmost criticality; resulting in deep understanding and respect. Our high-quality reputation has resulted in the trust and investment of the philanthropic community in Austin and Central Texas.

I have been passionate about ending homelessness since 1979 when, as a young adult, I saw for the first time someone sleeping on the streets of New York. Now people are sleeping on the streets of every major and mid-sized city in Texas. A shared priority of the State of Texas and every major Texas City is to address homelessness. Caritas of Austin's work is transformational and ends homelessness. I hope that we can leverage the valuable resource of housing tax credits and partner with the State of Texas on an indisputable solution – high-quality affordable housing that builds wellbeing so people can reach their full potential--projects like Espero Austin at W. 24th and Espero Austin at Rutland.

I look forward to your favorable determination to our appeal. If you have any questions, please do not hesitate to contact me at jkquinn@caritasofaustin.org or 512-466-7080.

Respectfully,



Jo Kathryn Quinn, President/CEO
Caritas of Austin



EXHIBIT B



THE VECINO GROUP
Housing for the greater good.

April 10, 2020

Texas Department of Housing and Community Affairs
221 East 11th Street
Austin, Texas 78701

**RE: 9% HTC Application Deficiency Notice TDHCA
#20040-Espero Austin at Rutland
#20041-Espero Austin at W. 24th**

Dear Executive Director Wilkinson,

This letter is a response to the staff decision to terminate the Espero Austin at Rutland (#20040) application and the Espero Austin at W. 24th (#20041) application. It is our strong belief that the applications meet the definition of Supportive Housing as outlined in the QAP, as well as satisfy the definition of Operating Subsidy located within the QAP. Respectfully, we ask that you consider the following evidence.

- In the termination letter, staff references the definition of Supportive Housing and sites the fact that developments must be supported by project-based rental or operating subsidies for a minimum of 25% of all units. The Espero applications have an operating subsidy agreement that meets this requirement. In terminating the application, staff overlooked the QAP provision that allows for an agreement securing the funds. This provision states “Such documentation shall, at a minimum, identify source and annual amount of the funds, the number of units receiving the funds, and the term and expiration date of the contract or other agreement.” The operating subsidy agreement provided in the Espero applications meets the requirement as outlined in the QAP. In the letter, staff references a portion of our response that is not germane to our attempt to satisfy this provision. The paragraph they quote is merely background information on why vouchers were not available and therefore not relevant to our adherence to the QAP.
- In addition, Staff, diverting completely from the QAP, made the determination that such operating subsidy must now be external and cannot come from Caritas. This seems especially arbitrary when you consider that capital funding commitments for the application do not need to be external. If this had been in the rules, we would have sought an exterior funding backstop. If the rules are changing post application deadline, shouldn't we have an opportunity to change to an exterior subsidy? As you can see with our attachment, there are numerous ways we can achieve financial security.
- Vecino Group and Caritas chose to work with Jennifer Hicks in large part due to her 20 years experience developing Supportive Housing under the Texas QAP. Over those 20 years, Jennifer

305 W. Commercial St. Springfield MO 65803

417-720-1577 | www.vecinogroup.com



THE VECINO GROUP
Housing for the greater good.

has followed, and nearly memorized the QAP, and never had a terminated application. We believe, with her guidance, we clearly followed the QAP in this instance as well. She did a tremendous job helping put the pieces of this development together and the adherence to the QAP should be honored by TDHCA.

- The absence of project-based vouchers in the City of Austin is not a reason to terminate the application. Instead, it is a compelling reason to fund the Espero Austin projects into existence. A Supportive Housing development that creates a sustainable source of rental assistance and supportive service funding, despite a lack of currently available resources, is a best practice model of creating Supportive Housing in the face of limitations. The takeaway is that the Espero Austin projects will leverage new resources.
- Since 2011, the Vecino Group has developed 18 Supportive Housing communities in 7 states. Under the Supportive Housing portfolio at Vecino Group, 1,196 units have been funded, ending homelessness for 430 households. Of note, 15 of these Supportive Housing developments carry permanent debt containing foreclosure provisions. For examples of successful Vecino Developments that have non-traditional sources of rental assistance, please see the attached document. These developments carry permanent debt, and often also fund services through related entities.
- To deny a project funding because a city does not have available designated funds is to deny housing to the most at-risk populations within said city. The very mission of the Austin and Travis County Housing Agencies depends on finding ways to create Supportive Housing in the absence of available rental assistance. Your QAP outlined a path to doing so. The Vecino Group and Caritas followed those QAP terms verbatim.

Our request is simple. Please do not allow what does not exist (project-based-rental assistance vouchers) to stand in the way of what clearly must exist (Supportive Housing for populations at risk of homelessness). We ask that your decision be guided by both the QAP produced by TDHCA and our shared conviction that all Texas residents deserve quality housing.

Thank you for your consideration.

Sincerely,

Rick Manzardo
The Vecino Group

305 W. Commercial St. Springfield MO 65803

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THE VECINO GROUP
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Supportive Housing must contain several elements to be successful, the most important are a service provider and rental assistance to reach the target population. Each of our communities hosts a strong non-profit partner who provides services, on-site for our Supportive Housing developments. On an annual basis, over \$2.9 million in services is provided at these developments. As stated above, the other important component is rental assistance, as persons that are homeless must have rental assistance, or the housing will not be successful. Rental Assistance is gained in several different ways in Vecino Group communities. Of the 18 communities in our portfolio, 9 communities have a federal and/or state subsidy contract, 8 communities rely on operating/rent subsidy from the non-profit partner or other related entity and of many of the communities work with Bring It Home, Inc. to secure additional funding.

Bring It Home, Inc. is a nationwide non-profit partner. Bring It Home, Inc. raises money to assist Vecino Group communities and helps us secure rental assistance or services funding even after a deal is operational. Over the last year, Bring it Home, Inc. has provided \$207,249 in services funding and rental assistance to assist the overall budgets of our properties

To better understand how Vecino Group completes Supportive Housing communities and continues to operate them, please note the following examples:

Bodhi Salt Lake City is an 80-unit community. Out of the 80 units, 23 units are set-aside for persons that are chronically homeless and have a severe and persistent mental illness. The 51% general partner is a non-profit developer, Housing Connect. The community was funded through federal and state tax credits. In addition to Housing Connect, Utah Community Action is the on-site, full-time service provider. The services for Bodhi are paid through operating subsidy. When Bodhi was funded, vouchers were not available through the housing authority, to date the 23 units have received housing choice vouchers through the County Housing Authority. Bodhi has been in operation for over two years, with a 96% occupancy rate.

Freedom Place St. Louis is a 68-unit community dedicated to Veterans who are homeless. This community was funded through historic, state and federal tax credits. The services budget at Freedom Place is \$577,098 annually. The services budget is paid for through outside fundraising. In addition, the 68-unit community, when originally funded, did not have vouchers connected to the units. Our non-profit partner dedicated their vouchers through Missouri Department of Mental Health to the community. Freedom Place has been in operation since October of 2014, with no evictions, keeping Veterans permanently housed for over 6 years.

Talia Springfield is a 46-unit community, with 23 units set-aside for survivors of domestic violence. Talia was funded through federal and state tax credits. Talia hosts a 51% general partner, Harmony House, who is also the service provider on-site. The services budget for Talia is paid through an operating subsidy. At the time of application, Talia was funded without rental assistance for the 23-units. Since Talia has opened, the rental assistance has been

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funded through Harmony House Continuum of Care funds. Talia has been in operation since September of 2017, to date, there have not been any evictions from the set-aside units.

Operating subsidy and outside fundraising are what has made each of our communities successful, to deny a project funding based on the notion that it cannot be done, is denying Supportive Housing to households in Austin and halting any progress made in ending homelessness. These developments will decrease homelessness in Austin by a combined 222 lives uplifted. Vecino Group works to end homelessness nationally and looks forward to partnering with Caritas of Austin, TDHCA, and the City of Austin to continue our company's mission.

305 W. Commercial St. Springfield MO 65803

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EXHIBIT C



KIRK WATSON
STATE SENATOR • DISTRICT 14

NOMINATIONS - VICE CHAIR
EDUCATION
FINANCE
HIGHER EDUCATION

April 7, 2020

Bobby Wilkinson
Executive Director
Texas Department of Housing and Community Affairs
221 East 11th Street
Austin, Texas 78701

RE: Espero Austin at Rutland
1934 Rutland Drive, Austin, TX 78758
TDHCA #20040

Espero Austin at W. 24th
911-915 W. 24th Street, Austin, TX 78705
TDHCA #20041

Dear Mr. Wilkinson:

I am writing this letter to respectively urge you to grant the appeal filed for Espero Austin at Rutland and Espero Austin at W. 24th with regard to the 2020 9% Housing Tax Credit applications #20040 and #20041. These two applications will deliver desperately-needed Supportive Housing that will immediately end homelessness for a combined 222 individuals in Austin, while also increasing the capacity to further alleviate homelessness by adding another strong non-profit housing partner to the solution.

I understand that both of these Applications have been terminated due to an interpretation of newly added language to the 2020 Qualified Allocation Plan that requires a Supportive Housing project that is carrying hard debt to have at least 25% of the units "be supported by project-based rental or operating subsidies." Given the lack of any guidance on this new language, I feel that Caritas of Austin met the intended simplicity of this requirement through their Operating Subsidy Agreement, which commits Caritas of Austin to financially supporting 25% of the units.

Further, it is my understanding from the termination letter sent by the Agency on April 6, 2020 that there might be some concern that the funds are not being committed from an "external entity." I have two issues with this interpretation. First, Caritas is separate and apart from the development. While Caritas is a partner of each Applicant partnership, it is a separate legal entity. Secondly, there is no stated requirement in the rules that the funding be committed from an "external entity." Even if the Agency does not believe Caritas to be legally distinct from the Applicants, such a distinction for purposes of providing the support for 25% of the units was not set forth as a requirement of the rule and therefore is an inappropriate standard to apply to the Applicants here.

TDHCA staff has crafted a Supportive Housing definition with several checks and balances that ensures that only mission-driven projects with a history of Supportive Housing provision and experience with the target population are able to receive funding under this set-aside. The QAP does not provide any further clarification or definition as to what is expected of an "operational subsidy." If the intent was for this subsidy to be local, State or Federally-sourced, then I encourage us to explore that change in next year's QAP without terminating two of the highest scoring projects in the State and two projects in line to receive funding in Urban Region 7 (ranked #1 and #3).

Caritas of Austin – as a local nonprofit with a track record of success and years of experience in addressing housing instability through supportive housing – is a supremely qualified nonprofit to deliver additional high-quality, deep-impact, intensely-supportive housing to our neighbors who need it most. Their success in keeping people housed is due to the wrap-around supports that stabilize lives. The food program ensures people have healthy food as they rebuild their lives. Education classes teach life skills so people can reach their full potential. Job placement and career development build strong futures for families. Most important is the core relationship between Caritas of Austin staff and the people they serve – a deep understanding and respect.

Caritas of Austin's work is transformational and ends homelessness. A shared priority of the State of Texas and every major Texas City is to address homelessness. I hope that we can leverage the valuable resource of housing tax credits in order for the State of Texas to partner on an indisputable solution – high-quality affordable housing with wrap-around supportive services as defined by projects like Espero Austin at W. 24th and Espero Austin at Rutland.

I look forward to your favorable determination to grant the applicant's appeal. If you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Kirk Watson". The signature is fluid and cursive, written in a professional style.

Senator Kirk Watson

EXHIBIT D



GINA HINOJOSA



STATE REPRESENTATIVE • DISTRICT 49

April 13, 2020

Bobby Wilkinson
Executive Director
Texas Department of Housing and Community Affairs
221 East 11th Street
Austin, Texas 78701

RE: Espero Austin at Rutland
 1934 Rutland Drive, Austin, TX 78758
 TDHCA #20040

Espero Austin at W. 24th
911-915 W. 24th Street, Austin, TX 78705
TDHCA #20041

Dear Mr. Wilkinson:

I have recently learned that Espero Austin at Rutland and Espero Austin at W. 24th - two projects that will deliver desperately-needed Supportive Housing to the City of Austin – have been terminated due to an interpretation of newly added language to the 2020 Qualified Allocation Plan that is focused on the requirement of a Supportive Housing project to have either project-based vouchers or an operational subsidy on 25% of the units if it is to carry hard debt. *I write today to express both my belief in the important work that Caritas of Austin is doing every day to end homelessness and to the need for affordable housing options, including and especially, permanent supportive housing in the district that I represent.*

Caritas of Austin is a local nonprofit with much community support that has a track record of success and years of experience in addressing housing instability through supportive housing. Caritas of Austin touts an outstanding 98% success rate in housing persons who have experienced long-term homelessness.

The need for these services is large and growing according to the most recent “Point in Time” count which demonstrated a 5% increase. Many of those living in a state of homelessness are within the district that I represent which has the largest counted population of people experiencing homelessness in Austin. Both Espero projects are within the district that I represent.

While I understand there are other worthy proposals for Austin for you to consider and your determination must take into account various factors, to the extent that the experience of the applicant and the extreme need for the services are relevant considerations, I submit this letter.

Thank you for your consideration,

A handwritten signature in black ink, appearing to read "Gina Hinojosa".

Gina Hinojosa
State Representative, District 49



STATE REPRESENTATIVE
JOHN P. CYRIER

DISTRICT 17

April 17, 2020

Bobby Wilkinson
Executive Director
Texas Department of Housing and Community Affairs
221 East 11th Street
Austin, Texas 78701

RE: Espero Austin at Rutland
 1934 Rutland Drive, Austin, TX 78758
 TDHCA #20040

 Espero Austin at W. 24th
 911-915 W. 24th Street, Austin, TX 78705
 TDHCA #20041

Dear Mr. Wilkinson:

I am writing to advocate for and respectfully ask you to grant the appeal filed for Espero Austin (Application #20040) at Rutland and Espero Austin at W. 24th (Application #20041) for the 2020 9% Housing Tax Credit Program. These developments would provide critical Supportive Housing in the city of Austin, bringing housing to up to 222 individuals in the homeless community. These applications fulfill a much needed void in the region and are well within the new guidelines adopted by Texas Department of Housing and Community Affairs for Supportive Housing.

Espero at Rutland, LP and Espero at W. 24th, LP have filed for appeals for their respective applications. Each application fulfills the 25% threshold to "be supported by project-based rental or operating subsidies" through a private solution using Caritas of Austin to financially support 25% of the units. I believe both partnerships have met the requirements set forth by TDHCA, as these Limited Partnerships are separate legal entities from Caritas of Austin. No distinction was made in the newly adopted rules to prevent this solution from fulfilling the Supportive Housing requirement.

As a former Chairman of Caritas of Austin, I believe strongly in their mission as a non-profit organization. I am proud of the work they are doing with these developments and their mission to prevent and end homelessness in Central Texas. Even when I was chairman, we discussed the possibility of developments just like the two applications under appeal before you. Their reputation is among the

COMMITTEES: CHAIR - CULTURE, RECREATION AND TOURISM • JUVENILE JUSTICE AND FAMILY ISSUES

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STATE REPRESENTATIVE
JOHN P. CYRIER

DISTRICT 17

best in the state, and over the years, they have developed strong community partnerships that have set them up for success time and time again.

Again, I respectfully request you grant the appeals for both applications before you. These developments are important to the community and have followed the necessary requirements. Thank you for your consideration, and please let me know if you have any questions.

Respectfully,

A handwritten signature in black ink, reading "J.P. Cyrier".

John Cyrier
State Representative, District 17



COMMITTEES: CHAIR - CULTURE, RECREATION AND TOURISM • JUVENILE JUSTICE AND FAMILY ISSUES

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EXHIBIT E



City of Austin

Neighborhood Housing and Community Development

P.O. Box 1088, Austin, TX 78767 -1088

(512) 974-3100 ♦ Fax (512) 974-3112 ♦ www.cityofaustin.org/housing

April 9, 2020

Bobby Wilkinson
Executive Director
Texas Department of Housing and Community Affairs
221 East 11th Street
Austin, Texas 78701

RE: Espero Austin at Rutland
1934 Rutland Drive, Austin, TX 78758
TDHCA #20040

Espero Austin at W. 24th
911-915 W. 24th Street, Austin, TX 78705
TDHCA #20041

Dear Mr. Wilkinson:

I am writing this letter to supplement the previous letter I submitted with the Deficiency Response for Caritas of Austin's two proposed 2020 Housing Tax Credit affordable housing developments – Espero Austin at Rutland and Espero Austin at W. 24th. I recently learned that the Deficiency Response was not accepted and both applications have been terminated. Termination of these two projects will be a detrimental blow to the City of Austin's progress in building a pipeline of high-quality, supportive housing that will serve exclusively persons previously experiencing homelessness.

I want to stress the importance of these two projects in the City of Austin's collective response to ending homelessness. They will not only provide housing stability for persons with extremely low incomes, but will dig deeper. These two projects will serve persons coming directly off the Coordinated Entry system – a nationally-recognized community prioritization tool that distinguishes the most vulnerable of our City's homeless. While we have many high-quality affordable housing communities in the City of Austin, not enough units have been dedicated exclusively to this population. As a housing provider that is intimately familiar and unilaterally dedicated to ending homelessness, Caritas of Austin is uniquely positioned to serve highly vulnerable people experiencing homelessness who have multiple barriers to stable housing. Likewise the City of Austin is uniquely positioned with multiple funding sources to include local and federal to infuse crucial gap financing, with a scoring mechanism that prioritizes these units for funding.

I would also like to emphasize the strength of Caritas of Austin. The agency is a leading nonprofit homeless housing and service provider who have a singular goal – ending homelessness. They have been a trusted provider of supportive housing in Austin for more than

The City of Austin is committed to compliance with the Americans with Disabilities Act and will provide reasonable modifications and equal access to communications upon request.

13 years and have had unparalleled success in keeping Austin's hardest to serve with roofs over their head. Espero Austin at Rutland and Espero Austin at W. 24th are not just supportive housing units we hope to have - they are mission critical and fundamental in moving the needle on alleviating homelessness.

In my previous letter, I provided information on all the subsidy resources that Caritas of Austin already taps and that will be available to persons living in these two communities. I explained that these resources are tenant-based by nature. Caritas of Austin is intimately familiar with the way subsidy funding in Austin flows and that is why they submitted an Operating Subsidy Agreement to "project-base" the ample funding that will flow to them in the form of operating subsidies from local and federal-pass through dollars. To require a project-based subsidy from an external source at the time of application for tax credits (approximately two years before a project is actually placed in service) is not in alignment with the way local housing subsidies are administered. However, I will stress that the City of Austin has an infused capital program with \$250 million Affordable Housing General Obligation Bond Program approved in 2018. These local resources are aimed directly at funding affordable housing developments that serve Austin's low-income communities. This is in addition to its Housing Trust Fund and federal dollars that directly support affordable housing developments applying for local gap financing.

As an additional testament to the strength, value and success of Caritas of Austin in our community, please know that the City of Austin just awarded the first contract providing emergency rent relief to address the economic impacts of COVID-19 in our community. Caritas of Austin was selected to administer this program. In this time of crisis, we are looking to Caritas of Austin. We hope that TDHCA will make this same choice when considering this appeal.

Caritas of Austin's two proposed housing developments provide an ideal opportunity for the City of Austin to partner with the State of Texas to address chronic homelessness in a comprehensive and thoughtful manner. We look forward to the opportunity to leverage our existing capital resources and future operational subsidies to ensure these developments are successful.

If you have any questions, please do not hesitate to contact me.

Sincerely,



Rosie Truelove
Director

EXHIBIT F



OFFICE OF THE DIRECTOR

P.O. Box 1088

Austin, Texas 78767

Phone (512) 972-5010

Fax (512) 972-5016

April 10, 2020

Bobby Wilkinson
Executive Director
Texas Department of Housing and Community Affairs
221 East 11th Street
Austin, Texas 78701

RE: Espero Austin at Rutland
1934 Rutland Drive, Austin, TX 78758
TDHCA #20040

Espero Austin at W. 24th
911-915 W. 24th Street, Austin, TX 78705
TDHCA #20041

Dear Mr. Wilkinson:

I am delighted to write this letter to support Caritas of Austin and the two proposed 2020 Housing Tax Credit affordable housing development projects; 1) Espero Austin at Rutland and 2) Espero Austin at W. 24th.

Austin Public Health has a long-standing relationship with Caritas of Austin. Caritas of Austin is a key agency in the City of Austin's team of nonprofits. This agency is working tirelessly to end homelessness in our community. Their outstanding achievements include the following:

- Maintaining a professional relationship with the City of Austin for over 20 years.
- They are the recipients of over \$3.9 in annual contracts with Austin Public Health. These contracts provide rental subsidies and supportive service funding for Caritas of Austin's various strategies for providing supportive housing.
- Caritas of Austin is the lead and fiscal agent for Austin Public Health's largest supportive housing program; Best Single Source Plus. A collaborative preventing and ending homelessness in Austin and Travis County since 2005.

The City of Austin is in dire need of high-quality, affordable housing with wrap-around supportive services that will serve persons experiencing homelessness. These projects will not only meet this goal but will also add much-needed capacity to Austin's mission-based affordable housing developers.





While others may be uncertain of Caritas of Austin's ability to attract operating and rental subsidies for their new projects, we feel very confident in their abilities.

Caritas has decades long tradition of providing support to those in need in our community. The strength, success and dedication of Caritas of Austin is unparalleled in their work to ending homelessness in Austin. They are beyond qualified to take the next step into owning their own supportive housing communities. Their long history of contracts with Austin Public Health provides testament to the operating and supportive service fundraising ability that will benefit the proposed projects.

Austin Public Health fully supports Caritas of Austin in their endeavor to develop and own new supportive housing in our community. Caritas of Austin has demonstrated strength in our community, a successful track record and their commitment to ending homelessness. Your consideration of this proposal is greatly appreciated.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Stephanie Y. Hayden', is written over a horizontal line. The signature is fluid and cursive.

Stephanie Y. Hayden, LMSW
Director - Austin Public Health



EXHIBIT G



ECHO Board of Directors

April 9, 2020

ALBERTA PHILLIPS, CHAIR
Journalist/Community
Advocate

Bobby Wilkinson
Executive Director
Texas Department of Housing and Community Affairs
221 East 11th Street
Austin, Texas 78701

COSSY HOUGH, LCSW
VICE CHAIR
UT School of Social Work

RE: Espero Austin at Rutland
1934 Rutland Drive, Austin, TX 78758
TDHCA #20040

SHANNON SEDWICK,
SECRETARY
Esther's Follies

Espero Austin at W. 24th
911-915 W. 24th Street, Austin, TX 78705
TDHCA #20041

RYANN RANGEL
Privateer Capital

PEGGY DAVIS BRAUN
PDB Creations. LLC

Dear Mr. Wilkinson:

DANIEL RYNE LUCIO
Google Fiber

I have recently learned the devastating news that Caritas of Austin's two proposed 2020 Housing Tax Credit affordable housing developments – Espero Austin at Rutland and Espero Austin at W. 24th – have been terminated. I represent the Ending Community Homelessness Coalition (ECHO) – the lead agency in Austin in charge of implementing community-wide strategies to end homelessness in Austin and Travis County. Caritas of Austin is a fundamental partner in this work delivering a package of wrap-around services and housing programs that deliver hope and homes to persons experiencing homelessness on a daily basis.

ED MCHORSE
McGinnis Lochridge

I am wholly supportive of the two new Projects and the tremendous impact that they will have on the way the City of Austin addresses homelessness. In my daily struggle to realize solutions to ending homelessness, I know that Supportive Housing is an incomparable evidence-based strategy that keeps persons experiencing homelessness compassionately housed and off streets and out of shelters. In the City of Austin, as in most Cities across Texas, the major hurdles to creating more Supportive Housing units to end homelessness are three-fold:

GREG HARTMAN
Vice Chancellor for Strategic
Initiatives, TX A&M System

- 1) **CAPACITY:** There are not enough mission-based nonprofits doing this work. Supportive Housing development, ownership and management is unique. It is paramount that the provider intimately understands the population and has a success-based strategy for serving this population. Caritas of Austin is a leader in their work and supremely qualified. We cannot keep relying on the same providers to deliver units, we will never scale up and we will never make a dent. The two projects by Caritas of Austin is an intentional measure to respond to our affordable housing crisis and begin delivering units on a larger scale by a qualified provider.
- 2) **FUNDING:** In order to move the needle on addressing homelessness, we need to change the way we develop projects. By allowing Supportive Housing projects to carry a sliver of hard debt, you are freeing up valuable contributions in our community to funnel toward the life-giving operational subsidies and supportive services crucial to this housing. Caritas of Austin is a powerful fundraiser due to the success and impact of their work. We must accept other ways of capitalizing and funding Supportive Housing to break through this hurdle. The new language in the QAP that allows hard debt for Supportive Housing does just this. I kindly ask the TDHCA ED and Board to stand by their just decision to add this clause to the QAP, and allow these two very worthy projects to proceed.
- 3) **TARGET POPULATION:** ECHO's work is focused on systems that address homelessness. One of our primary tools in that system is our Coordinated Entry and Assessment – a prioritization tool that measures a homeless person's vulnerability. This system allows resources to be pooled for persons who need it the most. Caritas is unwavering in their participation and dedication to this prioritization tool. There is a dire need for Supportive Housing units that are dedicated to this system. Every person that comes off this list and into housing is a life saved and one-by-one our homeless count is reduced. Only with projects like Espero Austin dedicated to this community-based system, will we make progress.

LYNN MEREDITH
Community Advocate

C. LANE PRICKETT
Attorney

JOY RUCKER
Texas Harm Reduction
Alliance

MARK LITTLEFIELD
Littlefield Consulting

BETTY STAEHR
Community Advocate

EX-OFFICIO MEMBERS

A.J. JOHNSON
TIM LEAGUE
PERRY LORENZ

EXECUTIVE DIRECTOR

Matthew Mollica
860-287-2587
matthewmollica@austinecho.org



ECHO Board of Directors

ALBERTA PHILLIPS, CHAIR
Journalist/Community
Advocate

COSSY HOUGH, LCSW
VICE CHAIR
UT School of Social Work

SHANNON SEDWICK,
SECRETARY
Esther's Follies

RYANN RANGEL
Privateer Capital

PEGGY DAVIS BRAUN
PDB Creations. LLC

DANIEL RYNE LUCIO
Google Fiber

BOBBY DILLARD
Cielo Properties

ED MCHORSE
McGinnis Lochridge

GREG HARTMAN
Vice Chancellor for Strategic
Initiatives, TX A&M System

LYNN MEREDITH
Community Advocate

C. LANE PRICKETT
Attorney

JOY RUCKER
Texas Harm Reduction
Alliance

MARK LITTLEFIELD
Littlefield Consulting

BETTY STAEHR
Community Advocate

EX-OFFICIO MEMBERS

A.J. JOHNSON
TIM LEAGUE
PERRY LORENZ

EXECUTIVE DIRECTOR

Matthew Mollica
860-287-2587
matthewmollica@austinecho.org

I am appreciative of your time and hope that the State of Texas will partner with the excellent tools and resources in place in Austin to deliver these two significantly impactful projects to our City.

If you have any questions, please do not hesitate to contact me.

Most Sincerely,

Matthew Mollica
Executive Director

EXHIBIT H



Board of Directors

April 10, 2020

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Todd Shell
Houston

Bobby Wilkinson
Executive Director
Texas Department of Housing and Community Affairs
221 East 11th Street
Austin, Texas 78701

Vice Chair

Ben King
Houston

RE: Espero Austin at Rutland
1934 Rutland Drive, Austin, TX 78758
TDHCA #20040

Secretary

Taylor Cook
Austin

Espero Austin at W. 24th
911-915 W. 24th Street, Austin, TX 78705
TDHCA #20041

Treasurer

Bill Hubbard
San Marcos

Dear Mr. Wilkinson:

Members

Stephanie Day
Houston

I am writing this letter in support of Caritas of Austin's two proposed 2020 Housing Tax Credit affordable housing developments – Espero Austin at Rutland and Espero Austin at W. 24th. Texas Homeless Network (THN) is a statewide non-profit helping communities strategically plan to prevent and end homelessness. We believe these two projects represent a path forward to alleviating homelessness in Austin by leveraging local homeless response systems' planning and resources with State of Texas housing tax credit dollars. The Espero Austin projects provide an important opportunity for the State of Texas to become a champion and best practice model of addressing homelessness across the state.

Tamara Foster
Houston

Daniel Kuehn
Austin

Nathan Pisk
Austin

I have learned that both of these crucial projects have been terminated due to an interpretation of the newly added language in the definition of Supportive Housing related to an operating subsidy requirement for Supportive Housing projects to have hard debt. I want to make two important points related to this new language and these two specific projects:

Heather Slay
Houston

Greg Thoennes
Austin

1) As a State, we need to begin looking at new opportunities to scale up our production of deeply affordable rental housing with wrap-around Supportive Services that dig deep to explicitly target persons experiencing homelessness. By allowing mission-based Supportive Housing with strong nonprofit partners to carry hard debt, you are freeing up those organizations to instead fundraise for the operating subsidies and supportive service dollars that are paramount to success. We need more units. We need to build out more capacity in our Texas Cities. We need to leverage new dollars.

President & CEO

Eric Samuels

2) Caritas of Austin is an anchor homeless service and supportive housing provider with merit and recognition across the state for the work they do every single day in Austin to end homelessness. I consider their housing programs a best practice example of an intentional and evidence-based tool to increasing housing

stability and alleviating homelessness. Caritas has been a partner of THN for decades and I consider them one of the strongest nonprofits in the State to do this work. To deny Caritas of Austin the opportunity to deliver these two Projects, would be a serious mistake and a grave hindrance to the work to be done to end homelessness across the State.

I am hopeful that you consider my testament of the strength and distinction of Caritas of Austin as an organization uniquely and supremely qualified to develop these Projects and of the importance of the State of Texas to lead the work in addressing homelessness across our great State.

If you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in cursive script, appearing to read "Eric Samuels".

Eric Samuels

EXHIBIT I



April 9, 2020

Bobby Wilkinson, Executive Director
Texas Department of Housing and Community Affairs
221 East 11th Street, Austin, Texas 78701

RE: Caritas of Austin letter of support

Dear Mr. Wilkinson:

I am writing this letter in support of Caritas of Austin and their efforts to bring new supportive housing to the City of Austin and the State of Texas. Corporation for Supportive Housing (CSH) is a national nonprofit dedicated to advancing solutions that use housing as a platform for services to improve the lives of the most vulnerable people, maximize public resources and build healthy communities. Because of our goals we are deeply invested in partners who share our vision to use housing as the proven cost-effective solution to ending homelessness, alleviating poverty and creating healthier communities.

CSH has been a tireless advocate in increasing opportunities for the provision of supportive housing in states and cities across the nation, and we know we can't do it alone. We see the need for local partners with capacity and tenacity to drive the work forward. Caritas has been such a partner. They have a well-established track record as a housing provider with familiarity and experience understanding the needs of vulnerable populations, and a dedication to meeting the needs of those populations by raising funds for crucial subsidies and supportive services.

CSH has had the pleasure of working with Caritas of Austin in the local Pay for Success program – a model for public-private partnership which funds social services dedicated to the highest priority of Austin's chronic homeless population in a performance-based contract. We have seen first-hand the commitment, experience and vitality of this organization in their work to end homelessness.

We believe Caritas of Austin's current plans to create new supportive housing offer a step forward in the State's responses to homelessness and its efforts to address the needs of its most vulnerable residents. We encourage TDHCA to continue to work with Caritas to refine their important plans, if at all possible, and to further these types of important efforts develop quality supportive housing. If you have any questions or would like to discuss this further, please do not hesitate to contact me.

Most Sincerely,

A handwritten signature in black ink that reads "Debbie Thiele".

Debbie Thiele

Managing Director, Western U.S.

206.234.2518, debbie.thiele@csh.org

TDHCA Response



TEXAS DEPARTMENT OF HOUSING AND COMMUNITY AFFAIRS

www.tdhca.state.tx.us

Greg Abbott
GOVERNOR

BOARD MEMBERS
Leslie Bingham, *Vice Chair*
Paul A. Braden, Member
Sharon Thomason, Member
Leo Vasquez, Member

April 27, 2020

Writer's direct dial: (512) 475-3296
Email: bobby.wilkinson@tdhca.state.tx.us

John C. Shackelford
Shackelford, LLP
9201 N. Central Expy., Fourth Floor
Dallas, Texas 75231

RE: APPEAL RESPONSE FOR 20040 ESPERO AUSTIN AT RUTLAND AND 20041 ESPERO AUSTIN AT W. 24TH,
AUSTIN

Dear Mr. Shackelford:

The Texas Department of Housing and Community Affairs received your appeal dated April 13, 2020, regarding the termination of the Applications named above. Staff found that the Applications do not meet the definition of Supportive Housing because the Applicant did not provide sufficient evidence that the Developments will be supported by project-based rental or operating subsidies for 25% of the Units, and the Target Populations must be changed to either Elderly or general. Since the Applications do not meet threshold requirements to be considered Elderly or general, they were terminated, pending the Applicant's right to appeal.

The appeal contends that the agreement submitted with the Application (titled "Espero Austin At W. 24th Operating Subsidy Agreement" – hereinafter "the Agreement")¹ satisfies the below phrase from the definition in 10 TAC §11.1(d)(122)(E)(ii):²

(ii) financed with debt that meets feasibility requirements under Subchapter D of this chapter without exemptions and must also be supported by project-based

¹ The Agreement in Application 20041 is identical except for the title and name of the Partnership, so the analysis that follows is equally applicable.

² This definition is how it was adopted by the Board on November 7, 2019, and then corrected through the waiver process on January 16, 2020, from the version posted to the Texas Register.



rental or operating subsidies for a minimum of 25% of all Units, and meet all of the criteria in subclauses (i) – (VIII) of this clause.³

The phrase “project-based rental or operating subsidies” is the focus of the termination and appeal. I believe staff has reasonably interpreted the phrase to mean “project based rental subsidy or project based operating subsidy.” As you may know, these are both terms of art used in the affordable housing world to generally mean assistance from a third party under a contract with an enforceable promise to pay a monthly or annual fixed amount. Project-based rental assistance is typically provided by HUD or USDA through a contract, and is based on reimbursing the landlord for the difference between a tenant paid rental amount and the amounts of allowable rent for a unit under the applicable project-based program. They are usually multi-year commitments of federal contract rent payments, and may also include comparable state or local government rental assistance programs. See *e.g.* I.R.C. §42(g)(2)(B) exclusions for “gross rent”; definition of Contract Rent in 10 TAC §11.1(d)(28). Project-based rental assistance frequently takes the form of rental “vouchers.”

On the other hand, project-based operating subsidies are typically provided by the public housing side of HUD, or certain USDA programs, and is memorialized as a contract based on the number of low-income units. Project-based operating assistance will have a multiyear contract that describes the monthly or annual payments per unit for the amount of HUD or USDA operating subsidy pledged to the Development. See Tex. Gov’t Code 2306.6705(4) (“an operating subsidy . . . contract or other agreement securing those funds [must contain] identification of: (A) the source and annual amount of the funds; (B) the number of units receiving the funds; and (C) the term and expiration date of the contract . . .”)

As the Applicant interprets the phrase “project-based rental or operating subsidies,” it appears you believe it means “project based rental subsidies or any other form of operating subsidy.” Accordingly, you interpret the phrase to allow an affiliate of the applicant to tender a contract to provide a benefit as later agreed upon, and for no project based rental assistance vouchers to be required.

The relevant portion of the Agreement states:

2.1 Operating Subsidy. The purpose of the subsidy is to provide rental assistance to prospective affordable housing tenants . . . From time to time the Partnership and Caritas will agree upon a base amount of monthly Operations Subsidy necessary for the Subsidy Eligible Units of the Project, as budgeted by the Partnership. . . .

The rationale of requiring non-affiliated parties to provide this type of project-based operating subsidy is clear from the terms of this Agreement: note that the agreement between Caritas and the

³ Indeed, the term “external entity” is not in the rule; however, it is illustrative of the fact that Caritas is not capable of committing project based rental assistance or project based operating subsidies, as the described in this letter.

Partnership does not specify an amount to be paid, but rather they “will agree upon a base amount of monthly Operations Subsidy necessary.” Considering that Caritas is the 100% owner of the Partnership, and that Tex. Gov’t Code §2306.6705(4)(A) requires the identification of the annual amount of funds in the subsidy, it seems unclear whether there actually is a subsidy, as contemplated by statute, in an agreement to agree as between an entity and its wholly-owned partnership.⁴

This point is further demonstrated by section 1.3, which includes in the definition of “Operating Subsidy” any prospective project-based or tenant based vouchers that may be made available to the development or its tenants. Accordingly, as the development or its tenants accrue vouchers, there may come a point where even the annual amount of funds to be agreed upon by Caritas and the Partnership will decrease. This is only to illustrate that this Agreement does not meet the common conception of a project based “operating subsidy.”

The appeal generally questions staff’s interpretation that allows Supportive Housing developments without hard debt financing to include sponsor loans, and include operating subsidy agreements “in very near the same form” as the ones submitted with the Applications at issue. But the definitions of Supportive Housing with and without hard debt are clearly very different in the Rule, and the debate and comment at the November 7, 2019, meeting focused on the difficulty of obtaining the finite resource of vouchers for 100% of the units by the time of application. Relatedly, in response to the initial letter from Staff requesting an explanation as to how the Espero applications met the E(ii) definition, the Applicant responded:

While we would have liked to provide a singular voucher and/or subsidy commitment for each project to meet the 25% requirement, that reality simply does not exist in our community. Our local Housing Authorities do not have an open voucher commitment dedicated to persons experiencing homelessness like other Texas Communities and have many less vouchers in total. Every voucher or operational subsidy available in our community is already being used and it is unrealistic to assume an agency would forward commit existing vouchers or operational subsidies to a project that is at least two years from opening its doors.

Three applications in this round seeking to use the new E(ii) definition of Supportive Housing have been slated for termination and are pending appeal. Beyond the two addressed in this letter is Application #20114: 3300 Caroline Street.⁵ It should be noted that Application #20114 illustrates that there is at least one Texas community that may provide a singular voucher commitment to meet the 25% requirement. According to information submitted with Application #20114, the Houston Housing Authority (HHA) issues Requests for Proposal for project based vouchers that allows HHA to award them prospectively.

⁴ As illustrated by 10 TAC §11.302, the underwriting report relies on information submitted with the Application.

⁵ Application #20114 is on appeal on a separate issue (whether the award of the vouchers must accompany the application or if it can be provided later in the application process or by Commitment).

Numerous letters of support for these applications have been delivered to me from state and local officials. I want to be very clear on this point: TDHCA does not dispute that the City of Austin is in need of more supportive housing. Nor does TDHCA question the noble mission or work of Caritas. My decision to deny this appeal is administrative, and based on what I see as Staff's reasonable interpretation of this new rule, and the need for the Board to ultimately interpret it.

Accordingly, I am denying your appeal on both of these Applications. I fully expect you to file a further appeal with the Board of Directors of the Texas Department of Housing and Community Affairs. Please review 10 TAC §11.902 for the appeal process. If you have any questions or require further information, please contact Marni Holloway, Multifamily Finance Director, at marni.holloway@tdhca.state.tx.us.

Sincerely,

A handwritten signature in black ink, appearing to read "Bobby Wilkinson" with a stylized flourish at the end.

Bobby Wilkinson
Executive Director

Board Appeal Documents

May 8, 2020

(Via Email)

Board of Directors
Texas Department of Housing and Community Affairs
221 E. 11th Street
Austin, TX 78701-2410

RE: Appeal of Termination of Applications;
TDHCA File Nos. 20040 and 20041;
Our File No. 52049.1

Dear Board Members:

This law firm represents Espero Austin at Rutland, LP and Espero Austin at W. 24th, LP (collectively, the “Applicants”), and I have been requested by Jo Kathryn Quinn, President and CEO of Caritas of Austin, Inc. (“Caritas”), to appeal the terminations of the respective Applications filed by Applicants for their projects, Espero Austin at Rutland and Espero Austin at W. 24th (collectively, the “Projects”).

On April 13, 2020 Caritas filed its appeal to Bobby Wilkinson, Executive Director, to reinstate the Applications (the “Initial Appeal Letter”). A copy of the Initial Appeal Letter is attached hereto as Exhibit A and incorporated herein by reference for all purposes. On April 27, 2020, Mr. Wilkinson affirmed the decision of staff to terminate the Applications on the basis “that the Applications do not meet the definition of Supportive Housing because the Applicant did not provide sufficient evidence that the Developments will be supported by Project-based rental or operating subsidies for twenty-five percent (25%) of the Units, and the Target Populations must be changed to either Elderly or general.” The definition of Supportive Housing is set forth in 10 TAC §11.1(d)(122)(E)(iii) (the “Regulation”).

Applicants hereby file this appeal to the Board to reinstate the Applications. Applicants’ appeal is based on the following: (i) the unambiguous ambiguity of the Regulation; (ii) the impossibility of performance to satisfy the Regulation as interpreted by staff; and (iii) the Operating Subsidy Agreements of Caritas submitted by Applicants comply in all respects with the requirements of Texas Government Code 2306.6705(4) (the “Statute”).

I. Ambiguity of the Regulation.

For convenience, the entire text of the Regulation is as follows:

(ii) financed with debt that meets feasibility requirements under Subchapter D of this chapter without exemptions and must also be supported by project-based rental or operating subsidies for all Units, and meet all of the criteria in subclauses (I) - (VIII) of this clause. [Note: The Board approved on January 16, 2020 a waiver effectively reducing the requirement from all Units to a minimum of 25% of all Units.]

In Mr. Wilkinson's letter to Caritas dated April 27, 2020 (the "Termination Affirmation Letter"), Mr. Wilkinson states, "I believe staff has *reasonably* interpreted the phrase to mean "project-based rental subsidy or *project-based* operating subsidy." In the Initial Appeal Letter, I argued that the Regulation is ambiguous, imprecise and incorrectly interpreted by staff. Mr. Wilkinson's statement constitutes an affirmation of my contention that the Regulation is in fact ambiguous. To say the Regulation was "reasonably interpreted" effectively acknowledges the Regulation can be interpreted differently, but in his opinion he thinks staff's interpretation is reasonable. That is a matter of opinion whether he finds the Regulation reasonably interpreted by staff or not. For the reasons later discussed, I find a reasonable person could interpret the Regulation differently. A regulation should be written with clarity to avoid ambiguity and misinterpretation.

To further support my argument that the Regulation is patently ambiguous, I think it is important to note Mr. Wilkinson had to insert language into his reading of the Regulation that is not present in the Regulation to make his point that staff "reasonably interpreted" the Regulation. Mr. Wilkinson inserted after the word "or" the words "project-based" prior to "operating subsidy." The Regulation does not say "or project-based operating subsidy," and instead it merely says "operating subsidy." By Mr. Wilkinson's insertion of those two additional words into the Regulation that are not actually in the Regulation, except in connection with rental subsidy, Mr. Wilkinson has taken inexplicable liberty with the Regulation to support his position. By doing so, he has unwittingly effectively acknowledged that the Regulation is ambiguous and imprecise.

Mr. Wilkinson goes on to say that both project-based rental subsidy and project-based operating subsidy "are terms of art used in the affordable housing world to mean assistance from a third party under a contract with an enforceable promise to pay a monthly or annual fixed amount." That broad statement is only partially correct. Project-based rental subsidy and project-based operating subsidies are terms of art, but again, he has injected the words "project-based" prior to "operating subsidy" when those words do not exist in the Regulation. How is a reader of the Regulation to know "operating subsidy" really means a "project-based operating subsidy?" I do not read the Regulation that way. As interpreted by Mr. Wilkinson and staff, the Regulation requires an external entity such as HUD or USDA to provide an operating subsidy to the exclusion of Caritas, the sponsor of the Applications, which is unquestionably capable of providing an operating subsidy. More on this issue under II.

In staff's defense, the Regulation is a new regulation which permits hard debt on a Supportive Housing project and it is understandable that a new regulation is subject to multiple interpretations. Marni Holloway in her letter dated April 6, 2020, in which she

notified the Applicants of the termination of their respective Applications states, “this is the first opportunity for the Board to interpret its rule, it is prudent course for staff to more strictly apply the definition and allow the Executive Director and Board to provide its input should you choose to appeal.” As I stated in the Initial Appeal Letter, a “strict application of the rule is one thing, but not when the interpretation is based on language not contained anywhere in the text. That is not a strict interpretation but instead is a misinterpretation, albeit innocently made.” I appreciate Ms. Holloway’s honesty, but similar to Mr. Wilkinson’s above quoted statements, it constitutes confirmation and effectively acknowledges that the Regulation is indeed ambiguous, imprecise and subject to multiple interpretations.

This is therefore a matter of first impression for the Board to interpret the Regulation. In contract law it is a well-established principal that a provision in a contract is construed against the drafter of the contract and therefore construed in favor of the non-drafting party. In this instance the drafter is staff and the other parties are the development community who seek to provide Supportive Housing in accordance with the Regulation. If typical contract law principles are applied, I respectfully request the Board to determine the Regulation is ambiguous, imprecise and open to multiple interpretations and determine that Applicants complied with the definition of Supportive Housing in accordance with the Regulation.

II. Impossibility of Performance Under Regulation.

In the Termination Affirmation Letter, Mr. Wilkinson next states, “project-based operating subsidies are typically provided by the public housing side of HUD, or certain USDA programs, and is memorialized as a contract based on the number of low-income units.” While there is no denying the two programs referenced in Mr. Wilkinson’s statement are project-based subsidies they are not typical of Supportive Housing. USDA funding is a moot point in an urban area like Austin and HUD’s Continuum of Care program is the most appropriate Federal governmental operating subsidy to reference in the case of Supportive Housing. There are also numerous other operating subsidy pools provided at the local level aimed at ending homelessness of which Caritas is a beneficiary. Aside from injecting “project-based” with respect to operating subsidies, Mr. Wilkinson is presumably unaware that it is impossible for Applicants and any applicant seeking tax credits to have HUD or any other external entity award an operating subsidy grant prior to a proposed project receiving a tax credit allocation and being built. HUD COC grants, in particular, are awarded with a deadline to use the funds within 12 months, which is impossible to align with the 9% tax credit application process.

The applicant under the tax credit program is typically either a limited partnership or a limited liability company with no assets. This is required by both tax credit investors and lenders. It is impossible for an applicant to file an application with HUD or any other governmental entity to obtain a grant for a project when HUD or such governmental entity does not know whether the project will receive credits or will ever be built. The process by which funding of operating subsidies is awarded is different from the award of project-based rental subsidies. It is typical for project-based rental subsidies to be awarded to the

owner of a project; however, this is not the case for project-based operating subsidies. In order for an applicant to have a project-based operating subsidy as part of its funding, such funding has to come from a nonprofit sponsor, which in this case, is Caritas. Caritas routinely applies for and receives operating subsidies for other apartment communities across Austin, including TDHCA funded projects. Caritas is committed to doing the same for the Projects, but it is impossible for Caritas to apply for those grants until after the Projects become a reality; and, as above-stated, if Caritas is unable to make application for such grants from HUD or other governmental entities with its long, successful history, then it is more impossible for Applicants to do so, with no history and no assets.

I assume this aspect of project-based operating subsidies is unknown to Mr. Wilkinson and staff because otherwise it would not make sense for Mr. Wilkinson or staff to insert the words “project-based” prior to “operating subsidy” to intentionally cause an applicant for tax credits for the development of Supportive Housing to have no possibility of receiving an allocation of tax credits. At the Board meeting, others will more fully speak to the project-based operating subsidy process and its timing for Supportive Housing projects.

Consequently, it is very reasonable for a person to conclude that if (i) the Regulation permits operating subsidies and the Regulation does not say “project-based operating subsidies, (ii) project-based operating subsidies are impossible to obtain for an applicant during the 9% tax credit application process, and (iii) staff permits operating subsidies for Supportive Housing projects without hard debt to be obtained by a nonprofit sponsor post-tax credit allocation, then staff similarly intended to permit operating subsidies for Supportive Housing projects with hard debt to be funded by a nonprofit sponsor on a post-tax credit allocation award basis.

Mr. Wilkinson further states in the Termination Affirmation Letter, “Accordingly, you interpret the phrase to allow an affiliate of the applicant to tender a contract to provide a benefit as later agreed upon, and for no project-based rental assistance vouchers to be required.” I am puzzled by this sentence because it clearly implies his interpretation of the Regulation is that it does require “project-based rental assistance vouchers” to meet this portion of the Supportive Housing definition. The Regulation clearly does not require vouchers. The Regulation provides for two alternatives, i.e., either project-based rental assistance *or* operating subsidies. The Regulation does not exclusively require Supportive Housing developments have vouchers. In addition to this discussion being applicable to the above ambiguity argument, it further demonstrates Mr. Wilkinson’s misinterpretation of the Regulation from what the Regulation actually says. The context for Mr. Wilkinson making this statement was to rebut my interpretation of the Regulation which is, as he says, “you believe it means ‘project-based rental subsidy or any other form of operating subsidy’.” On that point we agree.

Caritas and I emphatically interpret the Regulation as Mr. Wilkinson says because otherwise no applicant can meet the requirements of the Regulation for providing a project-based operating subsidy. Contract interpretation requires language to be interpreted in a manner which permits the parties to accomplish what is intended rather than prohibits the

parties from what is intended. Mr. Wilkinson's interpretation of the Regulation creates an impenetrable barrier to any applicant who seeks to use operating subsidies to financially support a Supportive Housing development carrying hard debt. If that is what staff intended when it drafted the Regulation, then why insert "or operating subsidy" in the Regulation. That last quoted language is unnecessary if the intent of staff was to require applicants to utilize only vouchers. I do not think that was staff's intent at all and therefore must conclude staff was and Mr. Wilkinson is unaware that their interpretation of the Regulation makes it impossible for an applicant and, specifically, Applicants to do that which the Regulation attempts to permit.

Later in the Termination Affirmation Letter, Mr. Wilkinson points out "that Application No. 20114 illustrates that there is at least one Texas community that may provide a singular voucher commitment to meet the 25% requirement." I take this sentence as substantiating my above claim of impossibility of performance. Please note that Mr. Wilkinson's statement refers to a voucher commitment which is consistent with his earlier statement that vouchers are required for Supportive Housing developments. As I contend, vouchers are not required per the clear language of the Regulation and Mr. Wilkinson's comparison of Application No. 20114 to the Applications is akin to comparing apples to oranges. The former has the ability to obtain vouchers from the Houston Housing Authority and the latter did not and had to avail itself of the operating subsidy alternative provided for in the Regulation.

You may be asking why did Applicants not seek project-based vouchers if project-based vouchers clearly comply with the Regulation. Project-based vouchers are awarded through public housing authorities from funding awarded by HUD. HUD gives local housing authorities broad authority to decide how those vouchers are awarded – project-based or tenant choice – and to whom they are awarded – priority for families or persons experiencing homelessness. Both the Austin and Travis County Housing Authorities have a long history of distributing their vouchers as tenant-choice and not for persons experiencing homelessness. This is not just an Austin choice. This same pattern can be seen in cities across Texas and throughout the nation and can be viewed as a barrier to the delivery of Supportive Housing addressing homelessness. Further, the number of vouchers available to the Austin and Travis County is much less than the voucher amounts available to larger urban areas. It is no surprise that Houston has an open voucher commitment to persons experiencing homelessness. That opportunity is simply not available in Austin. Caritas approached both Austin housing authorities for vouchers and their answer was that there were no vouchers available so early on in the project, but maybe vouchers will be available as the project nears completion. We are hopeful that the process in Austin will change to accommodate project-based voucher commitments for persons experiencing homelessness, but that opportunity is unavailable at this time.

III. Caritas Operating Subsidy Agreements.

Mr. Wilkinson next contends in the Termination Affirmation Letter that the Operating Subsidy Agreements Applicants submitted with their respective Applications fail to comply with the Statute. On the contrary, the Operating Subsidy Agreements submitted

with the Applications meets every aspect of the Statute: (i) it is a legally binding agreement securing an operational subsidy for each of the Projects; (ii) it identifies the source of funds – either vouchers, subsidies or a subsidy from Caritas of Austin in Section 1.3 on page 1; (iii) the annual amount of funds is referenced in 2.1(d) on page 2 and is also clearly denoted in the Rent Schedule attached as Exhibit A which designates the line item of units that will receive the Operational Subsidy - \$28,152 in monthly rent for Espero Austin at Rutland and \$18,216 in monthly rent for Espero Austin at W. 24th; (iv) the number of units receiving the funds is also denoted in the Operating Subsidy Agreement on Page 2 – 34 units for Espero Austin at Rutland and 22 units for Espero Austin at W. 24th; and (v) the term and expiration date of the Operating Subsidy Agreement is noted on Page 3 – 15 years from the Placed in Service Date.

These facts do not support Mr. Wilkinson’s last argument that the Applications failed to meet threshold because the Operating Subsidy Agreements do not comply with the Statute.

IV. Conclusion.

For the reasons cited above, it is Applicants’ position that the Regulation needs to be rewritten for the 2021 Qualified Allocation Plan to address the ambiguous and imprecise language of the Regulation. For this year, the Regulation should be construed in favor of Applicants and reinstated. As above argued, Mr. Wilkinson proves my point that the Regulation is ambiguous and imprecise by claiming that he found staff’s interpretation to be reasonable only by his injection of additional words into the Regulation to arrive at his conclusion. Ms. Holloway’s above quoted statement also supports the argument that the Regulation is unambiguously ambiguous, which is why she seeks the Board’s assistance with the interpretation of the Regulation.

We request the Board to conclude the Regulation should be interpreted to permit Applicants, without access to project-based rental subsidies, to avail itself of operating subsidies as the Regulation unequivocally provides if the Operating Subsidy Agreements submitted with the Applications comply with the requirements of the Statute. Further, we request the Board to conclude that the Operating Subsidy Agreements submitted by Applicants comply with the Statute. Accordingly, Applicants hereby respectfully request the Board to deny staff’s recommendation and to reinstate the Applications.

Very truly yours,

A handwritten signature in blue ink that reads "John C. Shackelford" followed by a stylized flourish or initials.

John C. Shackelford

JCS/klm

cc: Bobby Wilkinson, Executive Director (via email)
Marni Holloway, Director of Multifamily Finance (via email)
Sharon Gamble, Administrator, 9% Competitive Housing Tax Credit Program (via email)
Beau Eccles, Esq. (via email)
Jo Kathryn Quinn (via email)
Richard Manzardo (via email)
Jennifer Hicks (via email)
Michelle Snedden (of the Firm)
Kara Hargrove (of the Firm)

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City of Austin

Steve Adler, Mayor

301 W. 2nd St., Austin, TX 78701
(512) 978-2100, Fax (512) 978-2120
steve.adler@austintexas.gov

May 11, 2020

Ms. Leslie Bingham, Vice-Chair
Mr. Paul A. Braden, Board Member
Ms. Sharon Thomason, Board Member
Mr. Leo Vasquez, Board Member
Texas Department of Housing and Community Affairs
221 E. 11th Street
Austin, TX 78701-2410

Dear Board Members,

I am writing to express my overwhelming support for Caritas of Austin's two supportive housing developments which are before you on appeal at the May 21st meeting of the TDHCA Board of Directors: Espero Austin at W. 24th (TDHCA #20041) and Espero Austin at Rutland (TDHCA #20040.) I am asking that you consider the reinstatement of these two applications due to the significant impact that this supportive housing will have for people experiencing homelessness in our community. A rejection of these projects would be a substantial setback to shared state and local interests in addressing the many impacts of homelessness in Austin.

It is my understanding that the applications for these two projects have been terminated due to an interpretation of newly added language in the State's funding rules. It is also my understanding that Caritas of Austin applied under this rule in order to specifically expand the capacity of nonprofit sponsors to deliver services and support to populations in greatest need. Caritas of Austin has followed the rules as written, and these applications have both integrity and merit. I respectfully ask that you reinstate these supportive housing projects in the LIHTC program.

Addressing homelessness is a top priority for the City of Austin, but these projects address more than local needs, they also support the state's priorities. The high-ranking score of both applications within the LIHTC program competition indicates a strong alignment with the types of projects that TDHCA seeks to support. Caritas of Austin's projects represent a critical opportunity to target 100% of units to people experiencing homelessness. The urgent need for deeply affordable and supportive housing in Austin for persons experiencing homelessness cannot be overstated. I am grateful that our priorities are so well aligned in seeking to really move the needle on ending homelessness.

Caritas of Austin has applied for financing with the Austin Housing Finance Corporation (AHFC) through the Rental Housing Development Assistance (RHDA) program. These applications are currently under review by City of Austin staff and have been assessed very favorably thus far, with considerably high scores on the initial quantitative assessment. The

RHDA process includes three additional stages of qualitative assessment, which, due to the quality of the proposal and the population served, should result in a positive outcome for these applications. It has been the consistent practice of AHFC to prioritize support for applicants receiving competitive tax credit awards from TDHCA. Should these applications be reinstated, it is likely that AHFC will award the requested financing; however, no formal commitment will be made prior to the AHFC Board meeting in August. The City of Austin looks forward to leveraging funding for projects that increase our community's capacity to house people experiencing homelessness and add high-quality partners with a proven capability of providing supportive services.

Caritas of Austin is exceptionally well qualified to ensure the success of these two projects, as demonstrated by 98% of their supportive housing residents remaining in housing. Caritas of Austin has been serving our community for 55 years, forging deep and established relationships with a broad range of philanthropists, local government leaders, and community stakeholders. Their developments represent the power of public-private partnerships and broad community support that Caritas of Austin has uniquely leveraged throughout its history. I am confident that these projects will result in deeply affordable housing developments that will be an enduring asset to the Austin community and to the State of Texas.

Respectfully,

A handwritten signature in blue ink, appearing to read "Steve Adler". The signature is fluid and cursive, with the first name "Steve" written in a larger, more prominent script than the last name "Adler".

Steve Adler
Mayor
City of Austin



City of Austin

**Gregorio "Greg" Casar, Council Member
District 4**

301 W. 2nd St., Austin, TX 78701
(512) 978-2104, Fax (512) 978-2114
gregorio.casar@austintexas.gov

May 7, 2020

Ms. Leslie Bingham, Vice-Chair
Mr. Paul A. Braden, Board Member
Ms. Sharon Thomason, Board Member
Mr. Leo Vasquez, Board Member
Texas Department of Housing and Community Affairs
221 E. 11th Street
Austin, TX 78701-2410

Dear Board Members,

Thank you for your public service and leadership via the TDHCA Board of Directors in directing our state's Low Income Housing Tax Credit program in particular. As you know, LIHTC is a critical program for the distribution of safe and respectful housing which builds well-being and provides stability for thousands of people across the state of Texas. As the District 4 representative on Austin City Council, and in whose district Espero Austin at Rutland will be located, I know that this project will bring much needed housing and services to my constituents. I am writing to express my absolute support for Caritas of Austin's two Supportive Housing developments which are before you on appeal at the May 21st meeting of the TDHCA Board of Directors – Espero Austin at W. 24th (TDHCA #20041) and Espero Austin at Rutland (TDHCA #20040.)

It is my understanding that these two projects have been terminated due to an interpretation of newly added language in the State's funding rules and involves no wrongdoing or lack of integrity or merit in the proposed projects. This is unfortunate and hard to accept given the overwhelming need for these units and the strong nonprofit Sponsor that is behind these projects. I respectfully ask you as a Board member to reinstate these valuable projects. Projects that will not only help address local priorities, but are also high-scoring projects within the LIHTC program achieving the State's desired priorities and purpose.

Addressing homelessness is a top priority for City of Austin leadership, and I understand well the urgent need for deeply affordable and supportive housing in Austin for persons experiencing homelessness. Caritas' projects represent a critical opportunity to target 100% of two projects' units to people experiencing homelessness which is a desperate need in our community. These projects also go beyond the 222 units of a success-based, transformative supportive housing model; they enable our community to expand capacity and add high-quality providers that will actually begin to move the needle on ending homelessness. These units are simply not something our community would like to have, they are units that we need.



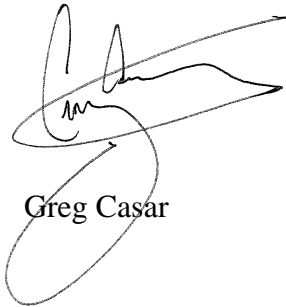
City of Austin

**Gregorio "Greg" Casar, Council Member
District 4**

301 W. 2nd St., Austin, TX 78701
(512) 978-2104, Fax (512) 978-2114
gregorio.casar@austintexas.gov

Caritas is exceptionally equipped to ensure the success of these two projects. Caritas of Austin has been serving our community for 55 years, forging deep and established relationships with a broad range of philanthropists, local government leaders and community stakeholders. Their developments represent the power of public-private partnerships Caritas has leveraged throughout its history. I am confident they have broad support that will result in enduring deeply affordable housing developments that will be an asset to our community as well as the State of Texas.

Respectfully,



Greg Casar



May 7, 2020

Ms. Leslie Bingham, Vice-Chair
Mr. Paul A. Braden, Board Member
Ms. Sharon Thomason, Board Member
Mr. Leo Vasquez, Board Member
Texas Department of Housing and Community Affairs
221 E. 11th Street
Austin, TX 78701-2410

Dear Board Members,

Thank you for your public service on the TDHCA Board of Directors. I am particularly grateful for your leadership in directing our state's Low-Income Housing Tax Credit program, which creates safe and stable housing for thousands of people across the state of Texas. As the District 9 representative on Austin City Council where Espero Austin at W. 24th will be located, I am writing to express my solid support for Caritas of Austin's two supportive housing developments before you on appeal at the May 21st meeting of the TDHCA Board of Directors: Espero Austin at W. 24th (TDHCA #20041) and Espero Austin at Rutland (TDHCA #20040).

It is my understanding that these two projects have been terminated due to an interpretation of newly added language in the State's funding rules rather than on project merit. Given the overwhelming need our community has for supportive housing units and the strong track record Caritas has earned, I respectfully ask you to reinstate these valuable projects, which will not only help address local priorities, but will advance the LIHTC program's primary goals and purpose.

Addressing homelessness is a top priority for City of Austin leadership, and our city has an urgent need for deeply affordable and supportive housing for individuals experiencing homelessness. Caritas's Espero projects would target 100% of the units in two development projects to individuals experiencing homelessness. These projects go beyond the 222 units of a success-based, transformative supportive housing model; they enable our community to expand capacity and to add high-quality providers that will begin to move the needle on ending homelessness in our city. These units are simply not something our community would like to have; they are units that we need.

Caritas is exceptionally equipped to ensure the success of these two projects and the individuals who will come to reside those communities. Caritas of Austin has been serving our community for 55 years, forging deep and established relationships with a broad range of philanthropists, local government leaders, and community stakeholders. Their developments represent the power of the public-private partnerships Caritas has leveraged throughout its history. I am confident they have broad support that will result in enduring, deeply affordable housing developments which will be an asset to our community as well as the State of Texas.

Thank you for your consideration. I would be pleased to provide you with any additional information you may require.

Respectfully,

A handwritten signature in black ink that reads "Kathie Tovo". The signature is written in a cursive style with a long horizontal flourish at the end of the name.

Kathie Tovo, Ph.D.
Council Member District 9

May 7, 2020

Ms. Leslie Bingham, Vice-Chair
Mr. Paul A. Braden, Board Member
Ms. Sharon Thomason, Board Member
Mr. Leo Vasquez, Board Member
Texas Department of Housing and Community Affairs
221 E. 11th Street
Austin, TX 78701-2410

Dear TDHCA Board Members,

Thank you for your public service and leadership via the TDHCA Board of Directors as you oversee and direct valuable resources critical to the expansion of affordable housing in our State. As CEO of LifeWorks, I am writing you to express my unqualified support for Caritas of Austin's two Supportive Housing developments which are before you on appeal at your May 21st meeting – Espero Austin at Rutland (#20040) and Espero Austin at W. 24th (#20041.)

LifeWorks and Caritas are long-time collaborative partners in Austin's efforts to ensure housing stability and success for the community's most vulnerable individuals and families. I acknowledge the need for deeply affordable housing in Austin; particularly that which is accessible to our client population. Caritas' projects are a critical opportunity to target 100% of two projects' units to people experiencing homelessness; and Caritas is exceptionally equipped to ensure their success. Our community will not be able to adequately address the rising population of persons experiencing homelessness until we remove barriers and expand capacity to deliver more units of this transformative and success-driven housing model by an organization who intimately understands the target population.

Our organization works closely with Caritas of Austin in a tight-knit and intentional safety net of nonprofit service and housing providers – each uniquely dedicated to serving persons experiencing homelessness. I can attest to the desperate need for these units and to the unparalleled credentials of Caritas of Austin in providing these units.

Caritas of Austin has been serving our community for 55 years, forging deep and established relationships with a broad range of philanthropists, local government leaders and community stakeholders. Caritas of Austin works collaboratively with our community's safety net providers and has the experience, funding and dedication required to deliver lasting solutions to ending homelessness.

I wholeheartedly support these two properties as a vital component of our community's strategy to house individuals and families. Please do not hesitate to reach out if you have any questions.

My thanks,



Susan McDowell
CEO



May 8, 2020

Ms. Leslie Bingham, Vice-Chair
Mr. Paul A. Braden, Board Member
Ms. Sharon Thomason, Board Member
Mr. Leo Vasquez, Board Member
Texas Department of Housing and Community Affairs
221 E. 11th Street
Austin, TX 78701-2410

Dear Board Members,

Thank you for your public service and leadership via the TDHCA Board of Directors as you oversee and direct valuable resources critical to the expansion of affordable housing in our State. As the leader of Integral care, the Local Mental Health Authority in Travis County, I am writing to express my support for Caritas of Austin's two Supportive Housing developments which are before you on appeal at your May 21st meeting – Espero Austin at Rutland (#20040) and Espero Austin at W. 24th (#20041.)

For more than 50 years, Integral Care has helped people build health and well-being so everyone has the foundation to reach their full potential. We support adults and children living with mental illness, substance use disorder and intellectual and developmental disabilities in Travis County. Our services include a 24-hour helpline for anyone who needs immediate support, ongoing counseling to improve mental health, drug and alcohol treatment to help with recovery, and housing to regain health and independence.

Our organization serves over 5,400 individuals experiencing homelessness, and we understand well the urgent need for low barrier deeply affordable housing in Austin. Caritas' projects are a critical opportunity to serve the most in need in our community; and we believe that Caritas is well positioned and equipped to meet this need. Our community will not be able to adequately address the rising population of persons experiencing homelessness until we remove barriers and expand our deeply affordable housing capacity.

Integral Care works closely with Caritas of Austin in a tight-knit and intentional safety net of nonprofit service and housing providers – each uniquely dedicated to serving persons experiencing homelessness. Caritas of Austin has been serving our community for 55 years, forging deep and established relationships with a broad range of philanthropists, local government leaders and community stakeholders. We support Caritas of Austin and stand behind their commitment, experience, and dedication to deliver lasting solutions to ending homelessness.

Respectfully,

David Evans
Chief Executive Officer

May 7, 2020

Ms. Leslie Bingham, Vice-Chair
Mr. Paul A. Braden, Board Member
Ms. Sharon Thomason, Board Member
Mr. Leo Vasquez, Board Member
Texas Department of Housing and Community Affairs (TDHCA)
221 E. 11th Street, Austin, TX 78701-2410

Dear Board Members,

Thank you for your service on the TDHCA Board of Directors, overseeing and directing valuable resources important to expanding affordable housing in Texas. I'm the Co-CEO of The SAFE Alliance (SAFE | stop abuse for everyone), a longstanding community-based nonprofit organization (and TDHCA grantee), located in Austin. I am writing this letter of support for Caritas of Austin's two Supportive Housing developments, which you are considering on appeal at your 5/21/2020 meeting – Espero Austin at Rutland (#20040) and Espero Austin at W. 24th (#20041.)

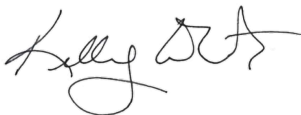
SAFE works to address and prevent sexual violence, human trafficking, and family violence (including child abuse, and domestic/dating violence), primarily in the City of Austin/Travis County. We know the urgent need for deeply-affordable housing in Austin, including housing that is accessible to the youth, adults and families whom we serve.

Caritas of Austin's aforementioned two projects target 100% of their units to people experiencing homelessness. This agency is highly-equipped and has the required expertise and understanding to ensure the success of this target population, which continues to grow in the Austin area. Caritas of Austin's projects will help offer solutions to ending homelessness in this community.

SAFE has partnered with Caritas of Austin for years, as part of a safety net of nonprofit service and housing providers that serve individuals and families who have endured homelessness. Caritas of Austin has served our Austin community for 55 years. In addition to working collaboratively with service providers, this agency also has strong relationships with many philanthropists, local government leaders, and other key community stakeholders.

SAFE appreciates your consideration of this letter of support.

Best regards,



Kelly White, Co-Chief Executive Officer



DOING
THE MOST
GOOD

William Booth, *Founder*
Brian Peddle, *General*
Commissioner Willis Howell *Territorial Commander*
Lt. Colonel Ronnie Raymer, *Divisional Commander*
Major Lewis Reckline, *Area Commander*

May 8, 2020

Ms. Leslie Bingham, Vice-Chair
Mr. Paul A. Braden, Board Member
Ms. Sharon Thomason, Board Member
Mr. Leo Vasquez, Board Member
Texas Department of Housing and Community Affairs
221 E. 11th Street
Austin, TX 78701-2410

Dear Board Members,

Thank you for your public service and leadership via the TDHCA Board of Directors as you oversee and direct valuable resources critical to the expansion of affordable housing in our State. As the Area Command Social Services Director of The Salvation Army, a community-based nonprofit organization in Austin, I am writing you to express my resounding support for Caritas of Austin's two Supportive Housing developments which are before you on appeal at your May 21st meeting – Espero Austin at Rutland (#20040) and Espero Austin at W. 24th (#20041.)

Our organization serves men, women and children experiencing homelessness, and I understand well the urgent need for deeply affordable housing in Austin; particularly that which is accessible to our client population. Caritas' projects are a critical opportunity to target 100% of two projects' units to people experiencing homelessness; and Caritas is exceptionally equipped to ensure their success. Our community will not be able to adequately address the rising population of persons experiencing homelessness until we remove barriers and expand capacity to deliver more units of this transformative and success-driven housing model by an organization who intimately understands the target population.

Our organization works closely with Caritas of Austin in a tight-knit and intentional safety net of nonprofit service and housing providers – each uniquely dedicated to serving persons experiencing homelessness. I can attest to the desperate need for these units and to the unparalleled credentials of Caritas of Austin in providing these units. We have many years of experience of collaboration with Caritas and recommend them without reservation.

Caritas of Austin has been serving our community for 55 years, forging deep and established relationships with a broad range of philanthropists, local government leaders and community stakeholders. Caritas of Austin works collaboratively with our community's safety net providers and has the experience, funding and dedication required to deliver lasting solutions to ending homelessness.

Respectfully,

Kathleen Ridings
Area Command Social Services Director



May 7, 2020

Ms. Leslie Bingham, Vice-Chair
Mr. Paul A. Braden, Board Member
Ms. Sharon Thomason, Board Member
Mr. Leo Vasquez, Board Member
Texas Department of Housing and Community Affairs
221 E. 11th Street
Austin, TX 78701-2410

Dear Board Members,

Thank you for your public service and leadership via the TDHCA Board of Directors as you oversee and direct valuable resources critical to the expansion of affordable housing in our State. As the leader of Front Steps, a community-based nonprofit organization in Austin, I am writing you to express my resounding support for Caritas of Austin's two Supportive Housing developments which are before you on appeal at your May 21st meeting – Espero Austin at Rutland (#20040) and Espero Austin at W. 24th (#20041.) At Front Steps, we are 100% committed to ending homelessness, and do this partly through our managing of the ARCH Shelter in Downtown Austin. We see many individuals who struggle to gain enough income to pay rent in Austin. Being our neighbor in this effort, Caritas also knows this challenge all too well, and is trying to do something about it.

At Front Steps we see the most vulnerable and in need homeless individuals in our city, and I understand well the urgent need for deeply affordable housing in Austin; particularly that which is accessible to our client population. Caritas' projects are a critical opportunity to target 100% of two projects' units to people experiencing homelessness; and Caritas is exceptionally equipped to ensure their success. Our community will not be able to adequately address the rising population of persons experiencing homelessness until we remove barriers and expand capacity to deliver more units of this transformative and success-driven housing model by an organization who intimately understands the target population.

Our organization works closely with Caritas of Austin in a tight-knit and intentional safety net of nonprofit service and housing providers – each uniquely dedicated to serving persons experiencing homelessness. I can attest to the desperate need for these units and to the unparalleled credentials of Caritas of Austin in providing these units.

Caritas of Austin has been serving our community for 55 years, forging deep and established relationships with a broad range of philanthropists, local government leaders and community stakeholders. Caritas of Austin works collaboratively



"Everyone deserves a safe place to call Home."

with our community's safety net providers and has the experience, funding and dedication required to deliver lasting solutions to ending homelessness.

If there is any question about whether or not Caritas's application should be approved, please take in to consideration their long and unqualified commitment and integrity in serving Austin's most vulnerable population.

Respectfully,

Greg McCormack, M.Ed.
Executive Director
Front Steps



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May 7, 2020

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Mr. Paul A. Braden, Board Member

Ms. Sharon Thomason, Board Member

Mr. Leo Vasquez, Board Member

Texas Department of Housing and Community Affairs

221 E. 11th Street

Austin, TX 78701-2410

Dear Board Members,

Thank you for your public service and leadership via the TDHCA Board of Directors as you oversee and direct valuable resources critical to the expansion of affordable housing in our State. As the leader of Family Eldercare, a community-based nonprofit organization in Austin, I am writing you to express my resounding support for Caritas of Austin's two Supportive Housing developments which are before you on appeal at your May 21st meeting – Espero Austin at Rutland (#20040) and Espero Austin at W. 24th (#20041.)

Our organization serves older adults and adults with disabilities, and I understand well the urgent need for deeply affordable housing in Austin; particularly that which is accessible to our client population. Caritas' projects are a critical opportunity to target 100% of two projects' units to people experiencing homelessness; and Caritas is exceptionally equipped to ensure their success. Our community will not be able to adequately address the rising population of persons experiencing homelessness until we remove barriers and expand capacity to deliver more units of this transformative and success-driven housing model by an organization who intimately understands the target population.

Our organization works closely with Caritas of Austin in a tight-knit and intentional safety net of nonprofit service and housing providers – each uniquely dedicated to serving persons experiencing homelessness. I can attest to the desperate need for these units and to the unparalleled credentials of Caritas of Austin in providing these units.

Caritas of Austin has been serving our community for 55 years, forging deep and established relationships with a broad range of philanthropists, local government leaders and community stakeholders. Caritas of Austin works collaboratively with our community's safety net providers and has the experience, funding and dedication required to deliver lasting solutions to ending homelessness.

Respectfully,

Kent Herring
Chief Executive Officer
Family Eldercare

generously supported by





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PERRY LORENZ

EXECUTIVE DIRECTOR

Matthew Mollica
860-287-2587
matthewmollica@austinecho.org

May 7, 2020

Ms. Leslie Bingham, Vice-Chair
Mr. Paul A. Braden, Board Member
Ms. Sharon Thomason, Board Member
Mr. Leo Vasquez, Board Member

Texas Department of Housing and Community Affairs
221 E. 11th Street
Austin, TX 78701-2410

Dear Board Members,

Thank you for your public service and leadership via the TDHCA Board of Directors as you oversee and direct valuable resources critical to the expansion of affordable housing in our State. As the leader of ECHO, a community-based nonprofit organization in Austin, I am writing you to express my resounding support for Caritas of Austin's two Supportive Housing developments which are before you on appeal at your May 21st meeting – Espero Austin at Rutland (#20040) and Espero Austin at W. 24th (#20041.)

Our organization serves as the CoC lead agency for Austin / Travis County, and I understand well the urgent need for deeply affordable housing in Austin; particularly that which is accessible to our client population. Caritas' projects are a critical opportunity to target 100% of two projects' units to people experiencing homelessness; and Caritas is exceptionally equipped to ensure their success. Our community will not be able to adequately address the rising population of persons experiencing homelessness until we remove barriers and expand capacity to deliver more units of this transformative and success-driven housing model by an organization who intimately understands the target population.

Our organization works closely with Caritas of Austin in a tight-knit and intentional safety net of nonprofit service and housing providers – each uniquely dedicated to serving persons experiencing homelessness. I can attest to the desperate need for these units and to the unparalleled credentials of Caritas of Austin in providing these units.

Caritas of Austin has been serving our community for 55 years, forging deep and established relationships with a broad range of philanthropists, local government leaders and community stakeholders. Caritas of Austin works collaboratively with our community's safety net providers and has the experience, funding and dedication required to deliver lasting solutions to ending homelessness.

Respectfully,

Matthew Mollica
Executive Director

May 11, 2020

Ms. Leslie Bingham, Vice-Chair
Mr. Paul A. Braden, Board Member
Ms. Sharon Thomason, Board Member
Mr. Leo Vasquez, Board Member
Texas Department of Housing and Community Affairs
221 E. 11th Street
Austin, TX 78701-2410

RE: Espero Austin at Rutland
 1934 Rutland Drive, Austin, TX 78758
 TDHCA #20040

Espero Austin at W. 24th
911-915 W. 24th Street, Austin, TX 78705
TDHCA #20041

Dear Board Members,

I am writing this letter as a Housing Policy Director with the University of Texas Student Government. I am also the UT Student Government representative on two neighborhood-related organizations – University Area Partners and Central Austin Neighborhood Plan Area Committee – where I had the opportunity to listen to the presentation given on Caritas of Austin’s two proposed projects. I am supportive of Caritas of Austin’s effort to expand the availability of high-quality affordable housing to our neighbors who need it the most.

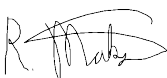
I am particularly interested in the project located at 911-915 W. 24th – Espero Austin at W. 24th. As a student that lives in the West Campus area that will house this project, I am very supportive of new housing opportunities that will bring deeply affordable units to this area. I also appreciate the deep impact that will be made by the proposed project – providing low cost housing with built-in supportive services that help individuals stabilize and integrate in our community.

Our community needs more high-quality housing providers stepping up to the plate to develop a pipeline of deeply affordable housing. The West Campus area is a dense, pedestrian-oriented neighborhood which I feel is a great location for the Espero Austin at W. 24th project. The new density added to West Campus has transformed the area into a high opportunity, transit-connected, pedestrian-oriented community that should be equitably available to all.

I thank you so much for your time and consideration of my voice and lived experience in the community. If you have any questions, please do not hesitate to contact me.

Most Sincerely,

Rylan Maksoud
rylanm@utexas.edu
713-447-6005





May 11, 2020

Ms. Leslie Bingham, Vice-Chair
Mr. Paul A. Braden, Board Member
Ms. Sharon Thomason, Board Member
Mr. Leo Vasquez, Board Member
Texas Department of Housing and Community Affairs
221 E. 11th Street
Austin, TX 78701-2410

RE: Espero Austin at Rutland
1934 Rutland Drive, Austin, TX 78758
TDHCA #20040

Espero Austin at W. 24th
911-915 W. 24th Street, Austin, TX 78705
TDHCA #20041

Dear Board Members,

I am writing this letter as the Senior Pastor of the University United Methodist Church, Austin. My congregation regularly serves people who are experiencing homelessness in the University neighborhood; and while our services are vital, it is always my desire for the people we serve to have the opportunity to live in safe and decent permanent housing. I am supportive of Caritas of Austin's effort to expand the availability of high-quality affordable housing to our neighbors who need it the most.

I am particularly interested in the project located at 911-915 W. 24th – Espero Austin at W. 24th. As a faith leader in the University area that will house this project, I am very supportive of new housing opportunities that will bring deeply affordable units to this area. I also appreciate the deep impact that will be made by the proposed project – providing low cost housing with built-in supportive services that help individuals stabilize and integrate in our community.

Our community needs more high-quality housing providers stepping up to the plate to develop a pipeline of deeply affordable housing. The West Campus area is a dense, pedestrian-oriented neighborhood which I feel is a great location for the Espero Austin at W. 24th project. The new density added to West Campus has transformed the area into a high opportunity, transit-connected, pedestrian-oriented community that should be equitably available to all.

I thank you so much for your time and consideration of my voice and experience in the community. If you have any questions, please do not hesitate to contact me.

Most Sincerely,


Rev. Dr. John Elford
Senior Pastor, University UMC, Austin Texas

EXHIBIT A



John C. Shackelford
9201 N. Central Expressway
Fourth Floor
Dallas, Texas 75231
(214) 780-1400 (Main)
(214) 780-1414 (Direct)
(214) 780-1401 (Fax)
jshack@shackelford.law

April 13, 2020

Via Email: bobby.wilkinson@tdhca.state.tx.us

Bobby Wilkinson, Executive Director
Texas Department of Housing and Community Affairs
221 East 11th Street
Austin, Texas 78701-2410

RE: Appeal of Terminations; TDHCA File Nos. 20040 and 20041;
Our File No. 52049.1

Dear Mr. Wilkinson:

This law firm represents Espero Austin at Rutland, LP and Espero Austin at W. 24th, LP (collectively, the “Applicants”), and I have been requested by Jo Kathryn Quinn, President and CEO of Caritas of Austin, Inc. (“Caritas”), to appeal the terminations of the respective Applications filed by Applicants for their projects, Espero Austin at Rutland and Espero Austin at W. 24th (collectively, the “Projects”).

The Applications for these Projects were terminated on the basis that the Applicants failed to satisfy the definition of Supportive Housing under 10 TAC §11.1(d)(122)(E)(ii) (the “Regulation”). In Marni Holloway’s letter dated April 6, 2020, to Applicants terminating their Applications, she states that the staff’s interpretation of the definition contained in the Regulation requires an applicant to have an “external authority” committed to funding an operating subsidy to the development. She further states, “Staff does not interpret the rule to allow an applicant or affiliate to propose a Supportive Housing development under the new definition that allows for debt, and also be the source of the ‘operating subsidy’ by a pledge of future funding.”

The entire text of the Regulation is as follows:

(ii) financed with debt that meets feasibility requirements under Subchapter D of this chapter without exemptions and **must also be supported by project-based rental or operating subsidies for all Units**, and meet all of the criteria in subclauses (I) - (VIII) of this clause. [Note: The Board approved on January 16, 2020 a waiver effectively reducing the requirement from all Units to a minimum of 25% of all Units.]

One reason why I disagree with Ms. Holloway’s and staff’s interpretation of the Regulation is that nowhere in the plain language of the Regulation does it state that an “external authority” cannot be an affiliate of the applicant. This is the situation we have in this instance. When the Applications were filed, Jennifer Hicks, the consultant for Applicants, submitted an Operating Subsidy Agreement from Caritas. Caritas is an “Affiliate” under the applicable definition in the

Bobby Wilkinson
April 13, 2020
Page 2

2020 Qualified Allocation Plan (the "QAP"). As an aside, the Operating Subsidy Agreement complies with Texas Government Code §2306.6705(4). I am unable to appreciate the basis for the termination of the Applications when the reason cited is that the Supportive Housing selected by Applicants fails to meet the definition set out in the Regulation. It appears staff has added an additional requirement to the Regulation clearly not in the Regulation. If neither the Regulation nor any of the remaining portions of 10 TAC §11.1(d)(122) mention "external authority," then it cannot be that an interpretation of the Regulations includes an additional condition that the "operating subsidy" must be provided by a source other than an Affiliate. Such an interpretation is clearly outside the plain language of the Regulation.

The Regulation is a new regulation which permits hard debt on a Supportive Housing project and it is understandable that a new regulation is subject to multiple interpretations. As Ms. Holloway says in her letter, "this is the first opportunity for the Board to interpret its rule, it is prudent course for staff to more strictly apply the definition and allow the Executive Director and Board to provide its input should you choose to appeal." A strict application of a rule is one thing, but not when the interpretation is based on language not contained anywhere in the text. That is not a strict interpretation but instead is a misinterpretation, albeit innocently made.

Another reason I take issue with staff's interpretation is that Supportive Housing projects without hard debt financing almost always includes a sponsor loan made up of charitable contributions, other fundraising opportunities and various forms of governmental funding assistance via the sponsor. Numerous Supportive Housing projects funded through both the 9% and 4% program have included an "Operating Subsidy Agreement" in very near the same form as the Operating Subsidy Agreement submitted with the Projects. In the instances before us, it seems illogical and contrary to common sense that because TDHCA now permits Supportive Housing projects to have hard debt that a sponsor can no longer provide funds to satisfy the "operating subsidy" requirement. Why would there be a distinction? In past Supportive Housing projects, nonprofit Sponsors, similar to Caritas, arranged and funded the capital, along with the sale of the tax credits, to finance the development, construction and operations of those projects. Again, why a distinction? And how were the Applicants or their consultant to know that staff would deem such Operating Subsidy Agreement unacceptable when the very definition of Supportive Housing incorporates a Nonprofit Sponsor that is "on the hook" for not only the capital funding gap, but more significantly the operations and supportive services critical to the success of these types of projects.

One other reason why it is my opinion that staff has misinterpreted the Regulation is because the Regulation states that it is only if the hard debt is either "not sourced by federal funds or is not provided by an Affiliate and originally sourced from charitable contributions or pass-through local government non-federal funds," that the applicant must then satisfy that the project will be supported either by "project-based rental or operating subsidies for 25% of the Units." The Regulation clearly permits the hard debt funds to come from an Affiliate if those funds were originally "sourced from charitable contributions or pass-through local government non-federal funds." It does not make sense for Regulations to require an "external authority" to provide the "operating subsidy" and not an Affiliate when the Affiliate is permitted to make a hard debt loan to the applicant directly. I do not understand why there is a distinction being made by staff between

an Affiliate making a hard debt loan directly but it not being permitted to provide an “operating subsidy” for 25% of the Units.

There has been great time and care put into the crafting of the Supportive Housing definition in the QAP in order to preserve the set-aside for mission-driven projects led by strong non-profit sponsors that will truly serve the target population intended. We implore staff to stand-by the strength of that definition and not terminate two applications that literally meet every single clause. In the case of these Applications, the 100% member and manager of each of the respective General Partners is Caritas – a long-standing and respected nonprofit supportive housing provider in the City of Austin. This structure does not deviate from the structure of past funded Supportive Housing developments without hard debt financing who have been approved to commit to fund their projects’ operations through similar operating subsidy agreements.

At the November 7, 2019 meeting of the Board, staff presented their Reasoned Response to the 2020 Draft QAP including comments specifically made on the new hard debt provision added to the Supportive Housing definition. I want to bring attention to two important features of that response which the Applicants and I fully agree with – 1) Rental vouchers and operating subsidies are feasibility considerations – they are not threshold considerations. These two high-scoring projects in great locations with full local support are being terminated for a feasibility conclusion before they even had the chance to be reviewed by Underwriting staff. This contradicts the way all other affordable housing (including Supportive Housing) projects have been handled in past cycles. 2) The point made by staff that Supportive Housing projects do not have just a singular source of operating subsidy, but in fact a variety is the very nature as to why an Operating Subsidy Agreement was utilized for the projects. The Operating Subsidy Agreement was a way to project-base all of those varied subsidies to the specific project as required by the definition. Staff appeared to understand that process in the Reasoned Response, but this thought pattern was not recognized in the deficiency issued for the Project. The Reasoned Response language is as follows:

“In response to Commenters’ (17) and (32) objection to all Units needing to be supported by project-based rental or operating subsidies if the Supportive Housing Development is to carry permanent debt, staff believes that that assurance of this continued support is important to a feasibility conclusion. Proposed Supportive Housing Developments are not limited to a single source of rental subsidy or operating support; in fact, it is common that a Development access a number of different sources throughout its operations. Staff believes that the definition is sufficiently flexible to allow for more than one form of operating assistance.”

As far as these Projects being financially sound, it is important to make you aware of the partners unequivocally dedicated to these Projects’ success: Caritas – 100% member of both of the respective General Partners of the Applicants, co-Developer and Supportive Service Provider – is an established, non-profit supportive housing provider that has been an integral piece of the City of Austin’s social service fabric for 56 years. Their strength is proven not only in the success of their programs but in their fundraising capabilities – averaging \$3,000,000 in private funds annually and \$7,400,000 in governmental grants alone in 2018. Caritas has been strategically planning for the development of these Projects by launching a capital campaign – Vision 2025 – to intentionally expand their housing footprint. Caritas is devoted to one mission: ending

homelessness. In order to achieve that mission, a community must have deep-impact, high-quality affordable housing with wrap-around supportive services. In order to increase local capacity and begin to build out a pipeline of this focused housing, Caritas partnered with The Vecino Group. The Vecino Group is a national developer, owner, and asset manager of Supportive Housing projects across the country. They have developed over a 1,000 units of Supportive Housing – many of those projects structured exactly the same as these Projects – tax credit financed with hard debt and a nonprofit sponsor with an operating subsidy ensuring deep targeting. Please see attached letters as Exhibits A and B, respectively, from Caritas and The Vecino Group with further detail and explanation.

It should also be noted that these Projects are two of the highest scoring projects in this year's tax credit program. Espero Austin at W. 24th is the highest scoring application and Espero Austin at Rutland is tied for the third highest (removing the 5 points for Readiness to Proceed that is based on location). Out of 138 applications, a #1 and #3 ranked application will be terminated based on an "interpretation." Both of the Projects would be funded in the Region 7 Urban allocation if allowed to move forward.

Aside from the arguments made above, there are policy reasons for why these Applications should not be terminated. As you are well aware, the homeless population in the City of Austin is at a critical and historical level. These projects would provide 222 units of high-quality, supportive housing for homeless persons that otherwise will not exist. It is exactly public-private partnerships like the one proposed between Caritas, The Vecino Group, the City of Austin and TDHCA that can make truly transformational projects such as these a desperately-needed reality. It is unquestionable that the City of Austin has an acute need for additional Supportive Housing. These two Projects, would not only provide relief to this issue, but would establish a pipeline and evidence-based best practice to begin moving the needle in addressing homelessness in the City of Austin.

There is broad support for these Projects with letters from the following individuals sharing important supplemental details as to the strength and success of Caritas, the need for more Supportive Housing and the detriment of the termination:

State Senator Kirk Watson - Exhibit C
State Representative Gina Hinojosa – Exhibit D
Rosie Truelove, Director of City of Austin Neighborhood Housing and Community Development Department – Exhibit E
Stephanie Hayden, Director of Austin Public Health – Exhibit F
Matthew Mollica, Executive Director of ECHO – Exhibit G
Eric Samuels, President and CEO of Texas Homeless Network – Exhibit H
Debbie Thiele, Managing Director of Corporation for Supportive Housing – Exhibit I

To summarize, it is the position of Applicants that staff has misinterpreted the Regulation primarily on the basis that the Regulation nowhere states that it requires an "external authority" to fund an "operating subsidy"; there is precedence for mission-based Supportive Housing funded by TDHCA to have sponsors commit to funding both capital AND operations; an operating subsidy

Bobby Wilkinson
April 13, 2020
Page 5

is inherently a feasibility issue and not a threshold issue; these are two of the highest scoring applications in Texas that are being terminated before their merit can be realized; there are public policy reasons underlying the support for these Projects; and these Projects are strongly supported by Senator Watson, State Representative Hinojosa and key leaders in the City of Austin's anchor affordable housing and supportive service agencies.

For the above reasons, I respectfully request your reinstatement of the Applications. If you determine the Applications should remain terminated, then please place this item on the next available Board's agenda.

Very truly yours,



John C. Shackelford

JCS/klm

cc: Marni Holloway, Director of Multifamily Finance (via email)
Sharon Gamble, Administrator, 9% Competitive Housing Tax Credit Program (via email)
Beau Eccles, Esq. (via email)
Jo Kathryn Quinn (via email)
Richard Manzardo (via email)
Jennifer Hicks (via email)
Michelle Snedden (of the Firm)
Kara Hargrove (of the Firm)

EXHIBIT A



611 Neches Street
PO Box 1947
Austin, TX 78767

Main: 512.479.4610
Fax: 512.472.4164

Board of Directors

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Melissa Ayala

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Tracy Snodgrass

Ramesh Swaminathan

John Trube

Anselmo Unite

Raquel Valdez Sanchez

Mike Haggerty
Emeritus

April 9, 2020

Mr. Bobby Wilkinson
Executive Director
Texas Department of Housing and Community Affairs

221 East 11th Street
Austin, Texas 78701

RE: Espero Austin at Rutland
1934 Rutland Drive, Austin, TX 78758
TDHCA #20040

Espero Austin at W. 24th
911-915 W. 24th Street, Austin, TX 78705
TDHCA #20041

Dear Mr. Wilkinson,

I respectfully implore you seriously consider granting our appeal filed for Espero Austin at Rutland and Espero Austin at W. 24th with regard to the 2020 9% Housing Tax Credit applications #20040 and #20041. The developments outlined in our applications will provide an unprecedented model of Supportive Housing in our region. Until now, our region has not performed well to make deeply affordable housing accessible to people experiencing homelessness. These developments change that. Caritas of Austin (Caritas) has been operating Supportive Housing for 14 years and has developed our expertise which permanently ends homelessness for people who have spent years on the streets of our city. Granting our appeal will allow Caritas of Austin to permanently end homelessness for a combined 222 individuals in Austin while increasing our City's capacity for employing evidence-based practices to effectively end homelessness in the aggregate by adding Caritas of Austin, a capable and strong non-profit housing partner, to the solution.

Our applications have been terminated due to an interpretation of newly added language to the 2020 Qualified Allocation Plan that is focused on the requirement of a Supportive Housing project to have either project-based vouchers or an operational subsidy on 25% of the units if it is to carry hard debt. Caritas of Austin met the intended simplicity of the newly added language by submitting an Operating Subsidy Agreement, committing ourselves to ensuring the subsidy through private fundraising if other local, state or federally sourced subsidies are not forthcoming. Furthermore, in our response to the deficiency, we provided substantial documentation of available sources of operational subsidy that will be tapped to not only subsidize 25% of the units, but a more aggressive goal of 100% being covered by some form of operational subsidy. Caritas of Austin has strong relationships with, and is a

long-time contractor with federal and city entities for operational subsidies for the homeless population.

I deeply appreciate TDHCA's Supportive Housing definition which ensures only mission-driven projects, with a history of Supportive Housing provision and experience with the target population, are prioritized to receive funding under this set-aside. However, the QAP does not provide any further clarification or definition as to what is expected of an "operational subsidy." For this subsidy to be sourced from a third party such as local, state or federal government entities, is not stated in the 2020 rules. This lack of clarity in the rules now threatens two of the highest scoring projects in the State and two projects in line to receive funding in Urban Region 7 (ranked #1 and #3). Additionally, I take exception to the staff's implication in this decision that third-party funding/vouchers is more predictable or stable than funding from the private sector. Caritas of Austin self-funding the operational subsidy is significantly more stable and predictable than an outside source over which we have no control. As well, there are many philanthropists and charitable corporate partners who prioritize just these kinds of tangible projects which have clear concise outcomes. I have complete confidence in Caritas' ability to raise these funds year over year.

Caritas of Austin builds wellbeing for people experiencing homelessness so they can reach their full potential. Caritas has been serving people experiencing poverty and homelessness in Austin since 1964. We have a stellar record of evolution with the needs of our community while remaining stubbornly focused on our mission. Through the years our organization has developed longstanding relationships with formidable philanthropists across the region and state. While, as stated above, we are grateful for our strong relationships with government entities; governmental levels of funding are never enough to meet the needs of our clients; and we must have the support of the private sector to maintain high-quality effective service and operations. Caritas is a local nonprofit with years of experience and success permanently ending homelessness for hundreds every year through Supportive Housing. We have a 98% success rate with people who have had extensive homeless experiences (chronic homeless) because our strategies are data-driven and our approach is comprehensive. Keeping people housed requires layers of support to build wellbeing; and Caritas has in-house programming for social supports, mental health, food access, education, job training, job placement and career development. These layers of support are anchored by the client and case manager partnership which is of utmost criticality; resulting in deep understanding and respect. Our high-quality reputation has resulted in the trust and investment of the philanthropic community in Austin and Central Texas.

I have been passionate about ending homelessness since 1979 when, as a young adult, I saw for the first time someone sleeping on the streets of New York. Now people are sleeping on the streets of every major and mid-sized city in Texas. A shared priority of the State of Texas and every major Texas City is to address homelessness. Caritas of Austin's work is transformational and ends homelessness. I hope that we can leverage the valuable resource of housing tax credits and partner with the State of Texas on an indisputable solution – high-quality affordable housing that builds wellbeing so people can reach their full potential--projects like Espero Austin at W. 24th and Espero Austin at Rutland.

I look forward to your favorable determination to our appeal. If you have any questions, please do not hesitate to contact me at jkquinn@caritasofaustin.org or 512-466-7080.

Respectfully,



Jo Kathryn Quinn, President/CEO
Caritas of Austin



EXHIBIT B



April 10, 2020

Texas Department of Housing and Community Affairs
221 East 11th Street
Austin, Texas 78701

RE: 9% HTC Application Deficiency Notice TDHCA
#20040-Espero Austin at Rutland
#20041-Espero Austin at W. 24th

Dear Executive Director Wilkinson,

This letter is a response to the staff decision to terminate the Espero Austin at Rutland (#20040) application and the Espero Austin at W. 24th (#20041) application. It is our strong belief that the applications meet the definition of Supportive Housing as outlined in the QAP, as well as satisfy the definition of Operating Subsidy located within the QAP. Respectfully, we ask that you consider the following evidence.

- In the termination letter, staff references the definition of Supportive Housing and sites the fact that developments must be supported by project-based rental or operating subsidies for a minimum of 25% of all units. The Espero applications have an operating subsidy agreement that meets this requirement. In terminating the application, staff overlooked the QAP provision that allows for an agreement securing the funds. This provision states "Such documentation shall, at a minimum, identify source and annual amount of the funds, the number of units receiving the funds, and the term and expiration date of the contract or other agreement." The operating subsidy agreement provided in the Espero applications meets the requirement as outlined in the QAP. In the letter, staff references a portion of our response that is not germane to our attempt to satisfy this provision. The paragraph they quote is merely background information on why vouchers were not available and therefore not relevant to our adherence to the QAP.

- In addition, Staff, diverting completely from the QAP, made the determination that such operating subsidy must now be external and cannot come from Caritas. This seems especially arbitrary when you consider that capital funding commitments for the application do not need to be external. If this had been in the rules, we would have sought an exterior funding backstop. If the rules are changing post application deadline, shouldn't we have an opportunity to change to an exterior subsidy? As you can see with our attachment, there are numerous ways we can achieve financial security.

- Vecino Group and Caritas chose to work with Jennifer Hicks in large part due to her 20 years experience developing Supportive Housing under the Texas QAP. Over those 20 years, Jennifer

305 W. Commercial St. Springfield MO 65803

417-720-1577 | www.vecinogroup.com



has followed, and nearly memorized the QAP, and never had a terminated application. We believe, with her guidance, we clearly followed the QAP in this instance as well. She did a tremendous job helping put the pieces of this development together and the adherence to the QAP should be honored by TDHCA.

- The absence of project-based vouchers in the City of Austin is not a reason to terminate the application. Instead, it is a compelling reason to fund the Espero Austin projects into existence. A Supportive Housing development that creates a sustainable source of rental assistance and supportive service funding, despite a lack of currently available resources, is a best practice model of creating Supportive Housing in the face of limitations. The takeaway is that the Espero Austin projects will leverage new resources.
- Since 2011, the Vecino Group has developed 18 Supportive Housing communities in 7 states. Under the Supportive Housing portfolio at Vecino Group, 1,196 units have been funded, ending homelessness for 430 households. Of note, 15 of these Supportive Housing developments carry permanent debt containing foreclosure provisions. For examples of successful Vecino Developments that have non-traditional sources of rental assistance, please see the attached document. These developments carry permanent debt, and often also fund services through related entities.
- To deny a project funding because a city does not have available designated funds is to deny housing to the most at-risk populations within said city. The very mission of the Austin and Travis County Housing Agencies depends on finding ways to create Supportive Housing in the absence of available rental assistance. Your QAP outlined a path to doing so. The Vecino Group and Caritas followed those QAP terms verbatim.

Our request is simple. Please do not allow what does not exist (project-based-rental assistance vouchers) to stand in the way of what clearly must exist (Supportive Housing for populations at risk of homelessness). We ask that your decision be guided by both the QAP produced by TDHCA and our shared conviction that all Texas residents deserve quality housing.

Thank you for your consideration.

Sincerely,

Rick Manzardo
The Vecino Group



THE VECINO GROUP
Housing for the greater good

Supportive Housing must contain several elements to be successful, the most important are a service provider and rental assistance to reach the target population. Each of our communities hosts a strong non-profit partner who provides services, on-site for our Supportive Housing developments. On an annual basis, over \$2.9 million in services is provided at these developments. As stated above, the other important component is rental assistance, as persons that are homeless must have rental assistance, or the housing will not be successful. Rental Assistance is gained in several different ways in Vecino Group communities. Of the 18 communities in our portfolio, 9 communities have a federal and/or state subsidy contract, 8 communities rely on operating/rent subsidy from the non-profit partner or other related entity and of many of the communities work with Bring It Home, Inc. to secure additional funding.

Bring It Home, Inc. is a nationwide non-profit partner. Bring It Home, Inc. raises money to assist Vecino Group communities and helps us secure rental assistance or services funding even after a deal is operational. Over the last year, Bring it Home, Inc. has provided \$207,249 in services funding and rental assistance to assist the overall budgets of our properties

To better understand how Vecino Group completes Supportive Housing communities and continues to operate them, please note the following examples:

Bodhi Salt Lake City is an 80-unit community. Out of the 80 units, 23 units are set-aside for persons that are chronically homeless and have a severe and persistent mental illness. The 51% general partner is a non-profit developer, Housing Connect. The community was funded through federal and state tax credits. In addition to Housing Connect, Utah Community Action is the on-site, full-time service provider. The services for Bodhi are paid through operating subsidy. When Bodhi was funded, vouchers were not available through the housing authority, to date the 23 units have received housing choice vouchers through the County Housing Authority. Bodhi has been in operation for over two years, with a 96% occupancy rate.

Freedom Place St. Louis is a 68-unit community dedicated to Veterans who are homeless. This community was funded through historic, state and federal tax credits. The services budget at Freedom Place is \$577,098 annually. The services budget is paid for through outside fundraising. In addition, the 68-unit community, when originally funded, did not have vouchers connected to the units. Our non-profit partner dedicated their vouchers through Missouri Department of Mental Health to the community. Freedom Place has been in operation since October of 2014, with no evictions, keeping Veterans permanently housed for over 6 years.

Talia Springfield is a 46-unit community, with 23 units set-aside for survivors of domestic violence. Talia was funded through federal and state tax credits. Talia hosts a 51% general partner, Harmony House, who is also the service provider on-site. The services budget for Talia is paid through an operating subsidy. At the time of application, Talia was funded without rental assistance for the 23-units. Since Talia has opened, the rental assistance has been

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Housing for the greater good.

funded through Harmony House Continuum of Care funds. Talia has been in operation since September of 2017, to date, there have not been any evictions from the set-aside units.

Operating subsidy and outside fundraising are what has made each of our communities successful, to deny a project funding based on the notion that it cannot be done, is denying Supportive Housing to households in Austin and halting any progress made in ending homelessness. These developments will decrease homelessness in Austin by a combined 222 lives uplifted. Vecino Group works to end homelessness nationally and looks forward to partnering with Caritas of Austin, TDHCA, and the City of Austin to continue our company's mission.

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EXHIBIT C



KIRK WATSON
STATE SENATOR • DISTRICT 14

NOMINATIONS - VICE CHAIR
EDUCATION
FINANCE
HIGHER EDUCATION

April 7, 2020

Bobby Wilkinson
Executive Director
Texas Department of Housing and Community Affairs
221 East 11th Street
Austin, Texas 78701

RE: Espero Austin at Rutland
1934 Rutland Drive, Austin, TX 78758
TDHCA #20040

Espero Austin at W. 24th
911-915 W. 24th Street, Austin, TX 78705
TDHCA #20041

Dear Mr. Wilkinson:

I am writing this letter to respectfully urge you to grant the appeal filed for Espero Austin at Rutland and Espero Austin at W. 24th with regard to the 2020 9% Housing Tax Credit applications #20040 and #20041. These two applications will deliver desperately-needed Supportive Housing that will immediately end homelessness for a combined 222 individuals in Austin, while also increasing the capacity to further alleviate homelessness by adding another strong non-profit housing partner to the solution.

I understand that both of these Applications have been terminated due to an interpretation of newly added language to the 2020 Qualified Allocation Plan that requires a Supportive Housing project that is carrying hard debt to have at least 25% of the units "be supported by project-based rental or operating subsidies." Given the lack of any guidance on this new language, I feel that Caritas of Austin met the intended simplicity of this requirement through their Operating Subsidy Agreement, which commits Caritas of Austin to financially supporting 25% of the units.

Further, it is my understanding from the termination letter sent by the Agency on April 6, 2020 that there might be some concern that the funds are not being committed from an "external entity." I have two issues with this interpretation. First, Caritas is separate and apart from the development. While Caritas is a partner of each Applicant partnership, it is a separate legal entity. Secondly, there is no stated requirement in the rules that the funding be committed from an "external entity." Even if the Agency does not believe Caritas to be legally distinct from the Applicants, such a distinction for purposes of providing the support for 25% of the units was not set forth as a requirement of the rule and therefore is an inappropriate standard to apply to the Applicants here.

TDHCA staff has crafted a Supportive Housing definition with several checks and balances that ensures that only mission-driven projects with a history of Supportive Housing provision and experience with the target population are able to receive funding under this set-aside. The QAP does not provide any further clarification or definition as to what is expected of an "operational subsidy." If the intent was for this subsidy to be local, State or Federally-sourced, then I encourage us to explore that change in next year's QAP without terminating two of the highest scoring projects in the State and two projects in line to receive funding in Urban Region 7 (ranked #1 and #3).

Caritas of Austin – as a local nonprofit with a track record of success and years of experience in addressing housing instability through supportive housing – is a supremely qualified nonprofit to deliver additional high-quality, deep-impact, intensely-supportive housing to our neighbors who need it most. Their success in keeping people housed is due to the wrap-around supports that stabilize lives. The food program ensures people have healthy food as they rebuild their lives. Education classes teach life skills so people can reach their full potential. Job placement and career development build strong futures for families. Most important is the core relationship between Caritas of Austin staff and the people they serve – a deep understanding and respect.

Caritas of Austin's work is transformational and ends homelessness. A shared priority of the State of Texas and every major Texas City is to address homelessness. I hope that we can leverage the valuable resource of housing tax credits in order for the State of Texas to partner on an indisputable solution – high-quality affordable housing with wrap-around supportive services as defined by projects like Espero Austin at W. 24th and Espero Austin at Rutland.

I look forward to your favorable determination to grant the applicant's appeal. If you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Kirk Watson". The signature is fluid and cursive, with the first name "Kirk" and last name "Watson" clearly distinguishable.

Senator Kirk Watson

EXHIBIT D



GINA HINOJOSA



STATE REPRESENTATIVE • DISTRICT 49

April 13, 2020

Bobby Wilkinson
Executive Director
Texas Department of Housing and Community Affairs
221 East 11th Street
Austin, Texas 78701

RE: Espero Austin at Rutland
 1934 Rutland Drive, Austin, TX 78758
 TDHCA #20040

Espero Austin at W. 24th
911-915 W. 24th Street, Austin, TX 78705
TDHCA #20041

Dear Mr. Wilkinson:

I have recently learned that Espero Austin at Rutland and Espero Austin at W. 24th - two projects that will deliver desperately-needed Supportive Housing to the City of Austin – have been terminated due to an interpretation of newly added language to the 2020 Qualified Allocation Plan that is focused on the requirement of a Supportive Housing project to have either project-based vouchers or an operational subsidy on 25% of the units if it is to carry hard debt. *I write today to express both my belief in the important work that Caritas of Austin is doing every day to end homelessness and to the need for affordable housing options, including and especially, permanent supportive housing in the district that I represent.*

Caritas of Austin is a local nonprofit with much community support that has a track record of success and years of experience in addressing housing instability through supportive housing. Caritas of Austin touts an outstanding 98% success rate in housing persons who have experienced long-term homelessness.

The need for these services is large and growing according to the most recent “Point in Time” count which demonstrated a 5% increase. Many of those living in a state of homelessness are within the district that I represent which has the largest counted population of people experiencing homelessness in Austin. Both Espero projects are within the district that I represent.

While I understand there are other worthy proposals for Austin for you to consider and your determination must take into account various factors, to the extent that the experience of the applicant and the extreme need for the services are relevant considerations, I submit this letter.

Thank you for your consideration,

A handwritten signature in black ink, appearing to read "Gina Hinojosa".

Gina Hinojosa
State Representative, District 49

EXHIBIT E



City of Austin

Neighborhood Housing and Community Development

P.O. Box 1088, Austin, TX 78767 -1088

(512) 974-3100 ♦ Fax (512) 974-3112 ♦ www.cityofaustin.org/housing

April 9, 2020

Bobby Wilkinson
Executive Director
Texas Department of Housing and Community Affairs
221 East 11th Street
Austin, Texas 78701

RE: Espero Austin at Rutland
1934 Rutland Drive, Austin, TX 78758
TDHCA #20040

Espero Austin at W. 24th
911-915 W. 24th Street, Austin, TX 78705
TDHCA #20041

Dear Mr. Wilkinson:

I am writing this letter to supplement the previous letter I submitted with the Deficiency Response for Caritas of Austin's two proposed 2020 Housing Tax Credit affordable housing developments – Espero Austin at Rutland and Espero Austin at W. 24th. I recently learned that the Deficiency Response was not accepted and both applications have been terminated. Termination of these two projects will be a detrimental blow to the City of Austin's progress in building a pipeline of high-quality, supportive housing that will serve exclusively persons previously experiencing homelessness.

I want to stress the importance of these two projects in the City of Austin's collective response to ending homelessness. They will not only provide housing stability for persons with extremely low incomes, but will dig deeper. These two projects will serve persons coming directly off the Coordinated Entry system – a nationally-recognized community prioritization tool that distinguishes the most vulnerable of our City's homeless. While we have many high-quality affordable housing communities in the City of Austin, not enough units have been dedicated exclusively to this population. As a housing provider that is intimately familiar and unilaterally dedicated to ending homelessness, Caritas of Austin is uniquely positioned to serve highly vulnerable people experiencing homelessness who have multiple barriers to stable housing. Likewise the City of Austin is uniquely positioned with multiple funding sources to include local and federal to infuse crucial gap financing, with a scoring mechanism that prioritizes these units for funding.

I would also like to emphasize the strength of Caritas of Austin. The agency is a leading nonprofit homeless housing and service provider who have a singular goal – ending homelessness. They have been a trusted provider of supportive housing in Austin for more than

The City of Austin is committed to compliance with the Americans with Disabilities Act and will provide reasonable modifications and equal access to communications upon request.

13 years and have had unparalleled success in keeping Austin's hardest to serve with roofs over their head. Espero Austin at Rutland and Espero Austin at W. 24th are not just supportive housing units we hope to have - they are mission critical and fundamental in moving the needle on alleviating homelessness.

In my previous letter, I provided information on all the subsidy resources that Caritas of Austin already taps and that will be available to persons living in these two communities. I explained that these resources are tenant-based by nature. Caritas of Austin is intimately familiar with the way subsidy funding in Austin flows and that is why they submitted an Operating Subsidy Agreement to "project-base" the ample funding that will flow to them in the form of operating subsidies from local and federal-pass through dollars. To require a project-based subsidy from an external source at the time of application for tax credits (approximately two years before a project is actually placed in service) is not in alignment with the way local housing subsidies are administered. However, I will stress that the City of Austin has an infused capital program with \$250 million Affordable Housing General Obligation Bond Program approved in 2018. These local resources are aimed directly at funding affordable housing developments that serve Austin's low-income communities. This is in addition to its Housing Trust Fund and federal dollars that directly support affordable housing developments applying for local gap financing.

As an additional testament to the strength, value and success of Caritas of Austin in our community, please know that the City of Austin just awarded the first contract providing emergency rent relief to address the economic impacts of COVID-19 in our community. Caritas of Austin was selected to administer this program. In this time of crisis, we are looking to Caritas of Austin. We hope that TDHCA will make this same choice when considering this appeal.

Caritas of Austin's two proposed housing developments provide an ideal opportunity for the City of Austin to partner with the State of Texas to address chronic homelessness in a comprehensive and thoughtful manner. We look forward to the opportunity to leverage our existing capital resources and future operational subsidies to ensure these developments are successful.

If you have any questions, please do not hesitate to contact me.

Sincerely,



Rosie Truelove
Director

EXHIBIT F



OFFICE OF THE DIRECTOR

P.O. Box 1088

Austin, Texas 78767

Phone (512) 972-5010

Fax (512) 972-5016

April 10, 2020

Bobby Wilkinson
Executive Director
Texas Department of Housing and Community Affairs
221 East 11th Street
Austin, Texas 78701

RE: Espero Austin at Rutland
1934 Rutland Drive, Austin, TX 78758
TDHCA #20040

Espero Austin at W. 24th
911-915 W. 24th Street, Austin, TX 78705
TDHCA #20041

Dear Mr. Wilkinson:

I am delighted to write this letter to support Caritas of Austin and the two proposed 2020 Housing Tax Credit affordable housing development projects; 1) Espero Austin at Rutland and 2) Espero Austin at W. 24th.

Austin Public Health has a long-standing relationship with Caritas of Austin. Caritas of Austin is a key agency in the City of Austin's team of nonprofits. This agency is working tirelessly to end homelessness in our community. Their outstanding achievements include the following:

- Maintaining a professional relationship with the City of Austin for over 20 years.
- They are the recipients of over \$3.9 in annual contracts with Austin Public Health. These contracts provide rental subsidies and supportive service funding for Caritas of Austin's various strategies for providing supportive housing.
- Caritas of Austin is the lead and fiscal agent for Austin Public Health's largest supportive housing program; Best Single Source Plus. A collaborative preventing and ending homelessness in Austin and Travis County since 2005.

The City of Austin is in dire need of high-quality, affordable housing with wrap-around supportive services that will serve persons experiencing homelessness. These projects will not only meet this goal but will also add much-needed capacity to Austin's mission-based affordable housing developers.





While others may be uncertain of Caritas of Austin's ability to attract operating and rental subsidies for their new projects, we feel very confident in their abilities.

Caritas has decades long tradition of providing support to those in need in our community. The strength, success and dedication of Caritas of Austin is unparalleled in their work to ending homelessness in Austin. They are beyond qualified to take the next step into owning their own supportive housing communities. Their long history of contracts with Austin Public Health provides testament to the operating and supportive service fundraising ability that will benefit the proposed projects.

Austin Public Health fully supports Caritas of Austin in their endeavor to develop and own new supportive housing in our community. Caritas of Austin has demonstrated strength in our community, a successful track record and their commitment to ending homelessness. Your consideration of this proposal is greatly appreciated.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Stephanie Y. Hayden', is written over a horizontal line. The signature is fluid and cursive.

Stephanie Y. Hayden, LMSW
Director - Austin Public Health



EXHIBIT G



ECHO Board of Directors

April 9, 2020

ALBERTA PHILLIPS, CHAIR
Journalist/Community
Advocate

Bobby Wilkinson
Executive Director
Texas Department of Housing and Community Affairs
221 East 11th Street
Austin, Texas 78701

COSSY HOUGH, LCSW
VICE CHAIR
UT School of Social Work

SHANNON SEDWICK,
SECRETARY
Esther's Follies

RYANN RANGEL
Privateer Capital

PEGGY DAVIS BRAUN
PDB Creations. LLC

DANIEL RYNE LUCIO
Google Fiber

BOBBY DILLARD
Cielo Properties

ED MCHORSE
McGinnis Lochridge

GREG HARTMAN
Vice Chancellor for Strategic
Initiatives, TX A&M System

LYNN MEREDITH
Community Advocate

C. LANE PRICKETT
Attorney

JOY RUCKER
Texas Harm Reduction
Alliance

MARK LITTLEFIELD
Littlefield Consulting

BETTY STAHR
Community Advocate

EX-OFFICIO MEMBERS

A.J. JOHNSON
TIM LEAGUE
PERRY LORENZ

EXECUTIVE DIRECTOR

Matthew Mollica
860-287-2587
matthewmollica@austinecho.org

RE: Espero Austin at Rutland
1934 Rutland Drive, Austin, TX 78758
TDHCA #20040

Espero Austin at W. 24th
911-915 W. 24th Street, Austin, TX 78705
TDHCA #20041

Dear Mr. Wilkinson:

I have recently learned the devastating news that Caritas of Austin's two proposed 2020 Housing Tax Credit affordable housing developments – Espero Austin at Rutland and Espero Austin at W. 24th – have been terminated. I represent the Ending Community Homelessness Coalition (ECHO) – the lead agency in Austin in charge of implementing community-wide strategies to end homelessness in Austin and Travis County. Caritas of Austin is a fundamental partner in this work delivering a package of wrap-around services and housing programs that deliver hope and homes to persons experiencing homelessness on a daily basis.

I am wholly supportive of the two new Projects and the tremendous impact that they will have on the way the City of Austin addresses homelessness. In my daily struggle to realize solutions to ending homelessness, I know that Supportive Housing is an incomparable evidence-based strategy that keeps persons experiencing homelessness compassionately housed and off streets and out of shelters. In the City of Austin, as in most Cities across Texas, the major hurdles to creating more Supportive Housing units to end homelessness are three-fold:

- 1) **CAPACITY:** There are not enough mission-based nonprofits doing this work. Supportive Housing development, ownership and management is unique. It is paramount that the provider intimately understands the population and has a success-based strategy for serving this population. Caritas of Austin is a leader in their work and supremely qualified. We cannot keep relying on the same providers to deliver units, we will never scale up and we will never make a dent. The two projects by Caritas of Austin is an intentional measure to respond to our affordable housing crisis and begin delivering units on a larger scale by a qualified provider.
- 2) **FUNDING:** In order to move the needle on addressing homelessness, we need to change the way we develop projects. By allowing Supportive Housing projects to carry a sliver of hard debt, you are freeing up valuable contributions in our community to funnel toward the life-giving operational subsidies and supportive services crucial to this housing. Caritas of Austin is a powerful fundraiser due to the success and impact of their work. We must accept other ways of capitalizing and funding Supportive Housing to break through this hurdle. The new language in the QAP that allows hard debt for Supportive Housing does just this. I kindly ask the TDHCA ED and Board to stand by their just decision to add this clause to the QAP, and allow these two very worthy projects to proceed.
- 3) **TARGET POPULATION:** ECHO's work is focused on systems that address homelessness. One of our primary tools in that system is our Coordinated Entry and Assessment – a prioritization tool that measures a homeless person's vulnerability. This system allows resources to be pooled for persons who need it the most. Caritas is unwavering in their participation and dedication to this prioritization tool. There is a dire need for Supportive Housing units that are dedicated to this system. Every person that comes off this list and into housing is a life saved and one-by-one our homeless count is reduced. Only with projects like Espero Austin dedicated to this community-based system, will we make progress.



ECHO Board of Directors

ALBERTA PHILLIPS, CHAIR
Journalist/Community
Advocate

COSSY HOUGH, LCSW
VICE CHAIR
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Privateer Capital

PEGGY DAVIS BRAUN
PDB Creations. LLC

DANIEL RYNE LUCIO
Google Fiber

BOBBY DILLARD
Cielo Properties

ED MCHORSE
McGinnis Lochridge

GREG HARTMAN
Vice Chancellor for Strategic
Initiatives, TX A&M System

LYNN MEREDITH
Community Advocate

C. LANE PRICKETT
Attorney

JOY RUCKER
Texas Harm Reduction
Alliance

MARK LITTLEFIELD
Littlefield Consulting

BETTY STAEHR
Community Advocate

EX-OFFICIO MEMBERS

A.J. JOHNSON
TIM LEAGUE
PERRY LORENZ

EXECUTIVE DIRECTOR

Matthew Mollica
860-287-2587
matthewmollica@austinecho.org

I am appreciative of your time and hope that the State of Texas will partner with the excellent tools and resources in place in Austin to deliver these two significantly impactful projects to our City.

If you have any questions, please do not hesitate to contact me.

Most Sincerely,

Matthew Mollica
Executive Director

EXHIBIT H



Board of Directors

April 10, 2020

Officers

Chair

Todd Shell
Houston

Bobby Wilkinson
Executive Director
Texas Department of Housing and Community Affairs
221 East 11th Street
Austin, Texas 78701

Vice Chair

Ben King
Houston

RE: Espero Austin at Rutland
1934 Rutland Drive, Austin, TX 78758
TDHCA #20040

Secretary

Taylor Cook
Austin

Espero Austin at W. 24th
911-915 W. 24th Street, Austin, TX 78705
TDHCA #20041

Treasurer

Bill Hubbard
San Marcos

Dear Mr. Wilkinson:

Members

Stephanie Day
Houston

I am writing this letter in support of Caritas of Austin's two proposed 2020 Housing Tax Credit affordable housing developments – Espero Austin at Rutland and Espero Austin at W. 24th. Texas Homeless Network (THN) is a statewide non-profit helping communities strategically plan to prevent and end homelessness. We believe these two projects represent a path forward to alleviating homelessness in Austin by leveraging local homeless response systems' planning and resources with State of Texas housing tax credit dollars. The Espero Austin projects provide an important opportunity for the State of Texas to become a champion and best practice model of addressing homelessness across the state.

Tamara Foster
Houston

Daniel Kuehn
Austin

Nathan Pisik
Austin

I have learned that both of these crucial projects have been terminated due to an interpretation of the newly added language in the definition of Supportive Housing related to an operating subsidy requirement for Supportive Housing projects to have hard debt. I want to make two important points related to this new language and these two specific projects:

Heather Slay
Houston

Greg Thoennes
Austin

1) As a State, we need to begin looking at new opportunities to scale up our production of deeply affordable rental housing with wrap-around Supportive Services that dig deep to explicitly target persons experiencing homelessness. By allowing mission-based Supportive Housing with strong nonprofit partners to carry hard debt, you are freeing up those organizations to instead fundraise for the operating subsidies and supportive service dollars that are paramount to success. We need more units. We need to build out more capacity in our Texas Cities. We need to leverage new dollars.

President & CEO

Eric Samuels

2) Caritas of Austin is an anchor homeless service and supportive housing provider with merit and recognition across the state for the work they do every single day in Austin to end homelessness. I consider their housing programs a best practice example of an intentional and evidence-based tool to increasing housing

stability and alleviating homelessness. Caritas has been a partner of THN for decades and I consider them one of the strongest nonprofits in the State to do this work. To deny Caritas of Austin the opportunity to deliver these two Projects, would be a serious mistake and a grave hindrance to the work to be done to end homelessness across the State.

I am hopeful that you consider my testament of the strength and distinction of Caritas of Austin as an organization uniquely and supremely qualified to develop these Projects and of the importance of the State of Texas to lead the work in addressing homelessness across our great State.

If you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in cursive script that reads "Eric Samuels".

Eric Samuels

EXHIBIT I



April 9, 2020

Bobby Wilkinson, Executive Director
Texas Department of Housing and Community Affairs
221 East 11th Street, Austin, Texas 78701

RE: Caritas of Austin letter of support

Dear Mr. Wilkinson:

I am writing this letter in support of Caritas of Austin and their efforts to bring new supportive housing to the City of Austin and the State of Texas. Corporation for Supportive Housing (CSH) is a national nonprofit dedicated to advancing solutions that use housing as a platform for services to improve the lives of the most vulnerable people, maximize public resources and build healthy communities. Because of our goals we are deeply invested in partners who share our vision to use housing as the proven cost-effective solution to ending homelessness, alleviating poverty and creating healthier communities.

CSH has been a tireless advocate in increasing opportunities for the provision of supportive housing in states and cities across the nation, and we know we can't do it alone. We see the need for local partners with capacity and tenacity to drive the work forward. Caritas has been such a partner. They have a well-established track record as a housing provider with familiarity and experience understanding the needs of vulnerable populations, and a dedication to meeting the needs of those populations by raising funds for crucial subsidies and supportive services.

CSH has had the pleasure of working with Caritas of Austin in the local Pay for Success program – a model for public-private partnership which funds social services dedicated to the highest priority of Austin's chronic homeless population in a performance-based contract. We have seen first-hand the commitment, experience and vitality of this organization in their work to end homelessness.

We believe Caritas of Austin's current plans to create new supportive housing offer a step forward in the State's responses to homelessness and its efforts to address the needs of its most vulnerable residents. We encourage TDHCA to continue to work with Caritas to refine their important plans, if at all possible, and to further these types of important efforts develop quality supportive housing. If you have any questions or would like to discuss this further, please do not hesitate to contact me.

Most Sincerely,

A handwritten signature in dark ink that reads "Debbie Thiele".

Debbie Thiele
Managing Director, Western U.S.
206.234.2518, debbie.thiele@csh.org

BOARD ACTION ITEM
MULTIFAMILY FINANCE DIVISION
MAY 21, 2020

Presentation, discussion, and possible action on timely filed appeal of material deficiencies in HTC Applications 20114 3300 Caroline under the Department's Multifamily Program Rules

RECOMMENDED ACTION

WHEREAS, the appeal relates to Competitive Housing Tax Credit (HTC) application 20114 3300 Caroline, was submitted to the Department by the Full Application Delivery Date;

WHEREAS, staff determined that the Application should be terminated because the Applicant did not provide sufficient evidence that the Application meets the Supportive Housing requirement that the Development will be supported by project-based rental or operating subsidies for 25% of the Units, and the Development does not qualify as either Elderly or general, subject to the Applicant's ability to appeal;

WHEREAS, the Applicant timely filed an appeal; and

WHEREAS, the Acting Director denied the appeal;

NOW, therefore, it is hereby

RESOLVED, that the appeal for 20114 3300 Caroline is hereby denied.

BACKGROUND

HTC Application 20114 3300 Caroline proposes the New Construction of 149 Units for a Supportive Housing population. The Development would be located in Houston and all 149 Units would be restricted.

10 TAC §11.1(d)(122) related to the definition of Supportive Housing, identifies the requirements for a Development to be considered Supportive Housing. Under 10 TAC §11.1(d)(122)(E):

(E) Supportive Housing Developments must meet the criteria of either clause (i) or (ii) of this subparagraph:

(i) not financed, except for construction financing, with any debt containing foreclosure provisions or debt that contains must-pay repayment provisions (including cash-flow debt). Permanent foreclosable, must-pay debt is permissible if sourced by federal funds, but the Development will not be exempted from Subchapter D of this chapter (relating to Underwriting and Loan Policy). In

addition, permanent foreclosable, cash-flow debt provided by an Affiliate is permissible if originally sourced from charitable contributions or pass-through local government non-federal funds. Any amendment to an Application or Underwriting Report resulting in the addition of debt prohibited under this definition will result in the revocation of IRS Form(s) 8609, and may not be made for Developments that have Direct Loans after a LURA is executed, except as a part of an approved Asset Management Division work out arrangement; or
(ii) financed with debt that meets feasibility requirements under Subchapter D of this chapter without exemptions and must also be supported by project-based rental or operating subsidies for a minimum of 25% of all Units, and meet all of the criteria in subclauses (I) - (VIII) of this clause:

The Application included a narrative stating the Applicant's intention for a long term Section 8 Project Based Housing Assistance Payment contract through the Houston Housing Authority, but included no evidence of such. In response to a deficiency notice, the Applicant informed staff that the Applicant submitted a proposal in response to the Houston Housing Authority's Request for Proposals (RFP) to distribute 1,000 project-based vouchers. However, the RFP was issued after the Application Acceptance Period had ended. Further, to date we do not have confirmation that the applicable project based vouchers have been issued by the housing authority.

The appeal focuses on the prospective nature of the wording of some criteria in 10 TAC §11.1(d)(122)(E)(ii), and notes that the Application included a letter from the Houston Housing Authority (HHA) supporting the idea that the proposed development submit a proposal for project based vouchers in a forthcoming Request For Proposal (RFP). As additional information with the appeal, HHA submitted a letter explaining the RFP process, and materials indicating that 3300 Caroline has now submitted an application seeking project based vouchers for all 149 units. Finally, the appellant claims to have satisfied 10 TAC §11.204(8) regarding threshold requirements for project-based vouchers by including with the application documentation that "identif[ies] the source and annual amount of the funds, the number of units receiving the funds, and the term and expiration date of the contract or other agreement." This is all in support of the argument that the Applicant submitted their request to HHA to obtain project based vouchers for a minimum of 25% of all units as soon as the Housing Authority made them available, and that these vouchers should be awarded, or not, by Commitment.

10 TAC §11.204(8)(F) notes that if a rental assistance is proposed to exist for the Development, "any related contract or other agreement securing those funds or proof of application for such funds must be provided." While it may be that "the Applicant submitted everything it could [with the Application] to indicate that project based vouchers were expected for this Development," as stated in the appeal, the timing of the RFP precluded submission of a contract or even the application for the RFP. Moreover, the wording of the (E)(ii) definition requires that the proposed development "must also be supported" by these vouchers.

Additionally, Section 2306.675(4) of the Tex. Gov't Code requires that the Applicant identify in the application three items: (A) the source and annual amount of the funds; (B) the number of units receiving the funds; and (C) the term and expiration date of the contract or other agreement. Because the RFP describing the available funding and terms for the project-based

vouchers did not exist prior to the Application Delivery Date, the Application's description of the first two items are speculative (and it does not appear that the Application described the third item). Knowing the source of project-based rental assistance (the Housing Authority administers several types of vouchers with different population requirements and payment terms) , the annual amount of the funds, the number of units receiving the funds, and the terms and expiration date of the contract that if executed will provide the funding, is not only required under the aforementioned statute and regulation, but 10 TAC §11.302 is clear that this information must exist prior to the Application Acceptance Date for REA to prepare its report. Because the Applicant did not provide evidence of project based vouchers or an operating subsidy for a minimum of 25% of all units, staff determined that the application does not meet the definition of Supportive Housing and the Target Population must be changed to either Elderly or general. The Development does not meet threshold requirements to be considered either, including 10 TAC §11.101(b)(6)(A) related to Unit Sizes.

Staff recommends the Board deny the appeal.

20114 3300 Caroline Termination Letter



TEXAS DEPARTMENT OF HOUSING AND COMMUNITY AFFAIRS

www.tdhca.state.tx.us

Greg Abbott
GOVERNOR

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April 6, 2020

Writer's direct dial: (512) 475-1676
Email: marni.holloway@tdhca.state.tx.us

Neal Drobenare
Magnificat Permanent Affordable, LLC
1090 Vermont Avenue NW, Ste. 400
Washington, D.C. Fort Worth, Texas 20005

RE: APPLICATION STATUS FOR 20114 - 3300 CAROLINE STREET

Dear Mr. Drobenare:

TDHCA sent you a deficiency notice on March 18, 2020, requesting you provide an explanation of how your application satisfied the requirements of 10 TAC §11.1(d)(122) related to the definition of Supportive Housing. In your response, you indicated that the letters from the Houston Housing Authority, one submitted with the Application and one with the deficiency response, provide sufficient evidence that the Development will be supported by project-based rental or operating subsidies for 25% of the Units.

The definition of Supportive Housing selected by the Applicant (10 TAC §11.1(d)(122)(E)(ii)) is new to the 2020 round, and contains the phrase "must also be supported by project-based rental or operating subsidies for a minimum of 25% of all Units . . ." It is staff's interpretation of this definition that applications utilizing this subsection's definition must demonstrate at full application a commitment of project-based rental assistance for 25% of the units from an external entity that is capable of committing project-based rental assistance for those units, or, alternatively, that such an external authority has committed its housing funding as an operating subsidy pledge to the development. Although you have indicated such an external entity in HHA, the timing of the RFA to commit the project-based rental assistance did not allow you to demonstrate at the time of full application that you have obtained the required project-based vouchers for a minimum of 25% of the units.

Since the Development does not meet the definition of Supportive Housing, the Target Population must be changed to either Elderly or general. The Development does not meet threshold requirements to be considered Elderly or general, and accordingly the Application is terminated, pending



your right to appeal. As this “with debt” option for defining Supportive Housing is a new rule, and this is the first opportunity for the Board to interpret its rule, it is the prudent course for staff to more strictly apply the definition and allow the Executive Director and Board to provide its input should you choose to appeal.

An appeal process exists for the Housing Tax Credit Program. The restrictions and requirements related to the filing of an appeal can be found in 10 TAC §11.902 of the 2020 QAP. Should you choose to appeal this decision to the Executive Director, you must file your appeal, in writing, with the Department not later than seven (7) calendar days after the date of this letter. If you are not satisfied with the decision of the Executive Director or if the Executive Director does not respond, you may file a further appeal with the Board of Directors of the Texas Department of Housing and Community Affairs. Please review §11.902 of the 2020 QAP for full instructions on the appeals process.

If you have any questions or concerns, please contact me at 512-475-1676 or by email at marni.holloway@tdhca.state.tx.us.

Sincerely,

**Marni
Holloway**

Digitally signed by
Marni Holloway
Date: 2020.04.06
11:15:17 -05'00'

Marni Holloway
Director, Multifamily Finance

Appeal Documents



600 Congress, Suite 2200
Austin, TX 78701
Telephone: 512-305-4700
Fax: 512-305-4800
www.lockelord.com

Cynthia L. Bast
Direct Telephone: 512-305-4707
Direct Fax: 512-391-4707
cbast@lockelord.com

April 13, 2020

Via Email

Mr. Bobby Wilkinson,
Executive Director
Texas Department of Housing and Community Affairs
221 East 11th Street
Austin, Texas 78701

Re: Appeal of Termination - 3300 Caroline Street
TDHCA No. 20114

Dear Bobby:

We represent Magnificat Permanent Affordable, LLC (the “**Applicant**”), which has applied for 2020 Housing Tax Credits¹ for the Development referenced above. The Development proposes 149 units of permanent Supportive Housing in Houston. The Applicant is co-sponsored by Magnificat Houses, Inc., a Houston-based non-profit that has been operating for over 50 years, and the NHP Foundation, a non-profit providing affordable housing and related services to over 25,000 residents across the country.

The Applicant has received a notice of termination based upon the following:

The definition of Supportive Housing selected by the Applicant (10 TAC §11.1(d)(122)(E)(ii)) is new to the 2020 round, and contains the phrase "must also be supported by project-based rental or operating subsidies for a minimum of 25% of all Units" It is staff's interpretation of this definition that applications utilizing this subsection's definition must demonstrate at full application a commitment of project-based rental assistance for 25% of the units from an external entity that is capable of committing project-based rental assistance for those units, or, alternatively, that such an external authority has committed its housing funding as an operating subsidy pledge to the development. Although you have indicated such an external entity in HHA, the timing of the RFA to commit the project-based rental assistance did not allow you to demonstrate at the time of full application that you have obtained the required project-based vouchers for a minimum of 25% of the units.

¹ Capitalized terms used but not defined in this letter shall have the meanings given them in the 2020 QAP.

TDHCA staff has acknowledged that, because the definition of Supportive Housing is new in the 2020 QAP, it has taken a conservative approach to interpretation. We respectfully request that you grant this appeal in your capacity as Executive Director and, if you choose not to grant the appeal, this matter be heard at the next available Board meeting.

Background Information

The 2020 QAP fundamentally changed the definition of Supportive Housing, placing more emphasis on the people to be served and the services to be provided, and less emphasis on the source of financing for the Development.² Whereas the definition in the 2019 QAP stated that the primary population served would be persons who are homeless or at risk of homelessness, the definition in the 2020 QAP specifically included seven additional categories of residents suitable for Supportive Housing, including persons with physical, intellectual, and/or development disabilities, youth aging out of foster care, and other people with high barriers to housing. Whereas the definition in the 2019 QAP required that supportive services be provided to the residents, the definition in the 2020 QAP included direction as to how those services would be provided, including specific requirements for an opportunity for resident feedback.

With this change in focus, the 2020 QAP allows a Supportive Housing Development to include foreclosable debt. Specifically, the definition of Supportive Housing includes a Development meeting the following criteria:

(ii) financed with debt that meets feasibility requirements under Subchapter D of this chapter without exemptions and must also be supported by project-based rental or operating subsidies for 25% of the Units, and meet all of the criteria in subclauses (I) - (VIII) of this clause:

(I) the Application includes documentation of how resident feedback has been incorporated into design of the proposed Development;

(II) the Development is located less than 1/2 mile from regularly-scheduled public transportation, including evenings and weekends;

(III) at least 10% of the Units in the proposed Development meet the 2010 ADA standards with the exceptions listed in "Nondiscrimination on the Basis of Disability in Federally Assisted Programs and Activities" 79 Federal Register 29671 for persons with mobility impairments;

(IV) multiple systems will be in place for residents to provide feedback to Development staff;

(V) a resident is or will be a member of the Development Owner or service provider board of directors;

² The 2019 QAP prohibited permanent foreclosable debt for a Supportive Housing Development, unless provided by federal funds or an Affiliate.

(VI) the Development's Tenant Selection Criteria will include a clear description of any credit, criminal conviction, or prior eviction history that may disqualify a potential resident. The disqualification cannot be a total prohibition, unless such a prohibition is required by federal statute or regulation (i.e. the Development must have an appeal process for non federally required criteria);

(VII) the Development will have a comprehensive written eviction prevention policy that includes an appeal process; and

(VIII) the Development will have a comprehensive written services plan that describes the available services, identifying whether they are provided directly or through referral linkages, by whom, and in what location and during what days and hours. A copy of the services plan will be readily accessible to residents.

10 TAC §11.1(d)(122)(E)(ii)

Prior to publication of the initial draft of the 2020 QAP, the Applicant met with the Houston Housing Authority to request 149 project-based vouchers for this Development. See the letter from the former Executive Director of the Housing Authority at Exhibit A. The Executive Director expressed a desire to support the Development and indicated the Housing Authority was still considering its 2020 Administrative Plan for the Section 8 program. The Housing Authority wanted to coordinate its award of project-based vouchers with TDHCA's 2020 QAP, to make sure the two programs would work together. Thus, it waited until the 2020 QAP was approved to prepare and publish a Request for Proposals ("RFP") to distribute 1000 project-based vouchers, with a priority for permanent supportive housing. Due to the Housing Authority's attempt to coordinate its program with the definition of Supportive Housing in the 2020 QAP, the RFP was not published prior to the Full Application Delivery Date. Thus, the Applicant submitted everything it could to indicate that project-based vouchers were expected for this Development. This included a letter from the Houston Housing Authority, attached as Exhibit B and various narratives including:

From Tab 17 Development Narrative:

While the project will be encumbered with must pay permanent debt, the property will have a long-term Section 8 Project Based Housing Assistance Payment contract through the Housing Authority for 100% of the units (see letter from the Housing Authority). Resident feedback has been obtained at the community meeting held on January 18, 2020 (see attached sign-in sheet). In addition, the site is located less than ½ mile from regularly scheduled public transportation (see attached map) and at least 10% of the units meet the 2010 ADA standards.

From Tab 31 Schedule of Sources:

The rents are based on the anticipated Section 8 HAP Project Based Contract to be entered into with the Housing Authority before Final Closing. Project Based Vouchers have been requested and in order to accommodate his an RFP is to be issued by HHA. We expect an award during underwriting and hopefully an AHAP prior to July TDHCA Board meeting. HHA has set aside PBV's for supportive housing which have not yet been allocated.

Once the Houston Housing Authority made its RFP available, the Applicant submitted its proposal, consistent with its prior correspondence with the Housing Authority. A copy of the proposal is attached as Exhibit D. The Housing Authority currently expects to include an agenda

item for approval of vouchers for this Development on its board agenda for April 21, 2020, which is the first time the board will consider an award of vouchers under the RFP.

Satisfaction of QAP

An Application is, by its very nature, prospective. The Applicant is proposing a Supportive Housing Development that will be “financed with debt” and “supported by project-based rental or operating subsidies.” The Applicant has submitted evidence of its debt financing by the presentation of a term sheet from a lender which, as we all know, is conditional and subject to change if Housing Tax Credits are awarded. The Applicant has also submitted evidence of its intent for support by project-based rental subsidy, which can be proven up at an appropriate time, such as concurrently with the receipt of a Commitment.

It should be further noted that §11.1(d)(122)(E)(ii) includes various other criteria that are prospective, including:

- (IV) multiple systems *will be in place* for residents to provide feedback . . .
- (V) a resident is *or will be* a member . . .
- (VI) the Development’s Tenant Selection Criteria *will include* . . .
- (VII) the Development *will have* a comprehensive written eviction prevention policy . . .
- (VIII) the Development *will have* a comprehensive written services plan . . .

(emphasis added)

It is reasonable to interpret the requirement that a Supportive Housing Development be “supported by project-based rental or operating subsidies” as a prospective requirement, for which evidence can be provided at the time of Application but proven at the time of Commitment.

As noted in a recent letter from the Houston Housing Authority attached as Exhibit C, the Housing Authority fully intended to make project-based vouchers available to applicants in the 2020 9% Housing Tax Credit application cycle. Given that it was impossible for the Applicant to submit its proposal for the project-based vouchers prior to the Full Application Delivery Date, we believe the Department should conclude that the materials submitted with the Application, and those included with this Administrative Deficiency response, are sufficient to satisfy Section 11.204(8) of the QAP, which addresses threshold requirements for project-based vouchers and says:

(F) Rental Assistance/Subsidy. (§2306.6705(4)) If rental assistance, an operating subsidy, an annuity, or an interest rate reduction payment is proposed to exist or continue for the Development, any related contract or other agreement securing those funds or proof of application for such funds must be provided. Such documentation shall, at a minimum, identify the source and annual amount of the funds, the number of units receiving the funds, and the term and expiration date of the contract or other agreement.

The definition of Supportive Housing in the QAP should be interpreted consistently with the threshold provision above. The Application and the letter from the Housing Authority attached as Exhibit B indicate that the Applicant had requested project-based vouchers from the Houston Housing Authority, even before the RFP was available, and prior to the Full Application Delivery Date. The documentation identified the source and annual amount of funds, the number of Units receiving funds, and the proposed term of the HAP Contract. Final award of the project-based vouchers can be proven up as a condition to a Commitment, just like all other sources of financing are eventually proven up through the process. To require otherwise would contravene the spirit and intent of the 2020 changes to the definition of Supportive Housing – to encourage quality Supportive Housing by defining it based upon the residents to be served and the services to be provided, and allowing more financing options.

This Application is a high priority for the City of Houston, as evidenced by documentation found at Exhibit E. The Applicant expects to receive the vouchers on April 21. It would be a shame for a conservative interpretation of this definition to upend this Application, particularly when the evidence included in the Application can be considered sufficient and consistent with the QAP.

For all these reasons, we believe the Applicant has met the requirement that “the Development must be supported by project-based rental or operating subsidies for 25% of the Units.” The Application for this Development should be reinstated. If additional information is required, please feel free to contact us.

Sincerely,



Cynthia L. Bast

cc: NHP Foundation

- Exhibit A -- Letter from former Executive Director of Houston Housing Authority
- Exhibit B -- Letter from Houston Housing Authority Included in Original Application
- Exhibit C -- Supplemental Letter from Houston Housing Authority
- Exhibit D -- Proposal in Response to RFP
- Exhibit E -- Support Documentation

Exhibit A

PHActory Consulting

14511 Broadgreen Drive
Houston, Texas 77079
tgunsolley@phactoryconsulting.com
(713) 260-0501

Sharon D. Gamble MSW, PMP
Competitive (9%) Housing Tax Credit Program Administrator
Texas Department of Housing and Community Affairs
221 East 11th Street, Austin, Texas 78701-2410

Dear Ms. Gamble,

I was HHA CEO up until January of this year. I met with the NHP Foundation in August of 2019 where they requested 150 vouchers for the Magnificat Supportive Housing development. I subsequently toured the site in September. I suggested to them that they put off making a written request because I expected the HHA's 2020 Section 8 Annual Action Plan to include a provision that would allow us to allocate Project Based Vouchers non competitively if HHA was a part of the ownership of the partnership, and we wanted to so participate. We did not expect to issue a PBV RFP until TDHCA finalized its QAP. The Board of Commissioners chose not to include this sole sourcing provision for HHA to participate in ownership, when the Action Plan came into effect on January 1. Thus, with this direction to competitively procure the PBV recipients, HHA set out to seek eligible projects, particularly supportive housing projects, but timing did not allow commitment of the PBVs by TDHCA's application deadline.

Sincerely,

Tory Gunsolley
President

Exhibit B



HOUSTON
HOUSING AUTHORITY

Transforming Lives & Communities

2640 Fountain View Drive ■ Houston, Texas 77057 ■ 713.260.0500 P ■ 713.260.0547 TTY ■ www.housingforhouston.com

February 26, 2020

Mr. Neal Drobenare
The NHP Foundation
122 East 42nd Street, Suite 4900
New York, NY 10168

Magnificat Houses, Inc.
3209 Austin Street
Houston, TX 77004

Re: 3300 Caroline

Dear Mr. Drobenare:

The Houston Housing Authority (HHA) is supportive of NHP and Magnificat House's dedication to providing Permanent Supportive Housing (PSH) for deeply vulnerable individuals. HHA has been a leader in a broad coalition working to end homelessness in Houston and Harris County and our commitment to this project is consistent with those efforts. Eight (8) years ago, HHA committed to putting 1000 units of Project Based Vouchers (PBV) into PSH projects. To date, we are approaching our goal and strongly support the creation of these additional units.

NHP has requested HHA's support to attach PBVs to all 149 of the planned units in the Magnificat / 3300 Caroline Street development for twenty years. HHA plans to issue a Request for Proposals (RFP) for PBV developments within the next 60 days which will prioritize the selection of PSH developments. The RFP will allow HHA to accept and evaluate proposals on a rolling basis. Proposals that score well under the RFP criteria will be recommended to the HHA Board for PBV awards, a process that generally takes approximately 90 days from HHA's receipt of the proposal. Following HHA Board approval, the execution of an Agreement to Enter into a PBV Housing Assistance Payments Contract (AHAP) is subject to HUD's processing requirements.

For informational purposes, the payment standard for the zip code that 3300 Caroline Street is located in has been assigned a payment standard of 93% of the HUD Fair Market Rent (FMR). 93% of FMR for an efficiency unit in 2020 equals \$770 per month.

HHA encourages NHP and Magnificat House to submit a PSH proposal under the forthcoming RFP for PBV developments. HHA appreciates your commitment to affordable housing and, in collaboration with the Way Home Houston and this partnership, looks forward to our collaborative efforts to provide decent, safe and sanitary homes to homeless individuals.

Regards,

Mark Thiele
Interim President & CEO

Exhibit C



HOUSTON
HOUSING AUTHORITY

Transforming Lives & Communities

2640 Fountain View Drive



Houston, Texas 77057



713.260.0500 P



713.260.0547 TTY



www.housingforhouston.com

3/24/2020

Mr. Bobby Wilkinson
Executive Director
Texas Department of Housing and Community Affairs
221 East 11th Street
Austin, Texas 78701

Re: Program Coordination

Dear Mr. Wilkinson:

The Houston Housing Authority strives to be a good partner with the Texas Department of Housing and Community Affairs in the administration of the low-income housing tax credit program. Our two agencies share a goal to prioritize supportive housing in our programs, so that we may increase our capacity to serve extremely-low and very-low income residents. When TDHCA proposed changes to its definition of Supportive Housing for the 2020 QAP, we took note and considered how we could implement our programs in a manner that would coordinate with TDHCA's priorities.

The Houston Housing Authority's 2020 Administrative Plan for the Housing Choice Voucher program allows the Housing Authority to issue a request for proposals (RFP) for owners and developers desiring to implement project based vouchers (PBV). In selecting PBV recipients, the Plan calls for the Housing Authority to consider:

- Extent to which the project supports HHA goals related to permanent supportive housing, youth aging out of foster care, reducing homelessness, support for City and/or other revitalization initiatives and/or other goals identified in the RFP; and
- Extent to which the project demonstrates an appropriate supportive services plan based on projected resident needs.

On March 4, 2020, the Housing Authority published an RFP for PBVs. In the RFP, we strongly encouraged proposals to include permanent supportive housing and supportive housing for transition age youth aging out of foster care. Our evaluation criteria are weighted to incentivize supportive housing for the chronically homeless. Specifically, the RFP has a maximum score of 120, with a score of 70 needed to win an allocation. Supportive housing projects can score up to 40 points for serving a homeless population and having a high quality supportive services plan. Projects in a high opportunity area can score an additional 20 points.

We have specifically identified up to 1,000 PBVs to be available for supportive housing developments through the RFP process. We anticipated this would allow the Housing Authority to provide subsidy for supportive housing developments proposed for the City of Houston in the 2020 low-income housing tax credit cycle, which meet PBV program requirements. The first in a series of RFPs, RFP 18-20 was posted on March 4, 2020, and was closed on March 18, 2020. A second, identical RFP, RFP 20-22, is now posted with a closing date of March 31, 2020. In response to RFP 18-20, we received 2 proposals requesting PBVs. HHA reviews and evaluates all proposals received in accordance with the RFP and PBV program requirements. Recommended projects are subject to approval by the HHA Board of Commissioners. Our decision on awarding PBVs is expected to be made in the next 60 days, well in advance of TDHCA's deadline to award low-income housing tax credits. This should allow TDHCA to confirm whether an applicant in Houston has received an award of PBVs, if such is needed to fulfill TDHCA's requirements for a supportive housing development.

If you have any questions about the Housing Authority's administration of its PBV program, please do not hesitate to contact me.

Sincerely,



Mark Thiele, CS-PHM, CME, CMVO, NCC
Interim President & CEO
Houston Housing Authority

Exhibit D

**Houston Housing Authority
RFP 20-18**

**Project: 3300 Caroline Street (Magnificat)
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Appendix A - Application for Project Based Voucher Assistance

Houston Housing Authority (HHA) requires that a separate proposal be submitted for each project for which Project Based Voucher (PBV) assistance is requested. A completed Application for Project Based Voucher Assistance must be included in each proposal. Proposers must follow these instructions:

- Proposal submission instructions are provided in part “4.0 Submittals” of HHA’s solicitation. As noted therein, in addition to a CD ROM or Flash Drive, one (1) original and one (1) copy of the proposal must be submitted by the specified due date. The hard copy materials must include a table of contents and be organized into three ring binders that are divided by labeled tabs to clearly note the contents of each section.
- There are nineteen (19) numbered sections of the Application for PBV Assistance. Proposers must respond to all sections except:
 - ✓ Section 11 – Applies only to Existing and Substantial Rehabilitation Projects
 - ✓ Section 12 – Applies only to New Construction Projects
 - ✓ Section 18 – Applies only to New Construction and Substantial Rehabilitation Projects
- Use the fillable fields in the application form to provide information wherever possible. If additional information is required, include it in the proposal submission in a separate, labeled tab. For example, Section 5 of the application form requires submission of a Tenant Selection Plan and Lease. This information should be included in a tab labeled “Section 5 Tenant Selection Plan and Lease”.

Houston Housing Authority - Application for Project Based Voucher Assistance

1. Owner Information

Date of Submission: 3/18/20

Owner Name: NHP Foundation, Inc.

Corporate Status (e.g.501(c)3, Corporation, LP, LLC, Sole Proprietor, Other): 501(c)(3)

Address: 122 E. 42nd Street, Suite 4900, New York, NY 10168

Contact Person: Neal Drobenare

Phone Number: 202-316-7351

Email Address: ndrobenare@nhpfoundation.org

2. General Project Information

Proposed PBV Project Name: 3300 Caroline Street

Total Units Proposed for PBV Assistance: 149 # **Currently Occupied:** 0

Legal Name of Project Owner: Magnificat Permanent Affordable, LLC

Proposed PBV Project Address: 3300 Carline Street

Management Company/Agent for Proposed PBV Project: Allied-Orion

Project Type (Existing, New Construction or Rehabilitation): New Construction

Number of Buildings in Project: 149 **Total Acreage of Project Site:** 1.148

Number of Units in Project that are Single Family Homes: 0

3. Summary of Project Units

Complete the bedroom distribution chart below for the overall project and for the requested PBV contract units.

	OBR	IBR	2BR	3BR	4BR	5BR	Total
All Units in Project	149						149
Total Proposed PBV Contract Units	149						149
# of Proposed PBV Units that are ADA handicapped accessible	12						12
# of Proposed PBV Units that are equipped for sensory impaired	5						5

4. Resident Population

Who is the intended target population for the proposed PBV units? Check All That Apply:

- Single Persons Families with children Elderly (over 62 years) Disabled
- "Qualifying" family or person requiring participation in a program of supportive services
- Homeless At risk of homelessness
- Transition Age Youth Aging Out of Foster Care (TAY)
- Other (please define) _____

5. Tenant Selection Plan and Lease

Attach a copy of the proposed tenant selection plan to occupy PBV units and the lease to be entered into between owner and tenant. Note that HHA will utilize its PBV wait list to refer applicants to project owners. HHA will determine eligibility and occupancy standards for the program, and then refer eligible applicants to the owner for screening. The lease must include the required PBV Tenancy Addendum, the provisions of which shall take precedence over any other lease terms. The tenant selection plan must include a statement that applicants for the PBV units will be selected in accordance with all applicable HUD requirements and regulations. If participation in a supportive services program is required, incorporate detailed information on the requirements and how the program will be monitored. At a minimum, the plan must address the following:

- Screening policies and criteria to be used. If credit checks are used, describe acceptability criteria. Screening for credit and other factors must be consistent with the screening criteria used for non-assisted tenants
- Security deposit policies
- Procedures for accepting applications and selecting from the waiting list
- Unit transfer policies
- Compliance with Section 504 of the Rehabilitation Act of 1973, Fair Housing Act and relevant civil rights laws & statutes

6. Requested Contract Term

The initial HAP contract term can be for a maximum term of 15 years. Indicate the length of initial HAP contract term requested by owner: 15 Years

7. Other Project Based Assistance

Are the proposed PBV units assisted through the Low Income Housing Tax Credit program? Yes
 No

Do any units within the proposed PBV project have another form of rental or other government assistance*?
 Yes No

**Refer to 24 CFR 983.54 for further information.*

If Yes, describe type of assistance and units that are impacted. _____

8. Affordability Restrictions

Is there a housing affordability restriction in the deed or other document? Yes No

If Yes, describe the housing program requiring the restriction and the date of expiration. 9% LIHTC 30 Year extended use

If Yes, describe type of assistance and units that are impacted. Capital Funds/All impacted-restricted

9. Amenities

Unit Amenities

Check off any amenities that will be provided. Add others below if not included on this list.

- Features adapted/adaptable for persons with disabilities
- Air conditioning
- Off street parking
- Laundry facilities
- Porches, decks, personal backyard
- Children's play areas
- Recreational facilities
- Common area function room(s)
- Other _____

Community Amenities

Distance To:	Less than .5 Mile	Approx. 1 Mile	More Than 1 Mile
Shopping, groceries, pharmacy, other everyday type of needs	X		
Employment Opportunities (i.e. organizations with 25 or more employees)	X		
Public Transportation	X		
Medical facilities	X		
Public Schools	X		
Parks, civic facilities	X		

10. Deconcentration of Poverty, Expanding Housing and Economic Opportunities and City-Designated Revitalization Area

Census Tract of Proposed PBV Project: 48201312500 **Poverty Rate*:** 14

*Census tracts and poverty rates can be found by entering complete address and zip code at the following website: <http://factfinder2.census.gov/faces/nav/jsf/pages/index.xhtml>

Elementary School Zone: Gregory Lincoln Ed Station Center **Met Standard Rating for Index 1 Student Achievement:** D
Middle School Zone: Gregory Lincoln Ed Station Center **Met Standard Rating for Index 1 Student Achievement:** D
High School School Zone: Lamar **Met Standard Rating for Index 1 Student Achievement:** B

Is the proposed project located in a census tract designated by the City of Houston as a revitalization area? yes

Applicants for PBV assistance must demonstrate that the proposed PBV project is consistent with HUD's statutory goal of "deconcentrating poverty and expanding housing and economic opportunities", regardless of the project's poverty rate as defined by the most recent census data. Provide a detailed, separate response to each of the criteria listed below. If necessary, attach additional documentation. Note that HHA will utilize responses to this section to assign scores for the "High Opportunity and City-Designated Revitalization Area" evaluation criteria.

HUD Designated Zone - Whether the census tract in which the proposed project will be located is in a HUD-designated Enterprise Zone, Economic Community, or Renewal Community.

No

Public Housing Demolition - Whether a PBV development will be located in a census tract where the concentration of assisted units will be or has decreased as a result of public housing demolition.

No

Significant Revitalization - Whether the census tract in which the proposed PBV development will be located is undergoing significant revitalization.

yes

Public Investment - Whether state, local, or federal dollars have been invested in the area that has assisted in the achievement of the statutory requirement.

yes

New Market Rate Units - Whether new market-rate units are being developed in the same census tract where the proposed PBV development will be located and the likelihood that such market-rate units will positively impact the poverty rate in the area.

yes

Decline in Poverty Rate - If the poverty rate in the area where the proposed PBV development will be located is greater than 20 percent, the PHA should consider whether in the past five years there has been an overall decline in the poverty rate.

N/A

Education and Economic Opportunities - Whether there are meaningful opportunities for educational and economic advancements in the census tract where the proposed PBV development will be located.

yes

11. Site and Neighborhood Standards: Existing and Rehabilitated Housing Projects

Only proposals for PBV assistance in Existing or Rehabilitated projects must complete this section. Applicants must provide a brief narrative indicating how the proposed project conforms to the required site and neighborhood standards for these housing types. For each of the four criteria listed below, provide a detailed narrative. Attach any additional materials as needed. Note that HHA will utilize responses to this section to assign scores for the “High Opportunity and City-Designated Revitalization Area” evaluation criteria.

(1) The site must be adequate in size, exposure and contour to accommodate the number and type of units proposed, and is there adequate utilities and available streets to service the site.

N/A

(2) The site must promote greater choice of housing opportunities and avoid undue concentration of assisted persons in areas containing a high proportion of low-income persons.

N/A

(3) The site must be accessible to social, recreational, educational, commercial and health facilities and services and other municipal facilities and services that are at least equivalent to those typically found in neighborhoods consisting largely of unassisted, standard housing of similar market rents; and,

N/A

(4) The site must be located such that travel time and cost via public transportation or private automobile from the neighborhood to places of employment providing a range of jobs for lower income workers is not excessive.

N/A

12. Site and Neighborhood Standards: New Construction Projects

Only proposals for PBV assistance in New Construction projects must complete this section. Applicants must provide a brief narrative indicating how the proposed project conforms to the required site and neighborhood standards for these housing types. For each of the seven criteria listed below, provide a detailed narrative. Attach any additional materials as needed. Note that HHA will utilize responses to this section to assign scores for the “High Opportunity and City-Designated Revitalization Area” evaluation criteria.

(1) The site must be adequate in size, exposure, and contour to accommodate the number and type of units proposed, and adequate utilities (water, sewer, gas, and electricity) and streets must be available to service the site;

See attachment 12 A

(2) The site must not be located in an area of minority concentration, except as permitted under paragraph (3) below, and must not be located in a racially mixed area if the project will cause a significant increase in the proportion of minority to non-minority residents in the area. See attachment 12B

(3) A project may be located in an area of minority concentration only if:

(i) Sufficient, comparable opportunities exist for housing for minority families in the income range to be served by the proposed project outside areas of minority concentration; or

(ii) The project is necessary to meet overriding housing needs that cannot be met in that housing market area.

(iii) As used in paragraph 3)(i) above, “sufficient” does not require that there be an equal number of assisted units within and outside of areas of minority concentration. Rather, application of this standard should produce a reasonable distribution of assisted units each year that, over a period of several years, will approach an appropriate balance of housing choices within and outside areas of minority concentration. An appropriate balance must be determined in light of local conditions affecting the range of housing choices available for low-income minority families and in relation to the racial mix of the City’s population.

(iv) Units may be considered “comparable opportunities,” as used in paragraph 3)(i) above, if they have the same household type (elderly, disabled, family, large family) and tenure type (owner/renter); require approximately the same tenant contribution towards rent; serve the same income group; are located in the same housing market; and are in standard condition.

(v) Application of this sufficient, comparable opportunities standard involves assessing the overall impact of HUD-assisted housing on the availability of housing choices for low-income minority families in and outside areas of minority concentration, and must take into account the extent to which the following factors are present, along with other factors relevant to housing choice:

(A) A significant number of assisted housing units are available outside areas of minority concentration.

(B) There is significant integration of assisted housing projects constructed or rehabilitated in the past 10 years, relative to the racial mix of the eligible population.

(C) There are racially integrated neighborhoods in the locality.

(D) Programs are operated by the locality to assist minority families that wish to find housing outside areas of minority concentration.

(E) Minority families have benefited from local activities (*e.g.* , acquisition and write-down of sites, tax relief programs for homeowners, acquisitions of units for use as assisted housing units) undertaken to expand choice for minority families outside of areas of minority concentration.

(F) A significant proportion of minority households has been successful in finding units in non-minority areas under the tenant-based assistance programs.

(G) Comparable housing opportunities have been made available outside areas of minority concentration through other programs.

(vi) Application of the “overriding housing needs” criterion, for example, permits approval of sites that are an integral part of an overall local strategy for the preservation or restoration of the immediate neighborhood and of sites in a neighborhood experiencing significant private investment that is demonstrably improving the economic character of the area (a “revitalizing area”). An “overriding housing need,” however, may not serve as the basis for determining that a site is acceptable, if the only reason the need cannot otherwise be feasibly met is that discrimination on the basis of race, color, religion, sex, national origin, age, familial status, or disability renders sites outside areas of minority concentration unavailable or if the use of this standard in recent years has had the effect of circumventing the obligation to provide housing choice.

(4) The site must promote greater choice of housing opportunities and avoid undue concentration of assisted persons in areas containing a high proportion of low-income persons.

See attachment 12 C

(5) The neighborhood must not be one that is seriously detrimental to family life or in which substandard dwellings or other undesirable conditions predominate, unless there is actively in progress a concerted program to remedy the undesirable conditions.

See attachment 12 D

(6) The housing must be accessible to social, recreational, educational, commercial, and health facilities and services and other municipal facilities and services that are at least equivalent to those typically found in neighborhoods consisting largely of unassisted, standard housing of similar market rents.

See attachment 12 E

(7) Except for new construction housing designed for elderly persons, travel time, and cost via public transportation or private automobile from the neighborhood to places of employment providing a range of jobs for lower-income workers, must not be excessive.

See attachment 12 F

14. Experience Owning Rental Housing (check if any apply):

- a. 10 years or more of experience owning affordable rental housing
 1-9 years of experience owning affordable rental housing
 10 years or more of experience owning other rental housing
 1 to 9 years of experience owning other rental housing
 - b. Describe below your experience, including the number of years of experience in owning rental housing, the amount of that time devoted to affordable rental housing, if applicable; the number of units (specify separately number of affordable and other rental units); if the portfolio includes subsidized properties, the address(es) and funding source(s), and if assistance has ever been terminated. If assistance has been terminated, please identify the program(s) and state why. Attach any additional materials as needed.
-

15. Experience Managing and Maintaining Rental Housing (check if any apply):

- a. 10 years or more of experience managing and maintaining affordable rental housing
 1 to 9 years of experience managing and maintaining affordable rental housing
 10 years or more of experience managing and maintaining other rental housing
 1 to 9 years of experience managing and maintaining other rental housing
 - b. Describe below owner's experience as a property manager or the experience of owner's designated property manager, including the number of years of experience in managing and maintaining rental housing, number and type of units under management, the amount of that time devoted to affordable rental housing. Attach any additional materials as needed.
-

16. Public Purpose (check if any apply):

- 75% or more units in building would be restricted to low- or very-low income occupancy
- 50% to 74% of units in building would be restricted to low- or very-low income occupancy
- Units meet other City-identified priority needs such as supportive housing

Identify below what other City-identified priority would be met through the project-basing of units. Attach any additional materials as needed.

17. Applicant’s Plans for Management and Maintenance of Units:

- a. Is there a written plan for management and maintenance of the proposed PBV units?
 Yes No

If "Yes," please include the management and maintenance plan as an attachment to this application. If "No," please provide a description of how units will be managed and maintained, both on an on-going and long-term basis, focusing on property management, preventive maintenance, routine maintenance, emergency repairs, security, and health and safety-related areas. Describe the personnel/positions to be assigned to management and maintenance of the proposed project, hours of operation, location of management/maintenance offices and other pertinent information.

- b. If applicable, describe any supportive services that will be provided to tenants. Complete the chart below and include as an attachment letters of commitment from service providers.

POPULATION	TYPE OF SERVICE	SERVICE PROVIDER
Chronic Homeless	Resident Service Coordnation	Magnificat Houses, Inc.

18. Additional Information for New Construction and Substantial Rehabilitation Projects

This section applies only to proposed new construction or substantial rehabilitation projects.

- a. Construction Schedule:** Complete the following schedule.

Finance Closing	<u>November 2020</u>
Construction Start Date	<u>November 2020</u>
Construction Completion Date	<u>May 2022</u>
Occupancy Date	<u>May 2022</u>

- b. Zoning and Other Approvals:** Have all zoning and other required approvals including historic and environmental review as appropriate been received? **Yes** **No**

If **No**, provide a description of current status of required approvals including an estimate of when all required approvals will be secured . _____

- c. Site Control:** Does Owner have site control over the proposed site? **Yes** **No**

Provide a brief description of the nature of the owner’s site control. Attach documentation where needed, i.e. a copy of site control contract, etc. _____

d. Include the following attachments with the application:

- Description of project work plans such as site/unit plans and elevations
- Statement of Sources and Uses for Funds to develop the project
- Operating pro forma
- Documentation regarding compliance with Davis – Bacon Wage rates if nine (9) or more units are proposed for project based assistance.

19. Certifications

Provide the required information on a separate sheet of paper and attach to this application:

1. The identity of the owner and other project principals and the names of officers and principal members, shareholders, investors, and other parties having a substantial interest in the project;
2. A certification stating that the above-mentioned parties are not on the U.S. General Services Administration list of parties excluded from Federal procurement and non-procurement programs;
3. A disclosure of any possible conflict of interest by any of these parties that would be a violation of the PBV Housing Assistance Payments (HAP) contract.

I, Neal Drobenare, attest and certify that all of the information herein contained is true and accurate to the best of my knowledge. I understand that by submitting this application for project-based assistance application there is no commitment from the Houston Housing Authority that my proposal will be accepted. I understand that in-place existing tenants must be certified as eligible to receive project-based assistance, and if they are not eligible, I may not displace them in order to qualify their unit for PBV. I understand and agree to abide by all applicable federal Section 8 requirements found at 24 CFR Part 983 and HHA's PBV requirements found in its Administrative Plan.

Signature of Owner

Title

Date

Exhibit E



CITY OF HOUSTON

Housing & Community Development Department

Sylvester Turner

Mayor

Tom McCasland
Director
2100 Travis, 9th Floor
Houston, Texas 77002

T. (832) 394-6200
F. (832) 395-9662
www.houstontx.gov/housing

April 13, 2020

Mr. Bobby Wilkinson,
Executive Director
Texas Department of Housing and Community Affairs
221 East 11th Street
Austin, Texas 78701

Re: TDHCA No. 20114; 3300 Caroline Street

Dear Mr. Wilkinson:

Magnificat Permanent Affordable, LLC (Applicant) submitted an application to the Texas Department of Housing and Community Affairs (TDHCA) for 9% housing tax credits to facilitate the construction of a permanent supportive housing development to be located at 3300 Caroline Street, Houston, Texas 77004 (Development Site). The proposed development will be a 149-unit supportive housing development within the Midtown area of Houston. This area and the development site is undergoing gentrification as it is well situated along major commercial and transit corridors of Houston.

Please let this letter serve to recognize that the City of Houston supports the development of 3300 Caroline Street as evidenced by a resolution of support issued to the Applicant. Additionally, 3300 Caroline Street is a proposed permanent supportive housing development which are prioritized within its selection criteria for support resolutions. The City partners with several agencies including the Coalition for the Homeless, Harris County and other partners to supplement the deficiency of the supportive housing needed to care for the growing population of homeless within the City. Development proposals like 3300 Caroline Street will assist the City and its partners to effectively prevent and end homelessness.

We hope that you will take these findings into consideration in the review of the application for 3300 Caroline Street.

Sincerely,

A handwritten signature in black ink, appearing to read "Ray S. Miller".

Ray S. Miller
Assistant Director

TDHCA Response



TEXAS DEPARTMENT OF HOUSING AND COMMUNITY AFFAIRS

www.tdhca.state.tx.us

Greg Abbott
GOVERNOR

BOARD MEMBERS
Leslie Bingham, *Vice Chair*
Paul A. Braden, Member
Sharon Thomason, Member
Leo Vasquez, Member

April 27, 2020

Writer's direct dial: (512) 475-3296
Email: bobby.wilkinson@tdhca.state.tx.us

Cynthia L. Bast
Locke Lord, LLP
600 Congress, Ste. 2200
Austin, Texas 78701

RE: APPEAL RESPONSE FOR 20114 3300 CAROLINE STREET

Dear Ms. Bast:

The Texas Department of Housing and Community Affairs received your appeal dated April 13, 2020, regarding the termination of the Application named above. Staff found that the Application does not meet the definition of Supportive Housing because the Applicant did not provide sufficient evidence that the Development will be supported by project-based rental or operating subsidies for 25% of the Units, and the Target Population must be changed to either Elderly or general. Since the Application does not meet threshold requirements to be considered Elderly or general, it was terminated, pending the Applicant's right to appeal.

Your appeal focuses on the prospective nature of the wording of some criteria in 10 TAC §11.1(d)(122)(E)(ii), and notes that the Application included a letter from the Houston Housing Authority (HHA) supporting the idea that the proposed development submit a proposal for project based vouchers in a forthcoming Request For Proposal (RFP). As additional information with the appeal, HHA submitted a letter explaining the RFP process, and materials indicating that 3300 Caroline has now submitted an application seeking project based vouchers for all 149 units. Finally, the appellant claims to have satisfied 10 TAC §11.204(8) regarding threshold requirements for project-based vouchers by including with the application documentation that "identif[ies] the source and annual amount of the funds, the number of units receiving the funds, and the term and expiration date of the contract or other agreement." This is all in support of the argument that the Applicant submitted their request to HHA to obtain project based vouchers for a minimum of 25% of all units as soon as the Housing Authority made them available, and that these vouchers should be awarded, or not, by Commitment.



10 TAC §11.204(8)(F) notes that if a rental assistance is proposed to exist for the Development, “any related contract or other agreement securing those funds or proof of application for such funds must be provided.” While it may be that “the Applicant submitted everything it could [with the Application] to indicate that project based vouchers were expected for this Development,” as stated in the appeal, the timing of the RFP precluded submission of a contract or even the application for the RFP. Moreover, the wording of the (E)(ii) definition requires that the proposed development “must also be supported” by these vouchers.

Additionally, Section 2306.6705(4) of the Tex. Gov’t Code requires that the Applicant identify in the application three items: (A) the source and annual amount of the funds; (B) the number of units receiving the funds; and (C) the term and expiration date of the contract or other agreement. Because the RFP describing the available funding and terms for the project-based vouchers did not exist prior to the Application Delivery Date, the Application’s description of the first two items are speculative, and the term and expiration date of the contract is not clear. Knowing the sources of project-based rental assistance, the annual amount of the funds, the number of units receiving the funds, and the terms and expiration date of the contract that, if executed, would provide the funding is essential information not only under the aforementioned statute and rule, but 10 TAC §11.302 is clear that the information needed to exist prior to the Application Acceptance Date for REA to prepare its report.

I do not find that Staff was incorrect in concluding the (E)(ii) phrase “be supported” indicates a requirement of the Application that these project-based vouchers have already be awarded, or that the “proof of application for such funds” language in 10 TAC §11.204(8)(F) was not satisfied by proof of intent to apply for such funds when the RFP application opened after the Application deadline. Accordingly, I am denying the appeal.

If you are not satisfied with this decision, you may file a further appeal with the Board of Directors of the Texas Department of Housing and Community Affairs. Please review 10 TAC §11.902 for the appeal process. If you have any questions or require further information, please contact Marni Holloway, Multifamily Finance Director, at marni.holloway@tdhca.state.tx.us.

Sincerely,



Bobby Wilkinson
Executive Director

Board Appeal Documents



600 Congress Avenue, Suite 2200
Austin, Texas 78701
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Cynthia L. Bast
Direct Telephone: 512-305-4707
Direct Fax: 512-391-4707
clbast@lockelord.com

May 4, 2020

Via Email

Mr. Bobby Wilkinson,
Executive Director
Texas Department of Housing and Community Affairs
221 East 11th Street
Austin, Texas 78701

Re: Appeal of Termination - 3300 Caroline Street
TDHCA No. 20114

Dear Bobby:

We represent Magnificat Permanent Affordable, LLC (the “**Applicant**”), which has applied for 2020 Housing Tax Credits¹ for the Development referenced above. The Development proposes 149 units of permanent Supportive Housing in Houston. The Applicant is co-sponsored by Magnificat Houses, Inc., a Houston-based non-profit that has been operating for over 50 years, and the NHP Foundation, a non-profit providing affordable housing and related services to over 25,000 residents across the country.

On April 13, 2020, we submitted an appeal for the termination of the Application, attached as Exhibit A. You have denied the appeal, and our client wishes to appeal to the Board at the next available meeting. We hope the Board will carefully consider our arguments in the attached appeal, along with the following:

- The Houston Housing Authority has taken action to award the Development project-based vouchers for a term up to 20 years, as evidenced by the resolutions attached as Exhibit B, which were approved at a public meeting.
- Every element of the financial structure of every Application is speculative.
- TDHCA can impose conditions upon an award that require delivery of additional evidence at the time of Commitment or other subsequent deadlines.

¹ Capitalized terms used but not defined in this letter shall have the meanings given them in the 2020 QAP.

- If the Board interprets the QAP in a manner that would not result in the approval of this appeal, a waiver of the rule(s) could allow this Application to proceed.

Response to Executive Director's Denial

As noted in the Executive Director's denial for this appeal, this Application must meet the definition of Supportive Housing in §11.1(d)(122)(E)(ii), which states the Development must "be supported by project-based rental or operating subsidies for all Units." In addition, any Application that includes rental assistance must meet the threshold requirement in §11.204(8)(F), which states "any related contract or other agreement securing those funds or proof of application for such funds must be provided." The Applicant must also "identify the source and annual amount of the funds, the number of units receiving the funds, and the term and expiration date of the contract or other agreement." The threshold requirement stems from §2306.6705(4) of the Texas Government Code. Each of these requirements is addressed below:

- "identify the source and annual amount of the funds, the number of units receiving the funds, and the term and expiration date of the contract or other agreement"

The Applicant clearly identified that the source of the project-based vouchers would be the Houston Housing Authority, by including a letter from the Housing Authority in the Application. The Housing Authority's letter acknowledged that the Applicant was seeking subsidy for 149 Units, and that the current rental rate for a subsidized Efficiency Unit in 2020 is \$770. The Applicant used this rate in its Rent Schedule presentation and in its Operating Pro Forma for the entirety of the Compliance Period.

HUD regulations establish the procedure for a housing authority to award project-based vouchers. With regard to an expiration date or term for the rental subsidy contract, such date is not established until the owner and housing authority enter into the HAP Contract, which cannot be executed until construction of the Development is complete. Prior to the HAP Contract, the owner and housing authority enter into an AHAP Contract, which cannot be executed until the subsidy layering and environmental reviews are complete. The HUD form of AHAP Contract does not refer to the term of the proposed HAP Contract. However, pursuant to 24 CFR §983.205, the initial term of a HAP Contract can be up to 15 years, and it can be extended in additional periods up to 15 years. Per conversations with the Houston Housing Authority, the Applicant understood the Housing Authority intended for the HAP Contract to extend through the compliance period, which is why it utilized the project-based voucher rental rates for its 15-year Operating Pro Forma.

- "any related contract or other agreement securing those funds or proof of application for such funds must be provided"

As explained in the attached appeal and above, HUD regulations prohibit the execution of an AHAP Contract or a HAP Contract until certain conditions are met. Those conditions generally are not met prior to the submission of a Tax Credit Application. Therefore, no contract was available for submission at the time of Application. The QAP allows for this.

It requires the Applicant to submit “any” related contract or other agreement. The word “any” denotes an amount that is unspecified, which can be anything from none to multiple. The Applicant did not have a contract; since the rule requires submission of any contract an applicant does have, the Applicant did not fail to meet the threshold requirement.

- “be supported by project-based rental or operating subsidies for all Units”

In our prior appeal, we discussed the fact that the financial structuring in a Tax Credit Application is speculative. An investor provides a letter of intent with terms that are consistent with market conditions and the limited information available on the day the letter is issued. The same goes for the lender(s). These letters of intent give TDHCA parameters by which to underwrite the Application, but the terms always change before closing. TDHCA addresses those changes at various checkpoints following the award. If an Applicant fails to deliver an anticipated source of funds, or the sources change materially, TDHCA reserves the right to re-underwrite or even revoke Tax Credits, per the Commitment. There is no reason why the rental subsidy should be treated differently than other parts of the financing plan. If all elements of the financing plan are treated similarly, then the phrase “supported by” can refer to the Applicant’s expectation at the time of Application submission. This gives TDHCA sufficient information to conduct its underwriting review. If the Applicant fails to deliver the project-based vouchers after award, TDHCA can re-underwrite to assure continued financial feasibility and, if necessary, revoke the Commitment.

As discussed in our prior appeal, the definition of Supportive Housing was substantially revised in the 2020 QAP, with an intent to allow more of these Developments to access the Tax Credit program. The interpretation of the rules made by the staff veers off this intended path. We ask the Board to impose an interpretation that harmonizes the rules, the intent, the surrounding circumstances, and the elements that are within and without the Applicant’s control. With that, the Board can reinstate this Application.

Sincerely,



Cynthia L. Bast

cc: NHP Foundation

Exhibit A -- Appeal to Executive Director

Exhibit B -- Houston Housing Authority Resolutions Approving PBVs

EXHIBIT A
APPEAL TO EXECUTIVE DIRECTOR



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April 13, 2020

Via Email

Mr. Bobby Wilkinson,
Executive Director
Texas Department of Housing and Community Affairs
221 East 11th Street
Austin, Texas 78701

Re: Appeal of Termination - 3300 Caroline Street
TDHCA No. 20114

Dear Bobby:

We represent Magnificat Permanent Affordable, LLC (the “**Applicant**”), which has applied for 2020 Housing Tax Credits¹ for the Development referenced above. The Development proposes 149 units of permanent Supportive Housing in Houston. The Applicant is co-sponsored by Magnificat Houses, Inc., a Houston-based non-profit that has been operating for over 50 years, and the NHP Foundation, a non-profit providing affordable housing and related services to over 25,000 residents across the country.

The Applicant has received a notice of termination based upon the following:

The definition of Supportive Housing selected by the Applicant (10 TAC §11.1(d)(122)(E)(ii)) is new to the 2020 round, and contains the phrase "must also be supported by project-based rental or operating subsidies for a minimum of 25% of all Units" It is staff's interpretation of this definition that applications utilizing this subsection's definition must demonstrate at full application a commitment of project-based rental assistance for 25% of the units from an external entity that is capable of committing project-based rental assistance for those units, or, alternatively, that such an external authority has committed its housing funding as an operating subsidy pledge to the development. Although you have indicated such an external entity in HHA, the timing of the RFA to commit the project-based rental assistance did not allow you to demonstrate at the time of full application that you have obtained the required project-based vouchers for a minimum of 25% of the units.

¹ Capitalized terms used but not defined in this letter shall have the meanings given them in the 2020 QAP.

TDHCA staff has acknowledged that, because the definition of Supportive Housing is new in the 2020 QAP, it has taken a conservative approach to interpretation. We respectfully request that you grant this appeal in your capacity as Executive Director and, if you choose not to grant the appeal, this matter be heard at the next available Board meeting.

Background Information

The 2020 QAP fundamentally changed the definition of Supportive Housing, placing more emphasis on the people to be served and the services to be provided, and less emphasis on the source of financing for the Development.² Whereas the definition in the 2019 QAP stated that the primary population served would be persons who are homeless or at risk of homelessness, the definition in the 2020 QAP specifically included seven additional categories of residents suitable for Supportive Housing, including persons with physical, intellectual, and/or development disabilities, youth aging out of foster care, and other people with high barriers to housing. Whereas the definition in the 2019 QAP required that supportive services be provided to the residents, the definition in the 2020 QAP included direction as to how those services would be provided, including specific requirements for an opportunity for resident feedback.

With this change in focus, the 2020 QAP allows a Supportive Housing Development to include foreclosable debt. Specifically, the definition of Supportive Housing includes a Development meeting the following criteria:

(ii) financed with debt that meets feasibility requirements under Subchapter D of this chapter without exemptions and must also be supported by project-based rental or operating subsidies for 25% of the Units, and meet all of the criteria in subclauses (I) - (VIII) of this clause:

(I) the Application includes documentation of how resident feedback has been incorporated into design of the proposed Development;

(II) the Development is located less than 1/2 mile from regularly-scheduled public transportation, including evenings and weekends;

(III) at least 10% of the Units in the proposed Development meet the 2010 ADA standards with the exceptions listed in "Nondiscrimination on the Basis of Disability in Federally Assisted Programs and Activities" 79 Federal Register 29671 for persons with mobility impairments;

(IV) multiple systems will be in place for residents to provide feedback to Development staff;

(V) a resident is or will be a member of the Development Owner or service provider board of directors;

² The 2019 QAP prohibited permanent foreclosable debt for a Supportive Housing Development, unless provided by federal funds or an Affiliate.

(VI) the Development's Tenant Selection Criteria will include a clear description of any credit, criminal conviction, or prior eviction history that may disqualify a potential resident. The disqualification cannot be a total prohibition, unless such a prohibition is required by federal statute or regulation (i.e. the Development must have an appeal process for non federally required criteria);

(VII) the Development will have a comprehensive written eviction prevention policy that includes an appeal process; and

(VIII) the Development will have a comprehensive written services plan that describes the available services, identifying whether they are provided directly or through referral linkages, by whom, and in what location and during what days and hours. A copy of the services plan will be readily accessible to residents.

10 TAC §11.1(d)(122)(E)(ii)

Prior to publication of the initial draft of the 2020 QAP, the Applicant met with the Houston Housing Authority to request 149 project-based vouchers for this Development. See the letter from the former Executive Director of the Housing Authority at Exhibit A. The Executive Director expressed a desire to support the Development and indicated the Housing Authority was still considering its 2020 Administrative Plan for the Section 8 program. The Housing Authority wanted to coordinate its award of project-based vouchers with TDHCA's 2020 QAP, to make sure the two programs would work together. Thus, it waited until the 2020 QAP was approved to prepare and publish a Request for Proposals ("RFP") to distribute 1000 project-based vouchers, with a priority for permanent supportive housing. Due to the Housing Authority's attempt to coordinate its program with the definition of Supportive Housing in the 2020 QAP, the RFP was not published prior to the Full Application Delivery Date. Thus, the Applicant submitted everything it could to indicate that project-based vouchers were expected for this Development. This included a letter from the Houston Housing Authority, attached as Exhibit B and various narratives including:

From Tab 17 Development Narrative:

While the project will be encumbered with must pay permanent debt, the property will have a long-term Section 8 Project Based Housing Assistance Payment contract through the Housing Authority for 100% of the units (see letter from the Housing Authority). Resident feedback has been obtained at the community meeting held on January 18, 2020 (see attached sign-in sheet). In addition, the site is located less than ½ mile from regularly scheduled public transportation (see attached map) and at least 10% of the units meet the 2010 ADA standards.

From Tab 31 Schedule of Sources:

The rents are based on the anticipated Section 8 HAP Project Based Contract to be entered into with the Housing Authority before Final Closing. Project Based Vouchers have been requested and in order to accomodate his an RFP is to be issued by HHA. We expect an award during underwriting and hopefully an AHAP prior to July TDHCA Board meeting. HHA has set aside PBV's for supportive housing which have not yet been allocated.

Once the Houston Housing Authority made its RFP available, the Applicant submitted its proposal, consistent with its prior correspondence with the Housing Authority. A copy of the proposal is attached as Exhibit D. The Housing Authority currently expects to include an agenda

item for approval of vouchers for this Development on its board agenda for April 21, 2020, which is the first time the board will consider an award of vouchers under the RFP.

Satisfaction of QAP

An Application is, by its very nature, prospective. The Applicant is proposing a Supportive Housing Development that will be “financed with debt” and “supported by project-based rental or operating subsidies.” The Applicant has submitted evidence of its debt financing by the presentation of a term sheet from a lender which, as we all know, is conditional and subject to change if Housing Tax Credits are awarded. The Applicant has also submitted evidence of its intent for support by project-based rental subsidy, which can be proven up at an appropriate time, such as concurrently with the receipt of a Commitment.

It should be further noted that §11.1(d)(122)(E)(ii) includes various other criteria that are prospective, including:

- (IV) multiple systems *will be in place* for residents to provide feedback . . .
- (V) a resident is *or will be* a member . . .
- (VI) the Development’s Tenant Selection Criteria *will include* . . .
- (VII) the Development *will have* a comprehensive written eviction prevention policy . . .
- (VIII) the Development *will have* a comprehensive written services plan . . .

(emphasis added)

It is reasonable to interpret the requirement that a Supportive Housing Development be “supported by project-based rental or operating subsidies” as a prospective requirement, for which evidence can be provided at the time of Application but proven at the time of Commitment.

As noted in a recent letter from the Houston Housing Authority attached as Exhibit C, the Housing Authority fully intended to make project-based vouchers available to applicants in the 2020 9% Housing Tax Credit application cycle. Given that it was impossible for the Applicant to submit its proposal for the project-based vouchers prior to the Full Application Delivery Date, we believe the Department should conclude that the materials submitted with the Application, and those included with this Administrative Deficiency response, are sufficient to satisfy Section 11.204(8) of the QAP, which addresses threshold requirements for project-based vouchers and says:

(F) Rental Assistance/Subsidy. (§2306.6705(4)) If rental assistance, an operating subsidy, an annuity, or an interest rate reduction payment is proposed to exist or continue for the Development, any related contract or other agreement securing those funds or proof of application for such funds must be provided. Such documentation shall, at a minimum, identify the source and annual amount of the funds, the number of units receiving the funds, and the term and expiration date of the contract or other agreement.

The definition of Supportive Housing in the QAP should be interpreted consistently with the threshold provision above. The Application and the letter from the Housing Authority attached as Exhibit B indicate that the Applicant had requested project-based vouchers from the Houston Housing Authority, even before the RFP was available, and prior to the Full Application Delivery Date. The documentation identified the source and annual amount of funds, the number of Units receiving funds, and the proposed term of the HAP Contract. Final award of the project-based vouchers can be proven up as a condition to a Commitment, just like all other sources of financing are eventually proven up through the process. To require otherwise would contravene the spirit and intent of the 2020 changes to the definition of Supportive Housing – to encourage quality Supportive Housing by defining it based upon the residents to be served and the services to be provided, and allowing more financing options.

This Application is a high priority for the City of Houston, as evidenced by documentation found at Exhibit E. The Applicant expects to receive the vouchers on April 21. It would be a shame for a conservative interpretation of this definition to upend this Application, particularly when the evidence included in the Application can be considered sufficient and consistent with the QAP.

For all these reasons, we believe the Applicant has met the requirement that “the Development must be supported by project-based rental or operating subsidies for 25% of the Units.” The Application for this Development should be reinstated. If additional information is required, please feel free to contact us.

Sincerely,



Cynthia L. Bast

cc: NHP Foundation

- Exhibit A -- Letter from former Executive Director of Houston Housing Authority
- Exhibit B -- Letter from Houston Housing Authority Included in Original Application
- Exhibit C -- Supplemental Letter from Houston Housing Authority
- Exhibit D -- Proposal in Response to RFP
- Exhibit E -- Support Documentation

Exhibit A

PHActory Consulting

14511 Broadgreen Drive
Houston, Texas 77079
tgunsolley@phactoryconsulting.com
(713) 260-0501

Sharon D. Gamble MSW, PMP
Competitive (9%) Housing Tax Credit Program Administrator
Texas Department of Housing and Community Affairs
221 East 11th Street, Austin, Texas 78701-2410

Dear Ms. Gamble,

I was HHA CEO up until January of this year. I met with the NHP Foundation in August of 2019 where they requested 150 vouchers for the Magnificat Supportive Housing development. I subsequently toured the site in September. I suggested to them that they put off making a written request because I expected the HHA's 2020 Section 8 Annual Action Plan to include a provision that would allow us to allocate Project Based Vouchers non competitively if HHA was a part of the ownership of the partnership, and we wanted to so participate. We did not expect to issue a PBV RFP until TDHCA finalized its QAP. The Board of Commissioners chose not to include this sole sourcing provision for HHA to participate in ownership, when the Action Plan came into effect on January 1. Thus, with this direction to competitively procure the PBV recipients, HHA set out to seek eligible projects, particularly supportive housing projects, but timing did not allow commitment of the PBVs by TDHCA's application deadline.

Sincerely,

Tory Gunsolley
President

Exhibit B



HOUSTON
HOUSING AUTHORITY

Transforming Lives & Communities

2640 Fountain View Drive ■ Houston, Texas 77057 713.260.0500 P || 713.260.0547 TTY ■ www.housingforhouston.com

February 26, 2020

Mr. Neal Drobenare
The NHP Foundation
122 East 42nd Street, Suite 4900
New York, NY 10168

Magnificat Houses, Inc.
3209 Austin Street
Houston, TX 77004

Re: 3300 Caroline

Dear Mr. Drobenare:

The Houston Housing Authority (HHA) is supportive of NHP and Magnificat House's dedication to providing Permanent Supportive Housing (PSH) for deeply vulnerable individuals. HHA has been a leader in a broad coalition working to end homelessness in Houston and Harris County and our commitment to this project is consistent with those efforts. Eight (8) years ago, HHA committed to putting 1000 units of Project Based Vouchers (PBV) into PSH projects. To date, we are approaching our goal and strongly support the creation of these additional units.

NHP has requested HHA's support to attach PBVs to all 149 of the planned units in the Magnificat / 3300 Caroline Street development for twenty years. HHA plans to issue a Request for Proposals (RFP) for PBV developments within the next 60 days which will prioritize the selection of PSH developments. The RFP will allow HHA to accept and evaluate proposals on a rolling basis. Proposals that score well under the RFP criteria will be recommended to the HHA Board for PBV awards, a process that generally takes approximately 90 days from HHA's receipt of the proposal. Following HHA Board approval, the execution of an Agreement to Enter into a PBV Housing Assistance Payments Contract (AHAP) is subject to HUD's processing requirements.

For informational purposes, the payment standard for the zip code that 3300 Caroline Street is located in has been assigned a payment standard of 93% of the HUD Fair Market Rent (FMR). 93% of FMR for an efficiency unit in 2020 equals \$770 per month.

HHA encourages NHP and Magnificat House to submit a PSH proposal under the forthcoming RFP for PBV developments. HHA appreciates your commitment to affordable housing and, in collaboration with the Way Home Houston and this partnership, looks forward to our collaborative efforts to provide decent, safe and sanitary homes to homeless individuals.

Regards,

Mark Thiede
Interim President & CEO

Exhibit C



HOUSTON
HOUSING AUTHORITY

Transforming Lives & Communities

2640 Fountain View Drive ■ Houston, Texas 77057 ■ 713 260 0500 P ■ 713 2600547 TTY ■ www.housingforhouston.com

3/24/2020

Mr. Bobby Wilkinson
Executive Director
Texas Department of Housing and Community Affairs
221 East 11th Street
Austin, Texas 78701

Re: Program Coordination

Dear Mr. Wilkinson:

The Houston Housing Authority strives to be a good partner with the Texas Department of Housing and Community Affairs in the administration of the low-income housing tax credit program. Our two agencies share a goal to prioritize supportive housing in our programs, so that we may increase our capacity to serve extremely-low and very-low income residents. When TDHCA proposed changes to its definition of Supportive Housing for the 2020 QAP, we took note and considered how we could implement our programs in a manner that would coordinate with TDHCA's priorities.

The Houston Housing Authority's 2020 Administrative Plan for the Housing Choice Voucher program allows the Housing Authority to issue a request for proposals (RFP) for owners and developers desiring to implement project based vouchers (PBV). In selecting PBV recipients, the Plan calls for the Housing Authority to consider:

- Extent to which the project supports HHA goals related to permanent supportive housing, youth aging out of foster care, reducing homelessness, support for City and/or other revitalization initiatives and/or other goals identified in the RFP; and
- Extent to which the project demonstrates an appropriate supportive services plan based on projected resident needs.

On March 4, 2020, the Housing Authority published an RFP for PBVs. In the RFP, we strongly encouraged proposals to include permanent supportive housing and supportive housing for transition age youth aging out of foster care. Our evaluation criteria are weighted to incentivize supportive housing for the chronically homeless. Specifically, the RFP has a maximum score of 120, with a score of 70 needed to win an allocation. Supportive housing projects can score up to 40 points for serving a homeless population and having a high quality supportive services plan. Projects in a high opportunity area can score an additional 20 points.

We have specifically identified up to 1,000 PBVs to be available for supportive housing developments through the RFP process. We anticipated this would allow the Housing Authority to provide subsidy for supportive housing developments proposed for the City of Houston in the 2020 low-income housing tax credit cycle, which meet PBV program requirements. The first in a series of RFPs, RFP 18-20 was posted on March 4, 2020, and was closed on March 18, 2020. A second, identical RFP, RFP 20-22, is now posted with a closing date of March 31, 2020. In response to RFP 18-20, we received 2 proposals requesting PBVs. HHA reviews and evaluates all proposals received in accordance with the RFP and PBV program requirements. Recommended projects are subject to approval by the HHA Board of Commissioners. Our decision on awarding PBVs is expected to be made in the next 60 days, well in advance of TDHCA's deadline to award low-income housing tax credits. This should allow TDHCA to confirm whether an applicant in Houston has received an award of PBVs, if such is needed to fulfill TDHCA's requirements for a supportive housing development.

If you have any questions about the Housing Authority's administration of its PBV program, please do not hesitate to contact me.

Sincerely,



**Mark Thiele, CS-PHM, CME, CMVO, NCC
Interim President & CEO
Houston Housing Authority**

Exhibit D

**Houston Housing Authority
RFP 20-18**

**Project: 3300 Caroline Street (Magnificat)
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Tab 1.	Application for Project Based Voucher Assistance
Tab 2.	Application Section 5: Tenant Selection Plan
Tab 3.	Application Section 10. Deconcentration of Poverty
Tab 4.	Application Section 12. Site and Neighborhood Standards
Tab 5.	Application Section 13: PBV Contract Units (chart)
Tab 6.	Application Section 14: Experience Owning Rental Housing
Tab 7.	Application Section 15: Experience Managing Rental Housing
Tab 8.	Application Section 17: Management Plan
Tab 9.	Application Section 18: Additional Information
	18b. Zoning
	18c. Site Control
	18d(i). Site Plan/Elevations
	18d(ii). Sources and Uses
	18d(iii). Operating Proforma
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Attachment A:	Declaration
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Appendix A - Application for Project Based Voucher Assistance

Houston Housing Authority (HHA) requires that a separate proposal be submitted for each project for which Project Based Voucher (PBV) assistance is requested. A completed Application for Project Based Voucher Assistance must be included in each proposal. Proposers must follow these instructions:

- Proposal submission instructions are provided in part “4.0 Submittals” of HHA’s solicitation. As noted therein, in addition to a CD ROM or Flash Drive, one (1) original and one (1) copy of the proposal must be submitted by the specified due date. The hard copy materials must include a table of contents and be organized into three ring binders that are divided by labeled tabs to clearly note the contents of each section.
- There are nineteen (19) numbered sections of the Application for PBV Assistance. Proposers must respond to all sections except:
 - ✓ Section 11 – Applies only to Existing and Substantial Rehabilitation Projects
 - ✓ Section 12 – Applies only to New Construction Projects
 - ✓ Section 18 – Applies only to New Construction and Substantial Rehabilitation Projects
- Use the fillable fields in the application form to provide information wherever possible. If additional information is required, include it in the proposal submission in a separate, labeled tab. For example, Section 5 of the application form requires submission of a Tenant Selection Plan and Lease. This information should be included in a tab labeled “Section 5 Tenant Selection Plan and Lease”.

Houston Housing Authority - Application for Project Based Voucher Assistance

1. Owner Information

Date of Submission: 3/18/20

Owner Name: NHP Foundation, Inc.

Corporate Status (e.g.501(c)3, Corporation, LP, LLC, Sole Proprietor, Other): 501(c)3

Address: 122 E. 42nd Street, Suite 4900, New York, NY 10168

Contact Person: Neal Drobenare

Phone Number: 202-316-7351

Email Address: ndrobenare@nhpfoundation.org

2. General Project Information

Proposed PBV Project Name: 3300 Caroline Street

Total Units Proposed for PBV Assistance: 149 # Currently Occupied: 0

Legal Name of Project Owner: Magnificat Permanent Affordable, LLC

Proposed PBV Project Address: 3300 Carline Street

Management Company/Agent for Proposed PBV Project: Allied-Orion

Project Type (Existing, New Construction or Rehabilitation): New Construction

Number of Buildings in Project: 149 Total Acreage of Project Site: 1.148

Number of Units in Project that are Single Family Homes: 0

3. Summary of Project Units

Complete the bedroom distribution chart below for the overall project and for the requested PBV contract units.

	OBR	IBR	2BR	3BR	4BR	5BR	Total
All Units in Project	149						149
Total Proposed PBV Contract Units	149						149
# of Proposed PBV Units that are ADA handicapped accessible	12						12
# of Proposed PBV Units that are equipped for sensory impaired	5						5

4. Resident Population

Who is the intended target population for the proposed PBV units? Check All That Apply:

- Single Persons Families with children Elderly (over 62 years) Disabled
- "Qualifying" family or person requiring participation in a program of supportive services
- Homeless At risk of homelessness
- Transition Age Youth Aging Out of Foster Care (TAY)
- Other (please define) _____

5. Tenant Selection Plan and Lease

Attach a copy of the proposed tenant selection plan to occupy PBV units and the lease to be entered into between owner and tenant. Note that HHA will utilize its PBV wait list to refer applicants to project owners. HHA will determine eligibility and occupancy standards for the program, and then refer eligible applicants to the owner for screening. The lease must include the required PBV Tenancy Addendum, the provisions of which shall take precedence over any other lease terms. The tenant selection plan must include a statement that applicants for the PBV units will be selected in accordance with all applicable HUD requirements and regulations. If participation in a supportive services program is required, incorporate detailed information on the requirements and how the program will be monitored. At a minimum, the plan must address the following:

- Screening policies and criteria to be used. If credit checks are used, describe acceptability criteria. Screening for credit and other factors must be consistent with the screening criteria used for non-assisted tenants
- Security deposit policies
- Procedures for accepting applications and selecting from the waiting list
- Unit transfer policies
- Compliance with Section 504 of the Rehabilitation Act of 1973, Fair Housing Act and relevant civil rights laws & statutes

6. Requested Contract Term

The initial HAP contract term can be for a maximum term of 15 years. Indicate the length of initial HAP contract term requested by owner: 15 Years

7. Other Project Based Assistance

Are the proposed PBV units assisted through the Low Income Housing Tax Credit program? Yes
 No

Do any units within the proposed PBV project have another form of rental or other government assistance*?
 Yes No

*Refer to 24 CFR 983.54 for further information.

If Yes, describe type of assistance and units that are impacted. _____

8. Affordability Restrictions

Is there a housing affordability restriction in the deed or other document? Yes No

If Yes, describe the housing program requiring the restriction and the date of expiration. 9% LIHTC 30 Year extended use

If Yes, describe type of assistance and units that are impacted. Capital Funds/All impacted-restricted

9. Amenities

Unit Amenities

Check off any amenities that will be provided. Add others below if not included on this list.

- Features adapted/adaptable for persons with disabilities
- Air conditioning
- Off street parking
- Laundry facilities
- Porches, decks, personal backyard
- Children’s play areas
- Recreational facilities
- Common area function room(s)
- Other _____

Community Amenities

Distance To:	Less than .5 Mile	Approx. 1 Mile	More Than 1 Mile
Shopping, groceries, pharmacy, other everyday type of needs	X		
Employment Opportunities (i.e. organizations with 25 or more employees)	X		
Public Transportation	X		
Medical facilities	X		
Public Schools	X		
Parks, civic facilities	X		

10. Deconcentration of Poverty, Expanding Housing and Economic Opportunities and City-Designated Revitalization Area

Census Tract of Proposed PBV Project: 48201312500 Poverty Rate*: 14

*Census tracts and poverty rates can be found by entering complete address and zip code at the following website: <http://factfinder2.census.gov/faces/nav/jsf/pages/index.xhtml>

Elementary School Zone: Gregory Lincoln Ed Station Center Met Standard Rating for Index 1 Student Achievement: D
 Middle School Zone: Gregory Lincoln Ed Station Center Met Standard Rating for Index 1 Student Achievement: D
 High School School Zone: Lamar Met Standard Rating for Index 1 Student Achievement: B

Is the proposed project located in a census tract designated by the City of Houston as a revitalization area? yes

Type text here
Applicants for PBV assistance must demonstrate that the proposed PBV project is consistent with HUD’s statutory goal of “deconcentrating poverty and expanding housing and economic opportunities”, regardless of the project’s poverty rate as defined by the most recent census data. Provide a detailed, separate response to each of the criteria listed below. If necessary, attach additional documentation. Note that HHA will utilize responses to this section to assign scores for the “High Opportunity and City-Designated Revitalization Area” evaluation criteria.

HUD Designated Zone - Whether the census tract in which the proposed project will be located is in a HUD-designated Enterprise Zone, Economic Community, or Renewal Community.

No

Public Housing Demolition - Whether a PBV development will be located in a census tract where the concentration of assisted units will be or has decreased as a result of public housing demolition.

No

Significant Revitalization - Whether the census tract in which the proposed PBV development will be located is undergoing significant revitalization.

yes

Public Investment - Whether state, local, or federal dollars have been invested in the area that has assisted in the achievement of the statutory requirement.

yes

New Market Rate Units - Whether new market-rate units are being developed in the same census tract where the proposed PBV development will be located and the likelihood that such market-rate units will positively impact the poverty rate in the area.

yes

Decline in Poverty Rate - If the poverty rate in the area where the proposed PBV development will be located is greater than 20 percent, the PHA should consider whether in the past five years there has been an overall decline in the poverty rate.

N/A

Education and Economic Opportunities - Whether there are meaningful opportunities for educational and economic advancements in the census tract where the proposed PBV development will be located.

yes

11. Site and Neighborhood Standards: Existing and Rehabilitated Housing Projects

Only proposals for PBV assistance in Existing or Rehabilitated projects must complete this section. Applicants must provide a brief narrative indicating how the proposed project conforms to the required site and neighborhood standards for these housing types. For each of the four criteria listed below, provide a detailed narrative. Attach any additional materials as needed. Note that HHA will utilize responses to this section to assign scores for the “High Opportunity and City-Designated Revitalization Area” evaluation criteria.

(1) The site must be adequate in size, exposure and contour to accommodate the number and type of units proposed, and is there adequate utilities and available streets to service the site.

N/A

(2) The site must promote greater choice of housing opportunities and avoid undue concentration of assisted persons in areas containing a high proportion of low-income persons.

N/A

(3) The site must be accessible to social, recreational, educational, commercial and health facilities and services and other municipal facilities and services that are at least equivalent to those typically found in neighborhoods consisting largely of unassisted, standard housing of similar market rents; and,

N/A

(4) The site must be located such that travel time and cost via public transportation or private automobile from the neighborhood to places of employment providing a range of jobs for lower income workers is not excessive.

N/A

12. Site and Neighborhood Standards: New Construction Projects

Only proposals for PBV assistance in New Construction projects must complete this section. Applicants must provide a brief narrative indicating how the proposed project conforms to the required site and neighborhood standards for these housing types. For each of the seven criteria listed below, provide a detailed narrative. Attach any additional materials as needed. Note that HHA will utilize responses to this section to assign scores for the “High Opportunity and City-Designated Revitalization Area” evaluation criteria.

(1) The site must be adequate in size, exposure, and contour to accommodate the number and type of units proposed, and adequate utilities (water, sewer, gas, and electricity) and streets must be available to service the site;

See attachment 12 A

(2) The site must not be located in an area of minority concentration, except as permitted under paragraph (3) below, and must not be located in a racially mixed area if the project will cause a significant increase in the proportion of minority to non-minority residents in the area. See attachment 12B

(3) A project may be located in an area of minority concentration only if:

(i) Sufficient, comparable opportunities exist for housing for minority families in the income range to be served by the proposed project outside areas of minority concentration; or

(ii) The project is necessary to meet overriding housing needs that cannot be met in that housing market area.

(iii) As used in paragraph 3)(i) above, “sufficient” does not require that there be an equal number of assisted units within and outside of areas of minority concentration. Rather, application of this standard should produce a reasonable distribution of assisted units each year that, over a period of several years, will approach an appropriate balance of housing choices within and outside areas of minority concentration. An appropriate balance must be determined in light of local conditions affecting the range of housing choices available for low-income minority families and in relation to the racial mix of the City’s population.

(iv) Units may be considered “comparable opportunities,” as used in paragraph 3)(i) above, if they have the same household type (elderly, disabled, family, large family) and tenure type (owner/renter); require approximately the same tenant contribution towards rent; serve the same income group; are located in the same housing market; and are in standard condition.

(v) Application of this sufficient, comparable opportunities standard involves assessing the overall impact of HUD-assisted housing on the availability of housing choices for low-income minority families in and outside areas of minority concentration, and must take into account the extent to which the following factors are present, along with other factors relevant to housing choice:

(A) A significant number of assisted housing units are available outside areas of minority concentration.

(B) There is significant integration of assisted housing projects constructed or rehabilitated in the past 10 years, relative to the racial mix of the eligible population.

(C) There are racially integrated neighborhoods in the locality.

(D) Programs are operated by the locality to assist minority families that wish to find housing outside areas of minority concentration.

(E) Minority families have benefited from local activities (*e.g.* , acquisition and write-down of sites, tax relief programs for homeowners, acquisitions of units for use as assisted housing units) undertaken to expand choice for minority families outside of areas of minority concentration.

(F) A significant proportion of minority households has been successful in finding units in non-minority areas under the tenant-based assistance programs.

(G) Comparable housing opportunities have been made available outside areas of minority concentration through other programs.

(vi) Application of the “overriding housing needs” criterion, for example, permits approval of sites that are an integral part of an overall local strategy for the preservation or restoration of the immediate neighborhood and of sites in a neighborhood experiencing significant private investment that is demonstrably improving the economic character of the area (a “revitalizing area”). An “overriding housing need,” however, may not serve as the basis for determining that a site is acceptable, if the only reason the need cannot otherwise be feasibly met is that discrimination on the basis of race, color, religion, sex, national origin, age, familial status, or disability renders sites outside areas of minority concentration unavailable or if the use of this standard in recent years has had the effect of circumventing the obligation to provide housing choice.

(4) The site must promote greater choice of housing opportunities and avoid undue concentration of assisted persons in areas containing a high proportion of low-income persons.

See attachment 12 C

(5) The neighborhood must not be one that is seriously detrimental to family life or in which substandard dwellings or other undesirable conditions predominate, unless there is actively in progress a concerted program to remedy the undesirable conditions.

See attachment 12 D

(6) The housing must be accessible to social, recreational, educational, commercial, and health facilities and services and other municipal facilities and services that are at least equivalent to those typically found in neighborhoods consisting largely of unassisted, standard housing of similar market rents.

See attachment 12 E

(7) Except for new construction housing designed for elderly persons, travel time, and cost via public transportation or private automobile from the neighborhood to places of employment providing a range of jobs for lower-income workers, must not be excessive.

See attachment 12 F

14. Experience Owning Rental Housing (check if any apply):

- a. 10 years or more of experience owning affordable rental housing
 1-9 years of experience owning affordable rental housing
 10 years or more of experience owning other rental housing
 1 to 9 years of experience owning other rental housing
 - b. Describe below your experience, including the number of years of experience in owning rental housing, the amount of that time devoted to affordable rental housing, if applicable; the number of units (specify separately number of affordable and other rental units); if the portfolio includes subsidized properties, the address(es) and funding source(s), and if assistance has ever been terminated. If assistance has been terminated, please identify the program(s) and state why. Attach any additional materials as needed.
-

15. Experience Managing and Maintaining Rental Housing (check if any apply):

- a. 10 years or more of experience managing and maintaining affordable rental housing
 1 to 9 years of experience managing and maintaining affordable rental housing
 10 years or more of experience managing and maintaining other rental housing
 1 to 9 years of experience managing and maintaining other rental housing
 - b. Describe below owner's experience as a property manager or the experience of owner's designated property manager, including the number of years of experience in managing and maintaining rental housing, number and type of units under management, the amount of that time devoted to affordable rental housing. Attach any additional materials as needed.
-

16. Public Purpose (check if any apply):

- 75% or more units in building would be restricted to low- or very-low income occupancy
- 50% to 74% of units in building would be restricted to low- or very-low income occupancy
- Units meet other City-identified priority needs such as supportive housing

Identify below what other City-identified priority would be met through the project-basing of units. Attach any additional materials as needed.

17. Applicant’s Plans for Management and Maintenance of Units:

- a. Is there a written plan for management and maintenance of the proposed PBV units?
 Yes No

If "Yes," please include the management and maintenance plan as an attachment to this application. If "No," please provide a description of how units will be managed and maintained, both on an on-going and long-term basis, focusing on property management, preventive maintenance, routine maintenance, emergency repairs, security, and health and safety-related areas. Describe the personnel/positions to be assigned to management and maintenance of the proposed project, hours of operation, location of management/maintenance offices and other pertinent information.

- b. If applicable, describe any supportive services that will be provided to tenants. Complete the chart below and include as an attachment letters of commitment from service providers.

POPULATION	TYPE OF SERVICE	SERVICE PROVIDER
Chronic Homeless	Resident Service Coordnation	Magnificat Houses, Inc.

18. Additional Information for New Construction and Substantial Rehabilitation Projects

This section applies only to proposed new construction or substantial rehabilitation projects.

- a. Construction Schedule:** Complete the following schedule.

Finance Closing	<u>November 2020</u>
Construction Start Date	<u>November 2020</u>
Construction Completion Date	<u>May 2022</u>
Occupancy Date	<u>May 2022</u>

- b. Zoning and Other Approvals:** Have all zoning and other required approvals including historic and environmental review as appropriate been received? **Yes** **No**

If **No**, provide a description of current status of required approvals including an estimate of when all required approvals will be secured . _____

- c. Site Control:** Does Owner have site control over the proposed site? **Yes** **No**

Provide a brief description of the nature of the owner’s site control. Attach documentation where needed, i.e. a copy of site control contract, etc. _____

d. Include the following attachments with the application:

- Description of project work plans such as site/unit plans and elevations
- Statement of Sources and Uses for Funds to develop the project
- Operating pro forma
- Documentation regarding compliance with Davis — Bacon Wage rates if nine (9) or more units are proposed for project based assistance.

19. Certifications

Provide the required information on a separate sheet of paper and attach to this application:

1. The identity of the owner and other project principals and the names of officers and principal members, shareholders, investors, and other parties having a substantial interest in the project;
2. A certification stating that the above-mentioned parties are not on the U.S. General Services Administration list of parties excluded from Federal procurement and non-procurement programs;
3. A disclosure of any possible conflict of interest by any of these parties that would be a violation of the PBV Housing Assistance Payments (HAP) contract.

Neal Drobenare , attest and certify that all of the information herein contained is true and accurate to the best of my knowledge. I understand that by submitting this application for project-based assistance application there is no commitment from the Houston Housing Authority that my proposal will be accepted. I understand that in-place existing tenants must be certified as eligible to receive project-based assistance, and if they are not eligible, I may not displace them in order to qualify their unit for PBV. I understand and agree to abide by all applicable federal Section 8 requirements found at 24 CFR Part 983 and HHA's PBV requirements found in its Administrative Plan.

Signature of Owner	Title	Date
--------------------	-------	------

Exhibit E



CITY OF HOUSTON

Housing & Community Development Department

Sylvester Turner

Mayor

Tom McCasland
Director
2100 Travis, 9th Floor
Houston, Texas 77002

T. (832) 394-6200
F. (832) 395-9662
www.houstontx.gov/housing

April 13, 2020

Mr. Bobby Wilkinson,
Executive Director
Texas Department of Housing and Community Affairs
221 East 11th Street
Austin, Texas 78701

Re: TDHCA No. 20114; 3300 Caroline Street

Dear Mr. Wilkinson:

Magnificat Permanent Affordable, LLC (Applicant) submitted an application to the Texas Department of Housing and Community Affairs (TDHCA) for 9% housing tax credits to facilitate the construction of a permanent supportive housing development to be located at 3300 Caroline Street, Houston, Texas 77004 (Development Site). The proposed development will be a 149-unit supportive housing development within the Midtown area of Houston. This area and the development site is undergoing gentrification as it is well situated along major commercial and transit corridors of Houston.

Please let this letter serve to recognize that the City of Houston supports the development of 3300 Caroline Street as evidenced by a resolution of support issued to the Applicant. Additionally, 3300 Caroline Street is a proposed permanent supportive housing development which are prioritized within its selection criteria for support resolutions. The City partners with several agencies including the Coalition for the Homeless, Harris County and other partners to supplement the deficiency of the supportive housing needed to care for the growing population of homeless within the City. Development proposals like 3300 Caroline Street will assist the City and its partners to effectively prevent and end homelessness.

We hope that you will take these findings into consideration in the review of the application for 3300 Caroline Street.

Sincerely,

A handwritten signature in black ink, appearing to read "Ray S. Miller".

Ray S. Miller
Assistant Director

EXHIBIT B

**HOUSTON HOUSING AUTHORITY
APPROVAL FOR PBVS**



HOUSTON
HOUSING AUTHORITY

Transforming Lives & Communities

MEMORANDUM

TO: MARK THIELE, INTERIM PRESIDENT & CEO
FROM: ROBIN WALLS, VICE PRESIDENT OF HCVP
SUBJECT: DISCUSSION TO AWARD OF PROJECT-BASED VOUCHERS TO MAGNIFICAT PERMANENT AFFORDABLE LLC AT 3300 CAROLUNE STREET, HOUSTON, TX
DATE: APRIL 14, 2020

This memorandum recommends that the Houston Housing Authority Board of Commissioners, authorizes the Interim President & CEO to negotiate, execute, and make necessary changes and corrections to conditionally award one hundred forty-nine (149) Project-Based Vouchers to Magnificat Permanent Affordable, LLC for the development at 3300 Caroline St. Houston, TX 77004.

BACKGROUND:

HUD authorizes HHA to administer a Project-Based Voucher (PBV) program as a part of its Housing Choice Voucher Program. The HHA Board of Commissioners created the PBV program in June 21, 2011 in accordance with Resolution No. 2524, *HCV Administrative Plan Attachment – Project-Based Voucher (PBV) Program Plan*. For project-based voucher assistance, HHA may use up to twenty (20) percent of its total authorized number of vouchers. This is known as “project-basing” what are otherwise tenant-based vouchers. Agencies may use an additional 10% of their authorized vouchers for project-basing to serve:

1. Homeless families and individuals;
2. Families with veterans;
3. Disabled and elderly person provided supportive services;
4. In low-poverty areas where vouchers are difficult to use agencies may project base up to 40% of a project’s units;
5. An initial contract term can be up to 20 years;
6. Project-based contracts have priority when appropriated funds are insufficient;
7. PHAs may enter into a HAP contract with owner of new or under-construction units;

HHA may determine that circumstances exist where it is advantageous to project-base vouchers rather than tenant-basing the same subsidy. PBVs allow the property owners to leverage the voucher subsidy, which can be valuable to the HHA in achieving certain goals. Employed appropriately, PBVs can encourage new construction, rehabilitation or acquisition of existing properties; promote voucher utilization; expand housing choices; serve special populations; increase supportive housing options and deconcentrate poverty.

The intent of the RFP 20-18, was to solicit proposals for eligible properties from eligible property owners for PBV assistance. Under HUD regulations, certain properties owned or controlled by HHA are eligible for

PBV assistance and may be eligible for selection under this RFP. HHA will enter into PBV HAP Contracts with selected property owners for designated rental units for an initial term of up to twenty (20) years subject to funding availability. Rental assistance subsidies will be provided while eligible families occupy the rental housing units and the units meet other program standards. HHA’s published subsidy standards will determine the appropriate unit size for the family size and composition.

EVALUATION PROCESS

To evaluate the proposals submitted, HHA established a PBV Selection Panel made up of the following three (3) HHA Staff:

- Robin Walls, Vice President, HCVP
- Mike Rogers, Director of Finance
- Jonathon Zimmerman, Senior Policy Analyst

The proposals were evaluated according to the following six (6) criteria:

Evaluation/Selection Criteria	Maximum Score	Magnificat Permanent Affordable, LLC
Supportive Services Plan and Capacity (Evaluated for all PSH, VASH and no-elderly/disabled projects for which more than 25% of units are proposed for PBV assistance or the project will serve the TAY preference)	20	14
Financial Feasibility (Evaluated for all projects)	20	14
Previous Experience of Applicant in Development and Property Management of Projects of Similar Scale for Similar Target Populations (Evaluated for all projects)	20	20
Project Design (Evaluated for all projects)	20	12
Development Serves the Homeless or Chronic Homeless Community (Evaluated for all projects) or the project will serve the TAY preference	20	20
High Opportunity or City-Designated Revitalization Area (Evaluated for all projects)	20	20
Total Points Possible (70% of Possible Points Required for Award)	120	100

Based on a review and evaluation of the proposal, the selection panel recommends that the HHA Board of Commissioners approve the conditional selection of the 3330 Caroline Street project for one hundred and forty-nine (149) PBV vouchers. This selection is subject to the following conditions:

- The project owner must provide evidence of the firm commitment of all project financing sources including, but not limited to, documentation of the award of Low-Income Housing Tax Credits and City of Houston funds to the project.

- The project owner must provide evidence of the firm commitment of funds needed to implement the Supportive Services Plan for the site over the term of the PBV contract.

As a new construction project, HHA and the project owner must enter into an Agreement to Enter into a Housing Assistance Payments Contract (AHAP). Construction cannot commence until the AHAP is executed. In addition to the conditions noted above, in advance of executing the AHAP:

- A subsidy layering review must be completed by HUD or a recognized Housing Credit Agency, with a determination made that the PBV assistance is in accordance with HUD subsidy layering requirements. The project owner must provide all information required for the subsidy layering review on a timely basis.
- An environmental review must be completed by the City of Houston, and the environmental certification or categorical exclusion has been approved by HUD. The project owner must provide all information required for the environmental review on a timely basis.
- The project owner must provide to HHA all of the information needed to execute the AHAP documents including, but not limited to, submission of a detailed work description that includes working drawings and specifications and all other requirements found at 24 CFR 983.152

DESCRIPTION OF WINNING PROPOSAL

Magnificat

Since 1968, Magnificat Houses, Inc. has proved to be an alternative to the streets by sheltering, clothing, feeding and providing mental health support and spiritual guidance to men and women – of all mental abilities, social backgrounds, religions and cultures – as they rebuild their lives in community. MHI privately operate 16 residential homes, a Clubhouse for the mentally ill and a large downtown soup kitchen — not as an agency, but as a ministry motivated by the belief that all are created with dignity and worth.

MHI service sites include:

- Fifteen neighborhood residences for men and women, most centrally located in Midtown Houston
- Loaves and Fishes Soup Kitchen on Congress near Minute Maid Park
- Clubhouse for members with serious and persistent mental illnesses, Midtown
- Skills-building training at Moran Center, Mustard Seed Resale Shop, Anawim Thrift Store, our business offices and in the residences
- Myriam’s Hostel, an emergency shelter for homeless women, downtown
- A six-acre rehabilitation farm

NHP Foundation (NHP) and Magnificat Homes, Inc. are developing 3300 Caroline for the homeless in Midtown Houston. Midtown is rapidly gentrifying and has traditionally been the home to a number of low and extremely low-income persons, many of whom are homeless or at-risk of homelessness. The widespread development of high-end, market rate housing in the area over the past decade has driven up housing costs and resulted in widespread displacement of this population and the services that support them. In order to maintain the diversity of the community and offer housing options for the homeless residents of the area, it is important to create supportive housing in this neighborhood. To this end, 3300 Caroline will provide 149 units of service-enriched housing targeted to homeless and at-risk households.

The project will have extensive common space that will be used for on- site social services for tenants, including service coordination, case management, and educational services.

NHP has partnered with Magnificat Houses, Inc. to provide the intensive supportive services that many of the tenants will require. The goal is to create a service delivery system that can adapt to the changing needs and circumstances of the tenants during initial occupancy and throughout the life of the project.

PROPERTY DETAILS

- 4 story building
- 149 Efficiency Units (108 Standard Units @336 SF AND 41 Extended Units @ 405 SF)
- Accessible Units (ADA Standards, Section 504, & Harris County): (12) Units provided with accommodations for Mobility Impaired (accessible) and (5) Units provided with Hearing and Visually Impaired equipment

The development will include the following amenities to serve the residents:

1. Training Room
2. Business Center
3. Reading Room
4. Meeting Room
5. Dining Room
6. Kitchen
7. Theater
8. 3 offices
9. Social Service Open Area

RECOMMENDATION

Accordingly, I recommend that the Board considers this resolution, which states:

Resolution: That the Houston Housing Authority Board of Commissioners authorizes the Interim President & CEO to negotiate, execute and make necessary changes and corrections to conditionally award one hundred forty-nine (149) Project-Based Vouchers to Magnificat Permanent Affordable, LLC at 3300 Caroline St. Houston, TX 77004, pursuant to the April 14, 2020 memorandum from Robin Walls, Vice President of HCVP to Mark Thiele, Interim President & CEO.

BOARD ACTION ITEM
MULTIFAMILY FINANCE DIVISION
MAY 21, 2020

Presentation, discussion, and possible action on timely filed appeals under the Department's Multifamily Program Rules. Application 20148 High View Place

RECOMMENDED ACTION

WHEREAS, the appeal relates to Competitive Housing Tax Credit (HTC) application 20148 High View Place, which was submitted to the Department by the Full Application Delivery Date;

WHEREAS, a scoring notice was provided to the Applicant identifying points that the Applicant elected but that staff determined the Application did not qualify to receive under 10 TAC §11.9;

WHEREAS, the Applicant timely filed an appeal; and

WHEREAS, the Executive Director denied the appeal;

NOW, therefore, it is hereby

RESOLVED, that the scoring appeal for 20148 High View Place is hereby denied.

BACKGROUND

10 TAC §11.9, related to Competitive HTC Selection Criteria, identifies the scoring criteria used in evaluating and ranking Applications. It includes those items required under Tex. Gov't Code Chapter 2306, §42 of the Internal Revenue Code (the Code), and other criteria established in a manner consistent with Chapter 2306 and §42 of the Code.

The Application proposes the Acquisition and Rehabilitation of 70 restricted Units for the general population in Killeen.

Staff determined that the Application does not qualify for points under 10 TAC §11.9(d)(7) Concerted Revitalization Plan because the application only included a HUD Comprehensive Plan and CAPER. Staff issued a scoring notice alerting the Applicant of the loss of seven points, subject to the Applicant's ability to appeal. Per the rule:

(A) For Developments located in an Urban Area:

(i) An Application may qualify to receive points if the Development Site is located in a distinct area that was once vital and has lapsed into a condition requiring concerted revitalization, and where a concerted revitalization plan (plan or CRP) has been developed and executed.

(ii) A plan may consist of one or two, but complementary, local planning documents that together create a cohesive agenda for the plan's specific area. The plan and supporting documentation must be submitted using the CRP Application Packet. No more than two local plans may be submitted for each proposed Development. **A Consolidated Plan, One-year Action Plan or any other plan prepared to meet HUD requirements will not meet the requirements under this clause, unless evidence is presented that additional efforts have been undertaken to meet the requirements in clause (iii) of this subparagraph.** The concerted revitalization plan may be a Tax Increment Reinvestment Zone (TIRZ) or Tax Increment Finance (TIF) or similar plan. A city- or county-wide comprehensive plan, by itself, does not equate to a concerted revitalization plan.

The appeal describes the steps that were taken by the City of Killeen in developing its HUD Consolidated Strategic Plan for 2015-2019 (the Plan) and states that “while it is true that this Application relied upon the Consolidated Strategic Plan for the City of Killeen, it also provided ample evidence ‘that additional efforts have been undertaken to meet the requirements in clause (iii) of this subparagraph.’” Per the appeal, the “degree of detail (unusual in a Comprehensive Plan) was clearly intended to implement the revitalization initiatives within the North Killeen Local Target Area without the necessity of a subsequent implementing plan, as is sometimes used by cities.”

After reviewing the Plan, staff did not find evidence that additional efforts beyond anything already prepared to meet HUD requirements were undertaken to meet the rule requirements. While it is clear that the Consolidated Plan *could* be used as a basis to meet the requirements of the rule, the rule requirement to present evidence of “additional efforts” appears to require the presentation of evidence outside of the Consolidated Plan showing such additional efforts beyond what is set out in the HUD plan. The appeal seems to take the opposite view – that such evidence of “additional effort” can be seen entirely within the Consolidated Plan, itself:

In this instance, in developing its Consolidated Strategic Plan for 2015 – 2019 (the “Plan”), the City of Killeen went to the effort to identify by public comment the area within the city that most required revitalization. The area identified was the North Killeen Local Target Area, which includes the central business district, the historical area, the Stewart Neighborhood and the High View Development Site. The City used the Plan to establish an implementation plan by which problems identified by the local residents in the North Killeen Local Target Area could be mitigated. Additionally, funding was allocated for some initial infrastructure projects within the North Killeen Local Target Area. In accomplishing all of this, the City went beyond the customary consolidated plan and established the identification of problems, possible solutions and funding for the specific targeted area – in fact, documenting every requirement of clause (iii) of Section 11.9(d)(7)(a) of the QAP.

Without clear evidence that the “additional efforts” clause of the rule has been met, Staff found that the Application did not qualify for seven points under §11.9(d)(7) related to Concerted Revitalization Plan, and recommends the Board deny the appeal.

20148 High View Place

Scoring Notice



MULTIFAMILY FINANCE PRODUCTION DIVISION
Housing Tax Credit Program - 2020 Application Round
Scoring Notice - Competitive Housing Tax Credit Application

Arthur J. Schuldt, Jr.

Phone #: (318) 213-6502

Email: art@callhsa.com

Second Email: mstrange@callhsa.com

Date: April 28, 2020

**THIS NOTICE WILL ONLY BE
TRANSMITTED VIA EMAIL**

**RE: 2020 Competitive Housing Tax Credit (HTC) Application for High View Place, TDHCA Number:
20148**

The Texas Department of Housing and Community Affairs has completed its program review of the Application referenced above as further described in the 2020 Qualified Allocation Plan (QAP). This scoring notice provides a summary of staff's assessment of the application's score. The notice is divided into several sections.

Section 1 of the scoring notice provides a summary of the score requested by the Applicant followed by the score staff has assessed based on the Application submitted. You should note that six scoring items are not reflected in this scoring comparison but are addressed separately.

Section 2 of the scoring notice includes each of the six scoring criteria for which points could not be requested by the Applicant in the application self-score form and include: §11.9(c)(8) Readiness to Proceed in Disaster Impacted Counties, §11.9(d)(1) Local Government Support, §11.9(d)(4) Quantifiable Community Participation, §11.9(d)(5) Community Support from State Representative, §11.9(d)(6) Input from Community Organizations, and §11.9(d)(7) Concerted Revitalization Plan.

Section 3 provides information related to any point deductions assessed under §11.9(f) and/or §11.201(7)(B) of the QAP.

Section 4 provides the final cumulative score in bold.

Section 5 includes, as applicable, notes and an explanation of any differences between the requested and awarded score, as well as any penalty points assessed.

The scores provided herein are merely informational at this point in the process and may be subject to change. For example, points awarded under §11.9(e)(4) "Leveraging of Private, State, and Federal Resources", 11.9(b)(1)(A) "Unit Sizes", 11.9(b)(1)(B) "Unit and Development Features", 11.9(c)(1) "Income Levels of Tenants", 11.9(c)(2) "Rent Levels of Tenants", 11.9(e)(1) "Financial Feasibility", 11.9(e)(3) "Pre-Application Participation", and may be adjusted should the underwriting review result in changes to the Application that would affect these scores. If a scoring adjustment is necessary, staff will provide the Applicant a revised scoring notice.

Be further advised that if the Applicant failed to properly disclose information in the Application that could have a material impact on the scoring information provided herein, the score included in this notice may require adjustment and/or the Applicant may be subject to other penalties as provided for in the Department's rules.

This scoring notice is provided by staff at this time to ensure that an Applicant has sufficient notice to exercise any appeal process provided under §11.902 of the 2020 QAP. All information in this scoring notice is further subject to modification, acceptance, and/or approval by the Department's Governing Board. If the score of an Application changes, a revised scoring notice will be provided to the Applicant.



MULTIFAMILY FINANCE PRODUCTION DIVISION
 Housing Tax Credit Program - 2020 Application Round
 Scoring Notice - Competitive Housing Tax Credit Application

Page 2 of Final Scoring Notice: 20148, High View Place

Section 1:

Score Requested by Applicant (Not including points for §11.9(c)(8) or (d)(1), (4), (5), (6) or (7) of the 2020 QAP):

128

Score Awarded by TDHCA (Not including points for §11.9(c)(8) or (d)(1), (4), (5), (6) or (7) of the 2020 QAP):

128

Difference between Requested and Awarded:

0

Section 2:

Points Awarded for §11.9(c)(8) Readiness to Proceed:

0

Points Awarded for §11.9(d)(1) Local Government Support:

17

Points Awarded for §11.9(d)(4) Quantifiable Community Participation:

4

Points Awarded for §11.9(d)(5) Community Support from State Representative:

8

Points Awarded for §11.9(d)(6) Input from Community Organizations:

4

Points Awarded for §11.9(d)(7) Concerted Revitalization Plan:

0

Section 3:

Points Deducted for §11.9(f) and/or §11.201(7)(B) of the QAP:

0

Section 4:

Final Score Awarded to Application by Department staff (Including all points):

161

Section 5:

Notes and explanation for difference between points requested and points awarded by the Department, as well as penalties assessed:

§11.9(d)(7) Concerted Revitalization Plan. The Application requested seven (7) points but is not eligible for points under this item because the application only included a HUD Comprehensive Plan and CAPER. Per §11.9(d)(7)(A)(ii), these plans do not meet the requirements. (Requested 7, Awarded 0)

Restrictions and requirements relating to the filing of an appeal can be found in §11.902 of the 2020 QAP. If you wish to appeal this scoring notice, you must file your appeal with the Department no later than 5:00 p.m. Austin local time, Tuesday, May 5, 2020. If an appeal is denied by the Executive Director, an Applicant may appeal to the Department's Board.

In an effort to increase the likelihood that Board appeals related to scoring are heard at the Board meeting, the Department has provided an Appeal Election Form for all appeals submitted to the Executive Director. In the event an appeal is denied by the Executive Director, the Applicant is able to request that the appeal automatically be added to the Board agenda.

If you have any concerns regarding potential miscalculations or errors made by the Department, please contact Sharon Gamble at (512) 936-7834 or by email at <mailto:sharon.gamble@tdhca.state.tx.us>.

Sincerely,

Sharon D. Gamble

Sharon D. Gamble
 Competitive HTC Program Administrator

Appeal Documents



MULTIFAMILY FINANCE PRODUCTION DIVISION
Housing Tax Credit Program - 2020 Application Round
Scoring Notice - Competitive Housing Tax Credit Application

Appeal Election Form: 20148, High View Place

Note: If you do not wish to appeal this notice, do not submit this form.

I am in receipt of my 2020 scoring notice and am filing a formal appeal to the Executive Director on or before Tuesday, May 5, 2020.

If my appeal is denied by the Executive Director:

I do wish to appeal to the Board of Directors and request that my application be added to the Department Board of Directors meeting agenda. My appeal documentation, which identifies my specific grounds for appeal, is attached. If no additional documentation is submitted, the appeal documentation to the Executive Director will be utilized.

I do not wish to appeal to the Board of Directors.

Signed  _____

Title Authorized Representative _____

Date 5/5/20 _____

Please email to Sharon Gamble:
<mailto:sharon.gamble@tdhca.state.tx.us>

KILLEEN HIGH VIEW, LP

May 5, 2020

Email to bobby.wilkinson@tdhca.state.tx.us

Bobby Wilkinson, Executive Director
Texas Department of Housing and Community Affairs
221 East 11th Street
Austin, TX 78701

RE: #20148; High View Place, Killeen, Bell County, Texas;
Appeal of Loss of Seven (7) Points for Concerted Revitalization Plan.

Dear Mr. Wilkinson:

We are appealing the TDHCA's Final Scoring Notice ("Notice") for High View Place (the "Project") dated April 28, 2020, in which Staff denied our claim of seven (7) points for having a qualified Concerted Revitalization Plan ("CRP") under Section 11.9(d)(7) of the 2020 Qualified Allocation Plan ("QAP"). Pursuant to the Notice, Staff decided:

§11.9(d)(7) Concerted Revitalization Plan. The Application requested seven (7) points but is not eligible for points under this item because the application only included a HUD Comprehensive Plan and CAPER. Per §11.9(d)(7)(A)(ii), these plans do not meet the requirements. (Requested 7, Awarded 0)

In reaching this decision, Staff failed to give proper consideration to Section 11.9(d)(7)(a)(ii) of the QAP:

(ii) A plan may consist of one or two, but complementary, local planning documents that together create a cohesive agenda for the plan's specific area. The plan and supporting documentation must be submitted using the CRP Application Packet. No more than two local plans may be submitted for each proposed Development. A Consolidated Plan, One-year Action Plan or any other plan prepared to meet HUD requirements will not meet the requirements under this clause, unless evidence is presented that additional efforts have been undertaken to meet the requirements in clause (iii) of this subparagraph. The concerted revitalization plan may be a Tax Increment Reinvestment Zone (TIRZ) or Tax Increment Finance (TIF) or similar plan. A city- or county-wide comprehensive plan, by itself, does not equate to a concerted revitalization plan.

The underlined language cannot be intended to mean nothing. As a result, we need to consider what constitutes "additional efforts" that must be undertaken to meet the requirements of

clause (iii) cited. In this instance, in developing its Consolidated Strategic Plan for 2015 – 2019 (the "Plan"), the City of Killeen went to the effort to identify by public comment the area within the city that most required revitalization. The area identified was the North Killeen Local Target Area, which includes the central business district, the historical area, the Stewart Neighborhood and the High View Development Site. The City used the Plan to establish an implementation plan by which problems identified by the local residents in the North Killeen Local Target Area could be mitigated. Additionally, funding was allocated for some initial infrastructure projects within the North Killeen Local Target Area. In accomplishing all of this, the City went beyond the customary consolidated plan and established the identification of problems, possible solutions and funding for the specific targeted area – in fact, documenting every requirement of clause (iii) of Section 11.9(d)(7)(a) of the QAP.

Section 11.9(d)(7)(a) sets out with particularity what is needed to show a qualifying CRP. We have copied Section 11.9(d)(7)(a)(iii) below and have provided our evidence to each necessary point of evidence:

(iii) The area targeted for revitalization must be larger than the assisted housing footprint and should be a neighborhood or small group of contiguous neighborhoods with common attributes and problems. The Application must include a copy of the plan or a link to the online plan and a description of where specific information required below can be found in the plan. The plan must meet the criteria described in subclauses (I) - (IV) of this clause:

Size of targeted area – See page 507 of the Application¹ (Page 13 of the Executive Summary of the Plan) in which the manner of collecting public suggestions of areas needing this type of redevelopment/ revitalization is described, the boundaries of the North Killeen Local Target Area (which contains downtown Killeen, Killeen's Historic area, the Stewart Neighborhood and the High View Development Site) are referenced and a map of the North Killeen Local Target Area is provided. See also page 606 of the Application (page 112 of the Plan) at which the North Killeen Local Target Area is shown on the map and the Development Site location is shown. On page 608 of the Application (page 114 of the Plan) the Plan indicates the two geographic priorities under discussion: #1 "Grantee Boundaries" which is a City-wide area; and #2 "North Killeen Target Area" which is a local target area appropriate for comprehensive revitalization. Finally, please see page 622 of the Application (page 128 of the Plan) which states that the public survey conducted provided the participants the opportunity to identify the geographical area most in need of specialized or targeted assistance, and the area now designated as the "North Killeen Local Target Area" was identified.

¹ References in this appeal to pages of the Application reference the imaged version of the Application available on the TDHCA's website as of May 1, 2020. If Staff adds or deletes any pages in the Application after that date, the page reference to the Application might no longer be correct. For that reason, a parallel page number in the Plan or other identification of the cited document is provided in most circumstances.

A complete copy of the Plan is included, beginning at page 495 of the Application. The Application also provided two links to the Plan at Page 479 of the Application.

(I) The concerted revitalization plan, or each of the local planning documents that compose the plan, must have been adopted by the municipality or county in which the Development Site is located. The resolution adopting the plan, or if development of the plan and budget were delegated, the resolution of delegation and other evidence in the form of certifications by authorized persons confirming the adoption of the plan and budget, must be submitted with the application.

The City Ordinance No. 15-034 adopting the Plan is shown at page 486 of the Application.

(II) The problems in the revitalization area must be identified through a process in which affected local residents had an opportunity to express their views on problems facing the area, and how those problems should be addressed and prioritized. Eligible problems that are appropriate for a concerted revitalization plan may include the following:

(-a-) long-term disinvestment, such as significant presence of residential and/or commercial blight, streets infrastructure neglect, and/or sidewalks in significant disrepair;

(-b-) declining quality of life for area residents, such as high levels of violent crime, property crime, gang activity, or other significant criminal matters such as the manufacture or distribution of illegal substances or overt illegal activities; or

(-c-) lack of a robust economy for that neighborhood area, or, if economic revitalization is already underway, lack of new affordable housing options for long-term residents.

The manner in which the local residents were given the opportunity to express their views on and identify the problems in the Target Area is discussed on the Plan pages identified in Section 2 of the Application Packet, included at pages 478-483 of the Application and attached as Exhibit A. The Citizen Participation Plan is provided at page 687 of the Application (page 193 of the Plan). Problems identified are set out in the table on page 613 - 622 of the Application (page 119 – 128 of the Plan and attached as Exhibit B). Note that the North Killeen Target Area is separately identified as having Priority Needs # 1, 2, 7, 8, 11, and 12. Problems are also identified in the February 25, 2020 Letter (“Letter”) from Leslie K. Hinkle, Executive Director of the Community Development Department of the City of Killeen (page 492 of the Application and attached as Exhibit C).

(III) The goals of the adopted plan must have a history of sufficient, documented and committed funding to accomplish its purposes on its established timetable. This funding must be flowing in accordance with the plan, such that the problems identified within the plan are currently being or have been sufficiently addressed.

Documented funding is cited in Section 3 of the Application Packet (Exhibit A) and is shown on page 3 of the Ordinance (note that references to Stewart Neighborhood Project shown under “Acquisitions, Public Facilities and Improvements” refer to a portion of the North Killeen Local Target Area). The table on pages 663 – 666 of the Application (169 – 172 of

the Plan) shows identified projects, funding sources and target completion dates for the North Killeen Target Area. At pages 766 – 791, the Application also includes excerpts from Consolidated Annual Performance Evaluation & Report (“CAPER”) for Years 2015 – 2018, identifying funding spent on the North Killeen Target Area (copies enclosed as Exhibit D). Links to the complete CAPERs are provided at page 765 of the Application. Additionally, on page 2 of the Letter, the funding to date for the mitigation of identified problems is shown, totaling over \$1,150,000 in completed redevelopment projects for the Target Area.

(IV) The plan must either be current at the time of Application and must officially continue for a minimum of three years thereafter OR the work to address the items in need of mitigation or rehabilitation has begun and, additionally, the Applicant must include confirmation from a public official who oversees the plan that accomplishment of those objectives is on schedule and there are no budgetary or other obstacles to accomplishing the purposes of the plan.

Page 500 of the Application has the statement “*The jurisdiction estimates the following accomplishments to be undertaken during the 2015 – 2019 Consolidated Strategic Plan (October 1, 2015 through September 30, 2020).*” When the Plan does not continue for a minimum of three years beyond submission of the Application, then it is necessary to show that work to address the items in need of mitigation has begun and that the overseeing public official confirms that the accomplishment of whose objectives is on schedule and there are no obstacles to accomplishing the purposes of the Plan. This representation is shown on page 2 of the Letter in the second full paragraph.

(iv) Up to seven (7) points will be awarded based on:

(I) A letter from the appropriate local official for the municipality (or county if the Development Site is completely outside of a municipality) providing documentation of measurable improvements within the revitalization area based on the targeted efforts outlined in the plan and in reference to the requirements of 10 TAC §11.9(d)(7)(A)(iii)(I-IV). The letter must also discuss how the improvements will lead to an appropriate area for the placement of housing (4 points); and

The Application includes the Letter from the appropriate city official at page 492. The Letter provides documentation of measurable improvements within the North Killeen Local Target Area based on the problems identified in the Plan and the funded and completed projects identified as being implemented to mitigate the problems. Additionally, at the bottom of page 2 and continuing to page 3, the Letter discusses how these ongoing and continuing efforts such as infrastructure improvements and repairs and programs to remove blighted structures and rehab existing homes will provide safety for residents of the North Killeen Local Target Area and open the Target Area to potential employment, shopping and other services, which will serve to arrest economic stagnation and aid economic development.

(II) A resolution by the municipality (or county if the Development Site is completely outside of a municipality) that explicitly identifies the proposed Development as contributing more than any other to the concerted revitalization efforts of the municipality or county (as applicable). A municipality or county may only identify one Development per CRP area during each Application Round for the additional points under this subclause, unless the concerted revitalization plan includes more than one distinct area within the city or county, in which case a resolution may be provided for each Development in its respective area. The resolution from the Governing Body of the municipality or county that approved the plan is required to be submitted in the Application. If multiple Applications submit resolutions under this subclause from the same Governing Body for the same CRP area, none of the Applications shall be eligible for the additional points, unless the resolutions address the respective and distinct areas described in the plan (2 points); and

A Resolution No. 02-007R from the City of Killeen dated February 11, 2020 is included in the Application and states at page 799 that the Development contributes more than any other to the concerted revitalization efforts of the City of Killeen.

(III) The development is in a location that would score at least five (5) points under Opportunity Index, §11.9(c)(4)(B), except for the criteria found in §11.9(c)(4)(A) and subparagraphs §11.9(c)(4) (A)(i) and §11.9(c)(4)(A)(ii). (1 point)

Finally, the Application included documentation of community assets from pages 800 – 857, documenting **34 different businesses and services** that would qualify for points under the Opportunity Index, except for inability to qualify under the poverty level restrictions of Section 11.9(c)(4)(A), and the fact that you cannot claim both Opportunity Index points and Concerted Revitalization Plan points.

Summary:

In summary, while it is true that this Application relied upon the Consolidated Strategic Plan for the City of Killeen, it also provided ample evidence ***“that additional efforts have been undertaken to meet the requirements in clause (iii) of this subparagraph.”*** The Application met every single requirement for a Concerted Revitalization Plan, including identification of a Target Area (the “North Killeen Local Target Area”) through public comment, with boundaries and a map established, problems identified, goals established, projects identified and funding identified and initiated. This degree of detail (unusual in a Comprehensive Plan) was clearly intended to implement the revitalization initiatives within the North Killeen Local Target Area without the necessity of a subsequent implementing plan, as is sometimes used by cities. The City of Killeen provided a Resolution of support that indicated that High View Place is the project that

Bobby Wilkinson, Executive Director


May 5, 2020

Page 6

contributes most to the City's concerted revitalization efforts. Finally, the Application demonstrates the existence of sufficient community assets to be awarded five (5) points, under the Opportunity Index, except for the requirements of Section 11.9(c)(4)(A).

All requirements of the CRP Selection Criteria for Urban Concerted Revitalization Plans have been met, and High View Place should be awarded the seven (7) points claimed. We respectfully request that you review the material provided in the Application and cited above and reinstate the seven (7) points claimed.

Very truly yours,

A handwritten signature in blue ink, appearing to read "A. Schuidt, Jr.", with a long horizontal flourish extending to the right.

Arthur J. Schuidt, Jr.

Authorized Representative

Attachments: Exhibits A – D

cc: Marni Holloway
Sharon Gamble
Barry Palmer

EXHIBIT A



Concerted Revitalization Plan (“CRP”) Application Packet

The purpose of the packet is to formalize the process by which Concerted Revitalization Plans (“CRP”) are described and submitted pursuant to 10 TAC §11.9(d)(7) of the Qualified Allocation Plan (“QAP”). The CRP and all supporting documentation must be uploaded to the Department’s ServU system along with this packet, as a separate document from the Application. Refer to the Multifamily Programs Procedures Manual posted at <http://www.tdhca.state.tx.us/multifamily/apply-for-funds.htm> for an explanation of the process to set-up a Serv-U Account if needed.

Application # 20148 Development Name High View

Development City Killeen Development County Bell

The Application claims no points under 10 TAC §11.9(c)(4) related to Opportunity Index.

My Development Site is located in an area that is:

Urban

Rural (skip to page 4 of the packet)

My Development Site is located in a distinct area known locally as (or named by the CRP as) North Killeen Local Target Area that is larger than the assisted housing footprint.

This packet includes a description of the area targeted for revitalization, including common attributes and problems, which can be found at (document name, page number(s), etc)

Letter from City of Killeen

5-Year Consolidated Strategic Plan (2015-2019): Pages 11-14, 112-117, 128

This packet includes a description of how this area was once vital and how it has lapsed into a condition requiring concerted revitalization, which can be found at (document name, page number(s), etc) _____.

Letter from City of Killeen

5-Year Consolidated Strategic Plan (2015-2019): Pages 12-13, 115-116

A CRP covering the area mentioned above has been developed and executed. The CRP consists of the following local planning document(s):

5-Year Consolidated Strategic Plan (2015-2019)_____

The document(s) is included in its entirety.

The document(s) can be found online at

<http://www.killeentexas.gov/297/Consolidated-Submissions---HUD-Grant-Pro>

<http://www.killeentexas.gov/DocumentCenter/View/621/2015-2019-Consolidated-Strategic-Plan-and-FY-2015-Action-Plan-PDF>

NOTE: Per the requirements of 10 TAC §11.9(d)(7)(A)(ii), a plan may consist of one or multiple, but complementary, local planning documents that together create a cohesive agenda for the plan's specific area. **No more than two (2) local plans may be submitted for each proposed Development.** A Consolidated Plan, One-year Action Plan or any other plan prepared to meet HUD requirements will not meet the requirements, unless evidence is presented that additional efforts have been undertaken to meet the requirements in the QAP. The concerted revitalization plan may be a Tax Increment Reinvestment Zone ("TIRZ") or Tax Increment Finance ("TIF) or similar plan. A city- or county-wide comprehensive plan, by itself, does not equate to a concerted revitalization plan.

The URBAN CRP meets the following criteria as required by 10 TAC §11.9(d)(7)(A)(iii)(I-IV):

1. The concerted revitalization plan, or each of the local planning documents that compose the plan, must have been adopted by the municipality or county in which the Development Site is located.
 This packet includes the resolution(s) adopting the plan or local planning documents that compose the plan;
or
 This packet includes the resolution(s) of delegation and other evidence in the form of certifications by authorized persons confirming the adoption of the plan(s) and budget(s).
2. The problems in the revitalization area must be identified through a process in which affected local residents had an opportunity to express their views on problems facing the area, and how those problems should be addressed and prioritized. A description of eligible problems for a CRP are found at 10 TAC §11.9(d)(7)(A)(iii)(II)(a) through (c).
 A description of the process for public input on the problems in the plan can be found at (document name, page number(s), etc) _____.

5-Year Consolidated Strategic Plan (2015-2019): Pages 10-14, 33, 115, 193-254

- A description of the problems identified by the process can be found at (document name, page number(s), etc) _____.

5-Year Consolidated Strategic Plan (2015-2019): Pages 11-13, 115-116

- A description of how the process determined how the problems should be addressed and prioritized can be found at (document name, page number(s), etc) _____.

5-Year Consolidated Strategic Plan (2015-2019): Pages 111, 114-115, 127

3. The goals of the adopted plan must have a history of sufficient, documented and committed funding to accomplish its purposes on its established timetable. This funding must be flowing in accordance with the plan, such that the problems identified within the plan are currently being or have been sufficiently addressed.
 A description of the goals of the plan can be found at (document name, page number(s), etc)

5-Year Consolidated Strategic Plan (2015-2019): Pages 119-128, 137-142, 157-177.

- A description of the plan's timetable can be found at (document name, page number(s), etc) _____.

5-Year Consolidated Strategic Plan (2015-2019): Pages 165-177 each goal has a target date identified.

- A description of sufficient, documented and committed funding for the plan can be found at (document name, page number(s), etc) _____, which documents at least \$_____ in funding for the plan.

The ordinance adopting the 5-year Consolidated Action Plan (submitted as part of this packet) from the City Council of Killeen designates and approves funding of \$322,000 for Stewart neighborhood Project – Phase II and \$140,700 for Stewart Neighborhood Sidewalk Reconstruction Project. As evidence in the Plan, this work is within the targeted revitalization area know as the “North Killeen Local Target Area.”

The letter from the City of Killen, addressing funding and completion of goals.

5-Year Consolidated Strategic Plan (2015-2019):

Page 131 and 154 showing CDBG Funds of \$3,756,268 and HOME Funds of \$1,014,402

Page 137-139 breakouts goals and their allocated funding

The City of Killen also publishes annual Consolidated Annual Performance Evaluation & Report "CAPER" which accounts for progress of goals and accountability of funding. Pages from the annual CAPER reports have been included to evidence funding of goals. The pages are listed in the response to the next question below.

Evidence that the funding has been flowing to address the problems identified in the plan, or that the problems have been sufficiently addressed, can be found at (document name, page number(s), etc) _____.

The City of Killen also publishes annual Consolidated Annual Performance Evaluation & Report "CAPER" which accounts for progress of goals and accountability of funding. Pages from the annual CAPER reports have been included to evidence funding of goals. These annual reports show a history of funding flowing to address the problems successful implementation of goals to address problems.

Exhibit I Funding and Goal Accomplishment

2015 CAPER Pages out of a 117 page document: 10, 13, 14, 24, 57, 58, 117

2016 CAPER Pages out of a 47 page document: 4, 12, 21, 23, 46

2017 CAPER Pages out of a 31 page document: 3, 10, 11

2018 CAPER Pages out of an 88 page document: 3, 10, 11, 42, 43, 73, 78

4. The plan must either be current at the time of Application and must officially continue for a minimum of three years thereafter OR the work to address the items in need of mitigation or rehabilitation has begun and, additionally, the Applicant must include confirmation from a public official who oversees the plan that accomplishment of those objectives is on schedule and there are no budgetary or other obstacles to accomplishing the purposes of the plan.

The plan is current at the time of Application, and the effective period for the plan is October 1, 2015 – September 30, 2020 and can be found at (document name, page number(s), etc) 5-Year Consolidated Strategic Plan (2015-2019): Page 6.

; or

Evidence that the work to address problems in the plan has begun can be found at (document name, page number(s), etc) _____; AND.

The letter from the City of Killen, addressing funding and completion of goals.

Exhibit I Funding and Goal Accomplishment

2015 CAPER Pages out of a 117 page document: 10, 13, 14, 24, 57, 58, 117

2016 CAPER Pages out of a 47 page document: 4, 12, 21, 23, 46

2017 CAPER Pages out of a 31 page document: 3, 10, 11

2018 CAPER Pages out of an 88 page document: 3, 10, 11, 42, 43, 73, 78

Confirmation from a public official that accomplishment of those objectives is on schedule and there are no budgetary or other obstacles can be found at (document name, page number(s), etc) _____.

Letter from the City of Killeen

Provide any comments or additional information in the box below, if applicable.

URBAN CRP Requested Scoring. Points may be selected under 1, 2, and 3 below for no more than a total of 7 points.

1. Applications will receive four (4) points for a letter from the appropriate local official providing documentation of measurable improvements within the revitalization area based on the targeted efforts outlined in the plan and in reference to the requirements of 10 TAC §11.9(d)(7)(A)(iii)(I-IV). The letter must also discuss how the improvements will lead to an appropriate area for the placement of housing.

A letter from a public official is included in this packet (an adopted resolution may be submitted in place of a letter).

2. Applications may receive (2) points in addition to those above if the Development is explicitly identified in a resolution by the municipality or county as contributing more than any other to the concerted revitalization efforts of the municipality or county (as applicable).

An adopted resolution from the city of Killeen is included in this packet (a letter MAY NOT be submitted in place of a resolution).

An adopted resolution from _____ county is included in this packet (a letter MAY NOT be submitted in place of a resolution).

NOTE: A municipality or county may only identify one Development per CRP area during each Application Round for the additional points under this subclause, unless the concerted revitalization plan includes more than one distinct area within the city or county, in which case a resolution may be provided for each Development in its respective area. The resolution from the Governing Body of the municipality or county that approved the plan is required to be submitted in the Application. If multiple Applications submit resolutions under this subclause from the same Governing Body for the same CRP area, none

of the Applications shall be eligible for the additional points, unless the resolutions address the respective and distinct areas described in the plan.

3. Applications will receive (1) point in addition to those under 1. and 2. above if the development is in a location that would score at least 4 points under Opportunity Index, §11.9(c)(4)(B), except for the criteria found in §11.9(c)(4)(A) and subparagraphs §11.9(c)(4)(A)(i) and §11.9(c)(4)(A)(ii).

Development Site is within the required radius of the eligible amenities and/or services listed below, pursuant to §11.9(c)(4)(B)(i) of the QAP.

A map showing the Development Site, location of and distance to the amenities, and evidence that the amenity meets all requirements of the rule, as applicable, is included.

Bus Stop	Grocery Store
Pharmacy	Health Related Facility
Child Care	Library
College and University	Indoor Recreation
Outdoor Recreation	Community, Civic, Service Organizations
Meals on Wheels	Schools with a Rating of B or higher

Provide any comments or additional information in the box below, if applicable.

EXHIBIT B

Description of process that determined how problems should be addressed and prioritized.

Summary of Goals

SP-25 Priority Needs - 91.215(a)(2)

Priority Needs

Table 48 – Priority Needs Summary

1	Priority Need Name	Housing- Rehabilitation of Existing Owner Units
	Priority Level	High
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly
	Geographic Areas Affected	City Wide North Killeen Target Area
	Associated Goals	Rehabilitation of Existing Units - DH1; DH2;
	Description	Funding for rehabilitation of existing owner occupied housing units to include accessibility modifications and reduction/abatement of lead based paint hazards; reconstruction and urgent repair single family structures.
	Basis for Relative Priority	Killeen Community Survey 2015; Housing Problems data; Cost Burden data
2	Priority Need Name	Housing - Rehabilitation to Existing Rental Units
	Priority Level	High
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly
	Geographic Areas Affected	City Wide North Killeen Target Area

	Associated Goals	Rehabilitation of Existing Units - DH1; DH2;
	Description	Funding for rehabilitation to existing rental housing units to include accessibility modifications and reduction/abatement of lead based paint hazards; reconstruction of rental units constructed prior to 1980
	Basis for Relative Priority	Killeen Community survey, Housing Problems data, Cost burdened data
3	Priority Need Name	Housing - Acquisition Assistance Homebuyers
	Priority Level	High
	Population	Moderate Large Families Families with Children Elderly
	Geographic Areas Affected	City Wide
	Associated Goals	Acquisition Assistance - Homebuyers- DH2; DH3
	Description	Funding for down payment, closing cost, and gap financing to first time homebuyers
	Basis for Relative Priority	Killeen Community Survey, 2007-2011 ACS statistical data ownership/renters
4	Priority Need Name	Housing - Rental Assistance (tenant based)
	Priority Level	High

	Population	Extremely Low Low Large Families Families with Children Elderly Individuals Families with Children veterans Victims of Domestic Violence Elderly Victims of Domestic Violence
	Geographic Areas Affected	City Wide
	Associated Goals	Rental Assistance (tenant based) DH2
	Description	Funds to provide monthly subsidy to renter households until such time the Housing Choice Voucher (Section 8 rental assistance) is available. Subsidy includes deposit not to exceed 2 times the monthly rental amount. Rent reasonableness for comparable units throughout the jurisdiction.
	Basis for Relative Priority	Killeen Community survey, Cost burdened data; Voucher access is closed with no additions to wait list, voucher availability per wait-list exceeds 24 months from both Housing Choice Voucher administrators- Housing Authority of Killeen and Central Texas Council of Government-Housing Assistance Program.
5	Priority Need Name	Housing - Increase Supportive Housing
	Priority Level	Low
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions

	Geographic Areas Affected	City Wide
	Associated Goals	Increase Supportive Housing DH1; DH3
	Description	Funding for acquisition of units, renovation, or retrofitted to meet the housing and supportive services necessary for special needs households and families.
	Basis for Relative Priority	Killeen Community Survey 2015
6	Priority Need Name	Housing - Suitable Housing
	Priority Level	Low
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Victims of Domestic Violence Unaccompanied Youth
	Geographic Areas Affected	City Wide
	Associated Goals	Suitable Housing DH1; DH2
	Description	Funding for appropriate housing including housing and shelter for homeless persons, chronic homeless persons, transitional housing, permanent housing, and other monthly housing subsidies including rehabilitation, reconstruction, new construction with appropriate justification.

	Basis for Relative Priority	Killeen Community Survey 2015
7	Priority Need Name	Public Infrastructure and Improvements
	Priority Level	High
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Non-housing Community Development
	Geographic Areas Affected	North Killeen Target Area
	Associated Goals	Public Infrastructure and Improvements SL3
	Description	Funding for publicly owned streets, curbs, sidewalks, sanitary sewer, water, solid waste disposal to sustain aging infrastructure in target areas of the city; includes rehabilitation, reconstruction, new construction with appropriate justification.
	Basis for Relative Priority	Killeen Community Survey 2015 regarding areas in need of revitalization; HUD CPD Mapping Tool and 2007-20011 ACS data regarding areas with high concentrations of low-income households..
	8	Priority Need Name
Priority Level		High

	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Victims of Domestic Violence Non-housing Community Development
	Geographic Areas Affected	City Wide North Killeen Target Area
	Associated Goals	Public Facilities Impvmts -Public/NPOs SL1, SL2
	Description	Funding for public facilities/neighborhood facilities publicly owned or owned by a nonprofit that are open to the general public that serve primarily low and moderate-income households to include schools, libraries recreational facilities, parks, playgrounds, facilities for persons with special needs (homeless, domestic violence shelters, nursing homes, group homes for disabled persons, and other eligible facilities); rehabilitation, reconstruction, new construction in target areas and other areas with appropriate justification.
	Basis for Relative Priority	Killeen Comunity Survey 2015
9	Priority Need Name	Public Services/Programs
	Priority Level	High

	Population	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Public Housing Residents Non-housing Community Development
	Geographic Areas Affected	City Wide
	Associated Goals	Public Services/Programs SL1; SL3
	Description	Funding for services and programs providing access to quality public and private services with resources that benefit low and moderate income persons and families including child care, homeless services (operations), health care, job training and employment services (job search, resume writing), recreation programs, education programs, public safety services, senior and elderly services, homeless services, counseling/mentoring and mental health programs and services, children services, battered/abused persons and children services, services for disabled/handicap persons, transportation services, crime awareness/crime prevention services, substance abuse services, fair housing education services, screening for lead based paint services, legal/planning services
	Basis for Relative Priority	Killeen Community Survey 2015
10	Priority Need Name	Economic Development
	Priority Level	High
	Population	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Public Housing Residents Non-housing Community Development

	Geographic Areas Affected	City Wide
	Associated Goals	Economic Development EO3
	Description	Funding for job creation and retention for low-moderate income persons; establishment/stabilization and expansion of small businesses (including microbusinesses); Commercial and industrial improvements carried out by the City or a nonprofit subrecipient; Assistance to private for-profit entity for an activity associated with an approved economic development project including financial and technical assistance and other eligible projects.
	Basis for Relative Priority	Killeen Community Survey 2015
11	Priority Need Name	Economic Development/Preservation
	Priority Level	Low
	Population	Extremely Low Low Moderate Middle Non-housing Community Development
	Geographic Areas Affected	City Wide North Killeen Target Area
	Associated Goals	Economic Development / Preservation EO3
	Description	Funding for economic development activities associated with preservation of existing structures, increasing the number of jobs for low and moderate-income households including rehabilitation, reconstruction, preservation of commercial/industrial structures with historic significance registered on a federal, state, or local preservation listing.
	Basis for Relative Priority	Killeen Community Survey 2015
12	Priority Need Name	Planning and Administration

Description of process that determined how problems should be addressed and prioritized.

Priority Level	Low
Population	Other
Geographic Areas Affected	City Wide North Killeen Target Area
Associated Goals	Planning and Administration
Description	Funding for planning and administration of HUD funded grant programs to include operations, benefits, salaries, and other eligible deliverables for each year of the Consolidated Plan.
Basis for Relative Priority	HUD regulations require regular planning, administration, monitoring, and reporting by grantee jurisdictions in association with receipt of the formula grant programs.

Narrative (Optional)

Community Planning meetings along with the Killeen Community Survey 2015-Voice Your Choice Killeen! is the primary source for determining priority levels of the broad categories and subcategories of eligible activities under the two HUD programs. Participants ranking each broad category and subcategory; combined results are as follows: Housing: High – Home Repair – Owners, Homebuyer Assistance, Homeless Shelters, Owner Accessibility for Disabled Persons; Public Housing; Renter Accessibility for Disabled Persons, Section-8/Rental Assistance, and Transitional Housing. Low – Home Repair Renters, Mortgage Assistance, New Construction ownership units, and New Construction rental units. Special Needs Populations: High – Persons with Mental Illness/Developmentally Disabled persons, Disabled Veterans, Ex-Offenders/Inmates Re-entering Society, Frail Elderly (over age 75), Homeless persons/At-risk of Homelessness, Other households moving from transitional housing to permanent housing, Persons with HIV/AIDS and their families, Persons with Alcohol/Drug Addiction, Physically Disabled persons, Seniors/Elderly (over age 65), Unaccompanied Youth (up to age 25), Victims of Domestic Violence, and Youth exiting foster care – age 18 and under. Public Services: High – Abused/Neglected Children, Battered/Abused Spouses, Crime Awareness/Crime Prevention, Disabled/Handicapped, Employment/Job Training, Health Services, Homeless Services, Mental Health Services, Seniors/Elderly, Substance Abuse, Transportation, and Youth. Low –Employment-resume writing/job search, Fair Housing education services, Legal/Planning services, and Screening for Lead Based Paint poisoning. Public Facilities/Public Improvements: High – Abused/Neglected Children facilities, Child Care Centers, Domestic Violence facilities, Health/Clinic facilities, Sidewalk Improvements, Solid Waste Disposal Improvements, Special Needs facilities, Street Improvements, Water/Sewer Improvements, and Youth Centers. Low –Flood/Drainage Improvements, Parking facilities, Parks, Playgrounds, Recreation facilities, Sidewalk Improvements, and Solid Waste Disposal Improvements. Non-Housing Community Development: High – Acquisition of real property(for use in housing or a facility), Assistance to Institutes

of Higher Education, Clearance and Demolition (of unsafe structures), Code Enforcement (administration only), Economic Development-financial/technical assistance, Fair Housing Activities, Public Information (assoc. with programs, services, activities receiving federal funds), and Relocation Assistance (assoc. with a CDBG or HOME project). Low –Commercial/Industrial Improvements, Historic Preservation (residential or commercial) and Micro-Enterprise assistance.

The survey afforded participants the opportunity to identify geographical area(s) of the community in need of specialized or targeted assistance. The local target area of North Killeen now known as the North Killeen Target Area was identified and is bound on the west by Highway 195 (Fort Hood Street), on the north by the city limits to Fort Hood boundary, east by W.S. Young Drive, and on the south by Highway 190 (Central Texas Expressway).

How the Revitalization geographical area was determined.

EXHIBIT C



Community Development Department

February 25, 2020

Art Schuldt
Housing Solutions Alliance, LLC
1935 Airline Drive, #200
Bossier City, LA 71112

**RE: Concerted Revitalization Plan (CRP) Implementation
High View, TDHCA# 20148**

Dear Mr. Schuldt,

The City of Killeen is excited about your development team's proposal to rehabilitate High View apartments. Your project will help implement the City of Killeen's adopted Community Development Department's 5-Year Consolidated Strategic Plan (2015-2019). **This plan is current and runs through September 2020.** The plan represents a determined commitment by the City of Killeen to revitalize lower income Killeen neighborhoods. **The City of Killeen identified in the Consolidated Strategic Plan a large and small target area named the North Killeen Target Area.** The two target areas include activities to enhance and revitalize residential and commercial properties, public improvements and public facilities that increase and expand opportunities to existing and new residents and businesses within the identified local target area. **High View is located within the large local targeted area of the City's revitalization plan designated the North Killeen Local Target Area. This area was once vital to the City of Killeen and has lapsed into a condition requiring concerted revitalization.** The North Killeen Local Target Area is the portion of Killeen which contains downtown Killeen, Killeen's Historic area, and was once the heart of Killeen's commerce, housing, and recreation. Over the years as Killeen has grown towards the south, the once vital targeted area has seen the need for further revitalization. The rehabilitation of High View will greatly contribute to the revitalization efforts in the North Killeen Local Target Area as described in the Community Development's 5-year Consolidated Strategic Plan (2015-2019).

The City of Killeen relied on needs assessment from third parties like Texas A&M University - Central Texas, public meeting, community outreach, and online surveys soliciting citizen participation in developing a process to identify problems, target areas for revitalization, and prioritization of goals in adopting the 5-Year Consolidated

Strategic Plan. The problems identified in the North Killeen Local Target Area through this process include the need for:

- Infrastructure investment relating to streets, lighting, community facilities, and public parks
- Housing needs including homeless shelters, housing for the elderly, and accessibility [architectural barrier removal] for disabled persons
- Need of facilities for delivering community services
- Economic Development

The work to address the items in need of mitigation is well underway. To date, the following projects have been completed in the large North Killeen Local Target Area:

- Stewart Neighborhood Project. Funding \$57,459
- Stewart Neighborhood Project Phase 2: including improvements to Stewart Park, and sidewalk and drive section replacements. Funding \$292,564
- Families in Crisis completed renovation to a commercial structure and opened an over-night homeless shelter known as Friends in Crisis. Funding \$510,564.
- Stewart Neighborhood Project Phase 3: including residential street and sidewalk improvements, installation of an environmental educational walking trail.
- Stewart Neighborhood Project Phase 4: sidewalk reconstruction. Funding \$298,515

As demonstrated by these completed improvement projects in the large North Killeen Local Target Area, the goals of the Consolidated Strategic Plan have a history of sufficient, documented and committed funding on established timelines, and that the objectives of the plan are currently or have been sufficiently addressed, evidencing a lack of budgetary or other obstacles. The City of Killeen will continue caring out the goals of Consolidated Strategic Plan through 2020 and beyond.

These projects have brought marked and measurable improvement to the large North Killeen Local Target Area including:

- Improved road and sidewalk infrastructure
- Increased resident safety
- Increased accessibility
- Repurposing of older commercial buildings
- Improvement to public parks
- Addressing housing needs such a homelessness.

The ongoing and continuing efforts to bring revitalization to this area will aid in creating an appropriate area for the placement of housing. The infrastructure work such as street, road, park improvements and public lighting repair will increase the overall

Page 3

safety for residents who reside in the targeted area. The housing programs to remove blighted structures and rehab existing homes will aid in transformation of the area for continued housing improvement. Additionally, these improvements are opening targeted neighborhoods with gateways to potential employment, shopping, and other services. This will aid in arresting the economic stagnation by opening pathways for economic revitalization to enter the area.

The City of Killeen passed a resolution on February 11, 2020 identifying High View as the development contribution more than any other to our revitalization efforts.

Should you have any questions, please do not hesitate to contact me at 254-501-7847.

Sincerely,



Leslie K. Hinkle
Executive Director of Community Development

LH

EXHIBIT D



Year 1 - 2015-2019 Consolidated Strategic Plan

**Consolidated Annual
Performance Evaluation &
Report**

2015

FINAL

December

2016

HUD FOA 2/ 2017

Community Development Department

Assess how the jurisdiction's use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan, giving special attention to the highest priority activities identified.

Overall annual objectives for both CDBG and HOME programs were on target as well as cumulative for the first year goals. Public Service programs assisted more persons than estimated, which is likely due in part to the stagnant economy. Housing projects were completed during the fiscal year with results slightly higher for assisting first time homebuyers and 2.5 times higher than anticipated for housing rehabilitation. The Public Facilities Improvements project from previous fiscal year FY2013-Families in Crisis Homeless Shelter Renovation was completed in the first quarter of the report year and began serving persons experiencing homelessness, on December 23, 2015; results to the end of the fiscal report year total 753 homeless persons provided overnight shelter.

The Public Improvements project, FY2014-Stewart Neighborhood Project, continued through the fiscal year suffering from delays associated with unacceptable work and contract termination of the prime contractor, with an end result of City crews completing those identified areas of unacceptable work - with labor and material costs absorbed by the Transportation Department. The Transportation/Street Services crews completed fabrication of railing for the walking areas and bridges over Stewart ditch at Culp Avenue and Gray Drive associated with the FY2014 Stewart Neighborhood Project. **Work continued in the Stewart Neighborhood, located in the North Killeen target area, with additional sidewalk and drive section replacements along with park improvements with funds from the FY2015 Stewart Neighborhood Project Phase 2-Stewart Park.** Public Service programs - one of the higher priorities within the jurisdiction - provided low-income persons with services in excess of what was anticipated by both the human service agencies as well as the City. Homeowner housing rehabilitation, another high priority for the jurisdiction, also saw an unexpected increase above what was expected. In both of these high priority categories, extremely low-income persons (public services) and low income households (housing rehabilitation) were those benefitting and having the greatest need.

History of funds flowing to identified problems and problems being addressed in the North Killeen target area: Stewart Neighborhood. page 10 of 117 from 2015 CAPER

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG		3,756,268	360,688
HOME		1,014,402	139,441

Table 3 - Resources Made Available

Narrative

Resources made available during the reporting period include the jurisdiction's CDBG and HOME program funds as listed above in the column identified as "amount expended during the program year 2015". In addition, the human service agencies combined additional public and private funds with the HUD (federal) funds to complete the public service programs. The additional funding sources are as follows: State of Texas-Workforce Commission, Bell County, Texas Veterans Commission, Fund for Veterans Assistance, Texas Department of State Health Services, United Way of the Greater Fort Hood Area, Killeen Independent School District, City of Harker Heights, Seyton Hospital, Metroplex Hospital, Scott & White Hospital, Episcopal Health Foundation, Caring Hearts, Killeen Lions Foundation, Fort Hood Officers Spouses Club, Texas Department of Aging and Disability Services, Central Texas Council of Governments, Texas Community Services Block Grant, Superior Health Care, United Health Care, Meadows Foundation, Killeen Rotary Club, City of Killeen General Fund and other individual donors and contributors to the local non-profit organizations. These additional sources provided over \$1,605,785.00 to aide in the delivery of human and public service programs and facilities improvements under the jurisdiction's CDBG program.

Under the HOME program, the jurisdiction expended entitlement funds totaling \$338,413.87 with \$89,132.51 on First Time Homebuyers with Repairs(rehab) program and \$249,281.36 on the TBRA activities through it's subrecipient-Families in Crisis. The TBRA activities expenditures charged are #923/\$59,480.31 - 7 new households /3 ongoing from previous year, #974/\$86,863.92 - 17 new households / 9 ongoing from previous year, and #1009/\$102,937.13 - 3 new households / 1 ongoing from previous year.

The City of Killeen general fund provided additional funding to cover the cost of administration for both CDBG and the HOME programs totaling \$146,324.80 (\$127,116.91- CDBG, \$19,207.89-HOME).

See Attachment 2 for the PR03 CDBG Activity Summary Report

See Attachment 3 for the PR23 CDBG and HOME Summary of Accomplishments Reports

See Attachment 5 for the PR26 CDBG Financial Summary and Adjustment to CDBG Financial Summary.

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
Grantee Boundaries		33	City Wide
Grantee Boundaries	32	33	City Wide
North Killeen Target Area	16	67	
North Killeen Target Area	67	67	

Table 4 – Identify the geographic distribution and location of investments

Narrative

The City and its subrecipients carried out projects in areas designated as low-income within the city, as identified in updates from the 2005-2009 American Community Survey (ACS) data. Although no specific area distribution is required [in the consideration when making allocations to projects], priority is given to those projects that intend to serve priority populations- for public services, and areas within the city that have higher concentrations of minority and low-income households for public and facilities improvements. the planned percentage distribution, based upon the two areas identified above - Grantee Boundaries and North Killeen Target Area, are consistent with the expected results; difference is likely due to rounding of figures. HOME Program funds are distributed throughout the jurisdiction's (grantee) boundaries so as not to steer persons or households to specific neighborhoods or areas.

CDBG funds used for public facilities and public improvements continue to be targeted toward concentrated areas of low-income persons and households which are usually more expensive and funding is not restricted to a percentage of the annual grant - like the maximum percentage applied to public service programs serving low-income households throughout the jurisdiction's (grantee) boundaries. The FY 2014 public facility activity - Stewart Neighborhood Project, continued improvements to the residential streets and sidewalks, and the neighborhood park under FY2015 Stewart Neighborhood Phase 2- Stewart Park. The FY15 Stewart Neighborhood Sidewalks Reconstruction project got a late start, however at the time of this report the activity is under way and near completion of additional sidewalks that serve the Stewart Neighborhood linking the residential neighborhood and nearby Eastward Elementary School. At the time of this report, the FY2014 and FY2015 projects are yet to be completed, but it is expected that approximately 3,900 low and moderate income households will benefit - improving the living environment and sustaining existing residential Stewart Neighborhood.

CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)
Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through:

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

The jurisdiction continues to work with community based non-profit organizations who direct their services to persons currently homeless and to persons and households that may become homeless. The actions taken are those established by local human service agencies and are recipients of the jurisdiction's HUD funding.

Homelessness and persons/families in the community. The jurisdiction's Homeless programs that are directed to identification of homeless persons and assessing the welfare needs. Local human service agencies also work closely to refer individuals with other and then aiding in re-establishing the individual/household within the community.

Friends In Crisis Shelter is in the North Killeen Target Area-- confirmed in letter from the City.

The jurisdiction continues to support agencies applying for other program funding through the State Emergency Solutions Grant (ESG) or HUD funding through the Continuum of Care (COC) Balance of State (BOS) and the Texas Homeless Network (THN).

Addressing the emergency shelter and transitional housing needs of homeless persons

In December 2015 - Families in Crisis completed renovations to a commercial structure and opened the over-night homeless shelter known as Friends in Crisis. The FY2014 CDBG funded facility improvement serves all homeless persons and provides health assessments through a collaborative effort with the Greater Killeen Free Clinic. Other state and local human service agencies provide access to programs for veterans, housing, and testing for communicable diseases. The shelter provided overnight shelter to over 700 persons between December 23, 2015 and September 30, 2016; more than double of previous year's Point In Time counts of homeless/sheltered persons for the Bell and Coryell County areas. Families in Crisis also operates one transitional housing unit previously funded by CDBG and Central Texas Youth Services operates 6 transitional housing units for youth/young adults aging out of foster care; both entities are successful in their efforts in meeting the needs of homeless persons.

Heritage House of Central Texas (HHCT) continues to work closely with individuals who are willing to participate in the Empowerment Program--designed to aid in re-establishing self-sufficiency without relying on government subsidy. HHCT staff work closely with local property owners and managers in establishing rental units for clients taking the route of non-federal assistance. the partnerships in the rental housing afford homeless persons the opportunity to establish themselves with reduced expenses while participating in an individually detailed success plan...empowering the individual to make key



U.S. Department of Housing and Urban Development
 Office of Community Planning and Development
 Integrated Disbursement and Information System
 CDBG Activity Summary Report (GPR) for Program Year 2015
 KILLEEN

Date: 22-Dec-2016
 Time: 10:03
 Page: 16

page 57 of 117 from 2015
 CAPER

PGM Year: 2015
Project: 0003 - Stewart Neighborhood-Phase II
IDIS Activity: 1013 - STEWART NEIGHBORHOOD-Phase II
Status: Open
Location: Stewart Street Killeen, TX 76541

Objective: Create suitable living environments
Outcome: Availability/accessibility
Matrix Code: Parks, Recreational Facilities (03F)

National Objective: LMA

Initial Funding Date: 12/10/2015

Description:
 CDBG funds will be used for the rehabilitation of the existing park and playground equipment, resurfacing of the sport courts and replacing of landscaping and irrigation.
Financing

	Fund Type	Grant Year	Grant	Funded Amount	Drawn In Program Year	Drawn Thru Program Year
CDBG	EN	2015	B15MC480020	\$320,399.89	\$57,459.40	\$57,459.40
	PI			\$1,600.11	\$0.00	\$0.00
Total	Total			\$322,000.00	\$57,459.40	\$57,459.40

Proposed Accomplishments

Public Facilities : 1
 Total Population in Service Area: 935
 Census Tract Percent Low / Mod: 59.89

Annual Accomplishments	Accomplishment Narrative	# Benefiting
2015	3rd Qtr - project awarded and pre-construction meeting conducted. Notice to Proceed (NTP) issued and waiting on material order to arrive for installation. City staff prepared the park site by removing existing equipment waiting for new playground and basketball court equipment to be installed. 2nd Qtr - all bid documents prepared and released for sealed bid proposals - 147 pages defining the scope of work and conditions to complete the project. Ads appeared March 22 and 27, 2016 with Bids due April 1, 2016. Estimated cost for this portion of project is \$297,000. 1st Qtr - Community Development and Parks and Recreation staff worked together compiling information and necessary requirements in the development of a bid packet; City Legal Dept reviewed language associated with bid documents; bid number requested from Purchasing Dept and advertising bid notice schedule completed. Product and playground layout change resulted in a revision to bid specifications with anticipated bid advertisement in the second quarter (after January 2016).	



PGM Year: 2015
Project: 0004 - Stewart Neighborhood Sidewalks Reconstruction
IDIS Activity: 1014 - STREET DEPT. -Stewart Neighborhood Sidewalk Reconstruction
Status: Open
Location: 1307 Culp Ave. Killeen, TX 76541
Objective: Create suitable living environments
Outcome: Availability/accessibility
Matrix Code: Sidewalks (03L)
National Objective: LMA

Initial Funding Date: 12/11/2015
Description: CDBG funds will be used to replace existing deteriorated sidewalks within one quarter (.25) mile radius of Stewart Neighborhood Park.
Financing

	Fund Type	Grant Year	Grant	Funded Amount	Drawn In Program Year	Drawn Thru Program Year
CDBG	EN	2015	B15MC480020	\$140,700.00	\$374.10	\$374.10
Total	Total			\$140,700.00	\$374.10	\$374.10

Proposed Accomplishments
 People (General) : 1
 Total Population in Service Area: 935
 Census Tract Percent Low / Mod: 59.89

Annual Accomplishments

Years	Accomplishment Narrative	# Benefiting
2015	4th Qtr- Bid award schedule pushed to mid-August; Bonds and Insurance requested from Contractor with pre-construction conference scheduled. Notice to Proceed effective October 3, 2016 with completion expected by March 2017. 3rd Qtr - project bid and opened June 10. Expect City Council to award contract the first half of August with Notice to Proceed anticipated for the first week of September. 2nd Qtr - changes in material requirements and weather caused delay in bid release; advertisement is rescheduled for May 23, 2016 with bid opening scheduled for June 10 and award on July 12. 1st Qtr - Project specifications developed and approved, begin preparation of bid documents. Anticipate bid release mid-late February 2016.	

Adjusted CDBG Budget Amount: \$1,437,242.28

2015 CDBG Admin	\$ 186,549.00
2015 Housing Rehabilitation	\$ 170,695.00
2015 Stewart Neighborhood Project P&R	\$ 322,000.00
2015 Stewart Neighborhood Project Streets	\$ 140,700.00
2015 Bell County Human Svs	\$ 5,000.00
2015 BEITZ	\$ 8,000.00
2015 Community In Schools	\$ 22,000.00
2015 Families in Crisis, Inc.	\$ 6,000.00
2015 Greater Killeen Free Clinic	\$ 23,911.75
2015 Heritage House of Central TX	\$ 5,000.00
2015 Hill Country Comm. Action	\$ 10,000.00
2015 Elderly Transportation Program	\$ 60,000.00
2014 Stewart Neighborhood Improvements	\$ 249,185.18
2014 Housing Rehabilitation	\$ 57,500.04
2013 FIC/Homeless Shelter	\$ 170,701.31
	\$ 1,437,242.28

Unprogrammed Balance: \$40,281.27

2015 Central TX 4C, cancelled project	\$ 21,912.30
2014 CDBG Admin	\$ 24.07
2014 Heritage House of Central TX	\$ 125.00
2014 Program Income Receipted	\$ 7,358.16
2015 Program Income Receipted	\$ 10,829.10
Cash on Hand at the end of reporting	\$ 32.64
	\$ 40,281.27

NO ADJUSTMENTS MADE TO FY 2015 FINANCIAL SUMMARY REPORT



Year 2 - 2015-2019 Consolidated Strategic Plan

**Consolidated Annual
Performance Evaluation &
Report**

FY 2016

DRAFT

**November
2017**

Community Development Department

CR-05 - Goals and Outcomes

Progress the jurisdiction has made in carrying out its strategic plan and its action plan.
91.520(a)

This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.

This report covers the period beginning October 1, 2016 and ends September 30, 2017.

Public Service programs assisted 16% more persons than estimated (2997 vs. 3572). Two (2) Housing (rehabilitation) projects were completed during the fiscal year with total program results significantly less than estimated. **Public Infrastructure and Improvements were completed for the Killeen Stewart Neighborhood Phase 3 walking trail and sidewalk reconstruction project. These improvements help sustain the existing housing and neighborhood while increasing connectivity to the nearby Eastward Elementary School, local store and the overall neighborhood. The increased lighting at the Stewart Neighborhood walking trail helps provide additional security to the neighborhood.** One Public Facilities Improvements-Public/NPOs was not completed during the report year with the Girl Scouts of Central Texas Killeen Service Center project when the project bid came in at more than twice the available project budget; Sept. 11, 2017 the GSCTX decided to relinquish the allocation of CDBG funds. Other underlying circumstances of Hurricane Harvey may not have benefitted amounts bid due to history of material costs from the hurricanes of 2008 – namely Katrina. **Remaining projects from FY 2015 were completed during the program year which includes the Stewart Neighborhood Sidewalk Reconstruction project which concluded with final work being completed in the first quarter and later in the early part of the 2nd quarter (November 2016- February 2017).**

HOME program funded housing activities included 6 (six) First Time Homebuyer Assistance with repairs (rehabilitation) to the unit and Tenant Based Rental Assistance (TBRA) for target populations: elderly and victims of domestic violence/sexual assault and veterans (special TBRA). The total homebuyers are less than initially anticipated – the jurisdiction was without a HOME Program Coordinator for the latter part of the April through September 2017. The vacant position is primarily the cause of the decrease in adding first time homebuyers. The Con Plan Goals and Accomplishments Report (CPGA Report) has the actual number of household buyers assisted for the program report year for FY2016 listed under “Homeowner Housing Added” which should be aggregating to “Direct Financial Assistance to Homebuyers”. Additionally, first time buyer housing units received rehabilitation (repairs) actions which the CPGA Report is not counting the households since the rehab actions are being reported under the Acquisition Assistance-Homebuyers activity number. TBRA activities from previous year funding continued to assist eligible households throughout the report year with ongoing rental assistance provided to 19 households (FY13 & 14 HOME TBRA) and an additional 20 new households began receiving the monthly subsidy under the FY2015 HOME funded TBRA program. The jurisdiction will continue to work on aligning the annual projects with the ConPlan goals list to better aggregate the information in the IDIS report system.

Narrative

The City and its subrecipients carried out projects in areas designated as low-income within the city, as identified in updates from the 2007-2011 American Community Survey (ACS) data. Although no specific area distribution is required [in the consideration when making allocations to projects], priority is given to those projects that intend to serve priority populations- for public services, and areas within the city that have higher concentrations of minority and low-income households for public and facilities improvements. The planned percentage distribution, based upon the areas identified above - Grantee Boundaries and North Killeen Target Area, are consistent with the expected results; difference is likely due to rounding of figures. HOME Program funds are distributed throughout the jurisdiction's (grantee) boundaries so as not to steer persons or households to specific neighborhoods or areas.

CDBG funds used for public facilities and public improvements continue to be targeted toward concentrated areas of low-income persons and households which are usually more expensive and funding is not restricted to a percentage of the annual grant - like the maximum percentage applied to public service programs serving low-income households throughout the jurisdiction's (grantee) boundaries. **The FY 2016 public facility activity-Stewart Neighborhood Project Phase 3 continued improvements to the residential streets and sidewalks, and installed an environmental educational walking trail adjacent to Stewart Street along Stewart Ditch. Previous phases of improvements to the Stewart Neighborhood were completed in the latter part of the first quarter – concluding in the second quarter of the fiscal year. The park, walking trail and sidewalks that serve the Stewart Neighborhood link the residents of the neighborhood to nearby Eastward Elementary School ultimately improving the living environment and sustain the existing Stewart Neighborhood for approximately 3,900 low and moderate income households.**

CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)

Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through:

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

The jurisdiction continues to work with community based non-profit organizations who direct their services to persons currently homeless and to persons and households that may become homeless. The actions taken are those established by local human service agencies and are recipients of the jurisdiction's HUD funding.

Homelessness and persons/families at-risk of becoming homeless remains a high priority within the community. The jurisdiction's HUD funds provide for programs that are directed to identification of homeless persons and assessing their individual health and welfare needs. Local human service agencies also work closely to refer individuals for services among each other and then aiding in re-establishing the individual/household within the community.

The jurisdiction continues to support agencies applying for other program funding through the State Emergency Solutions Grant (ESG) or HUD funding through the Continuum of Care (COC) Balance of State (BOS) and the Texas Homeless Network (THN).

Addressing the emergency shelter and transitional housing needs of homeless persons

Addressing the emergency shelter and transitional housing needs of homeless persons

In December 2015 - Families in Crisis opened the over-night homeless shelter known as Friends in Crisis. The FY2014 CDBG funded facility improvement serves all homeless persons and provides health assessments through a collaborative effort with the Greater Killeen Free Clinic. Other state and local human service agencies provide access to programs for veterans, housing, and testing for communicable diseases. The shelter provides overnight shelter to over 700 persons annually; more than double of previous current Point in Time counts of homeless/sheltered persons for the Bell and Coryell County areas. Families in Crisis also operates one transitional housing unit previously funded by CDBG and Central Texas Youth Services operates 6 transitional housing units for youth/young adults aging out of foster care; both entities are successful in their efforts in meeting the needs of homeless persons.

Heritage House of Central Texas (HHCT) continues to work closely with individuals who are willing to participate in the Empowerment Program-designed to aid in re-establishing self-sufficiency without relying on government subsidy. HHCT staff work closely with local property owners and managers in

other entities to reduce the length of time persons experience homelessness. Bring Everyone in the Zone (BEITZ) continues to provide peer-to-peer counseling to veterans and their families, assists veterans -of all discharge types - with connecting to benefits, housing, health care, and income. During the 2015 program year, BEITZ added a second counselor/case manager to assist in directing services to homeless veterans and veterans experiencing reoccurring homeless episodes. Heritage House of Central Texas continues to assist all persons experiencing homelessness with connecting to needed resources in the prevention of reoccurrence of homelessness.

Central Texas Youth Services continues to work closely with the State of Texas in housing children and adolescents removed from abusive homes, runaway youth and young adults transitioning from foster care to independence through its Option House and Project F.U.T.U.R.E. programs. Killeen Independent Scholl district works closely with area agencies in providing services, counseling, and assistance to homeless youth. Central Texas Support Services (CTSS) provides HIV/AIDS support services for the Bell, Coryell, Hamilton, Lampasas, Milam, Mills, and San Saba Counties in central Texas. CTSS utilizes HOPWA and Ryan White Part B funding for housing and prevention service of HIV-positive clients.

With Friends in Crisis over-night homeless shelter, Families in Crisis is continuing to see more persons who suffer from chronic homelessness despite efforts in establishing or re-establishing housing for those persons initially seeking available housing assistance programs during their visit to the shelter. Although the agency utilizes both the Continuum of Care (Balance of State) grant, Emergency Solutions Grant and the jurisdiction's HOME funds for specifically addressing rapid re-housing and structured subsidy through the tenant based rental assistance program, varying degrees of all persons tend to re-enter homelessness due to mismanagement of monthly income or program or lease violations. Priorities for assistance include the most vulnerable populations including very low-income veterans, persons experiencing domestic violence and elderly.

Adjusted CDBG Budget Amount: \$ 1,185,469.52

2016 CDBG Admin	\$ 169,842.07
2016 Housing Rehabilitation	\$ 262,196.68
2016 Stewart Neighborhood Enviro Svcs.	\$ 28,130.00
2016 Stewart Neighborhood Sidewalks	\$ 120,000.00
2016 Bring Everyone in the Zone	\$ 10,000.00
2016 Community In Schools	\$ 20,594.83
2016 Families in Crisis, Inc./Transportation	\$ 5,276.00
2016 Families in Crisis, Inc./Case Worker	\$ 17,000.00
2016 Greater Killeen Free Clinic	\$ 23,594.82
2016 Heritage House of Central TX	\$ 10,000.00
2016 Hill Country Comm. Action	\$ 7,500.00
2016 Elderly Transportation Program	\$ 40,000.00
2015 Stewart Neighborhood Parks & Rec	\$ 264,539.09
2015 Stewart Neighborhood Sidewalks	\$ 140,325.90
2014 Stewart Neighborhood Improvements	\$ <u>66,470.13</u>
	\$ 1,185,469.52

Unprogrammed Balance: \$ 246,954.23

2016 CDBG Administration	\$ 11,744.13
2016 Families in Crisis, Inc./Transportation	\$ 2,224.00
2016 Girl Scouts of CTX	\$ 209,248.00
2015 Stewart Neighborhood Parks & Rec.	\$ 1.51
2016 Program Income Received	\$ 12,874.85
2015 Program Income Received	\$ 10,829.10
Cash on Hand at the end of reporting	\$ <u>32.64</u>
	\$ 246,954.23



Year 3 - 2015-2019 Consolidated Strategic Plan

**Consolidated Annual
Performance Evaluation &
Report**

FY 2017



**December
2018**

Community Development Department

CR-05 - Goals and Outcomes

Progress the jurisdiction has made in carrying out its strategic plan and its action plan.
91.520(a)

This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.

This report covers the period beginning October 1, 2017 and ends September 30, 2018.

Public Service programs assisted 11% more persons than estimated (3289 vs. 2935). Four (4) CDBG funded housing (rehabilitation) projects were completed during the fiscal year with total program results significantly less than estimated. Public Infrastructure and Improvements were anticipated to be completed for the Killeen Stewart Neighborhood Phase 4 - sidewalk reconstruction project unfortunately contractor illness and weather related issues stalled the start from early February to late April; rain delays late in the program year also caused more than 25 days delay toward the project completion. Continued improvements in the Stewart Neighborhood help sustain existing households in aging housing and the neighborhood while increasing connectivity to the nearby Eastward Elementary School, local store and the overall neighborhood. CDBG funding from the previously funded public facilities improvements-Public/NPOs –Girls Scouts of Central Texas Killeen Service Center was reallocated to the Killeen Community Services Department for the Bob Gilmore Senior Center renovations-entry, restrooms, A/E services, hazardous materials (asbestos). That project did not get underway until late August due to negotiation on the services for the Architect and Engineer. Remaining projects from FY 2017 were completed during the program year which includes all public/human service programs.

HOME program funded housing activities included 4 (four) First Time Homebuyer Assistance with Repairs (rehabilitation) activities and Tenant Based Rental Assistance (TBRA) for target populations: domestic violence survivors, veterans, and households at risk of homelessness.

The jurisdiction continues to move activities that are part of its 2015-2019 ConPlan to the data collection for the Con Plan Goals and Accomplishments report. TBRA activities from previous years funding continued to assist eligible households throughout the report year with ongoing rental assistance provided to 20 households (FY14 and FY2016 HOME TBRA) and an additional 12 new households began receiving the monthly subsidy under the FY2016 HOME funded TBRA program. The jurisdiction will continue to work on aligning the annual projects with the ConPlan goals list to better aggregate the information in the IDIS report system.

The City estimates approximately \$642,391.77 was leveraged through federal, state, and local resources totaling over \$849,303.23 which was delivered through local health and human services programs and decent housing opportunities for the Killeen community

Comparison of the proposed versus actual outcomes for each outcome measure submitted

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	CDBG	889,739	202,981
HOME	HOME	381,657	646,322
HOPWA	HOPWA		
ESG	ESG		
Other	Other		

Table 3 - Resources Made Available

Narrative

Annual HUD allocations and total expenditures are identified in the chart above for program year 2017 (Oct. 1, 2017 – Sept. 30, 2018). Additional resources made available during the reporting period include a portion of program year 2016 CDBG funds reallocated to the Bob Gilmore Senior Center renovations project. The CDBG program human service agencies combined additional public and private funds with the HUD (federal) funds to complete the public service programs. The additional funding sources are as follows: HUD- Continuum of Care (BoS award to Families In Crisis, Inc.), Texas General Revenue Fund, Texas State Health and Human Services Commission, Bell County, Texas Veterans Commission-Fund for Veterans Assistance, Texas Department of State Health Services, Metroplex Hospital (Adventist Health Care), Seton Hospital, United Way of the Greater Fort Hood Area, Killeen Independent School District, City of Harker Heights, Caring Hearts, Lion’s Club Foundation, Texas Methodist Foundation, Texas Department of Aging and Disability Services, Texas Community Services Block Grant, Killeen Rotary Club, City of Killeen General Fund and other individual donors and contributors to local non-profit organizations. These additional sources provided over \$595,879.68 to aid in the delivery of human and public service programs under the jurisdiction's CDBG program.

In late December 2017, the jurisdiction re-allocated a portion of its public facilities/improvements funds from its 2016 program year when the Girl Scouts of Central Texas returned an allocation of \$209,248 which was allocated toward the rehabilitation of its Killeen Service Center. Bids for the project came in well over the available project budget making it unfeasible for the organization to hold on to the CDBG funds while waiting for unknown resources. The jurisdiction accepted proposals for local public facility improvements and public improvement projects; had a 30-day comment period for the reallocation of the funds [in accordance with its Citizen Participation Plan], re-allocating the funds to the Bob Gilmore Senior Center (BGSC) for renovations associated with the restrooms, and entry, asbestos testing and abatement, and architectural/engineering. Funds were used for testing for asbestos and A/E services; bid specifications were in development at the end of the report year.

Under the HOME program, the jurisdiction expended entitlement funds on the First Time Homebuyer (acquisition) with Repairs (rehab) program and on TBRA activities through its subrecipient-Families in Crisis. Four new first time homebuyers were assisted into homeownership; 12 new TBRA client

houesholds (27 persons) were assisted with monthly rental assistance; additionally, 20 existing client housholds (46 persons) continued to receive monthly TBRA funidng throughout the 2017 program year.

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
Grantee Boundaries	56	56	City Wide
North Killeen Target Area	34	34	Stewart Neighborhood Phase 4 - Sidewalk Renovations

Table 4 – Identify the geographic distribution and location of investments

Narrative

The City and its subrecipients carried out projects in areas designated as low-income within the city, as identified in updates from the 2011-2013 American Community Survey (ACS) data, [although no specific area distribution is required in the consideration when making allocations to projects], priority is given to those projects that intend to serve priority populations- for public services, and areas within the city that have higher concentrations of minority and low-income households for public and facilities improvements. The planned percentage distribution, is based upon the areas identified above - Grantee Boundaries and North Killeen Target Area, are consistent with the expected results; difference is likely due to rounding of figures. HOME Program funds are distributed throughout the jurisdiction's (grantee) boundaries so as not to steer persons or households to specific neighborhoods or areas.

CDBG funds used for public facilities and public improvements continue to be targeted toward concentrated areas of low-income persons and households which are usually more expensive and funding is not restricted to a percentage of the annual grant - like the maximum percentage applied to public service programs serving low-income households throughout the jurisdiction's (grantee) boundaries. The FY 2017 public facility activity-Stewart Neighborhood Project Phase 4 continued improvements to the residential sidewalks in the North Killeen Target Area.



Year 4 - 2015-2019 Consolidated Strategic Plan

**Consolidated Annual
Performance Evaluation &
Report**

PROGRAM YEAR

2018

DRAFT

December

2019

Community Development Department

Oct. 1, 2018 – Sept. 30, 2019

CR-05 - Goals and Outcomes

Progress the jurisdiction has made in carrying out its strategic plan and its action plan.
91.520(a)

This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.

Public Service programs assisted 156% more persons than estimated (4090 vs. 2617). Two (2) CDBG funded housing (rehabilitation) projects were completed during the fiscal year with total program results significantly less than estimated. **One (1) PY2017 Public Infrastructure and Improvements project was completed - Killeen Stewart Neighborhood Phase 4 - sidewalk reconstruction project. These improvements help sustain residential neighborhoods with aging housing stock while increasing pedestrian connectivity to the nearby Eastward Elementary School, local store and the overall Stewart neighborhood.** CDBG funding from the previously funded public facilities improvements- Killeen Community Services Department Bob Gilmore Senior Center renovations was stifled after receiving a structural engineering report indicating the existing building is not stable to take on renovations and could not be renovated. This information came at the program year mid-way point in March 2019 which then ended the vision of renovations making way for possibly new construction of the facility on the Killeen Community Center campus. Additional actions include seeking a new A&E firm for the Senior Center project. Remaining projects from FY 2018 were completed during the program year which includes all public/human service programs.

HOME program funded housing activities included 9 (nine) First Time Homebuyer Assistance with Repairs (rehabilitation) and continued assistance to 6 (six) households from a 2014 funded Tenant Based Rental Assistance (TBRA) program and beginning a new TBRA program for target populations of domestic violence survivors and persons at-risk of homelessness. A total of 19 new households were placed on the TBRA program. HOME also funded two security deposit programs with Bring Everyone in the Zone and Heritage House of Central Texas. These two agencies pay the first month rent for the household, HOME TBRA pays for the security deposit, and the client household pays the monthly contract rent; 4 new households were assisted through this program. The same nine (9) households assisted into homeownership also received repair (rehabilitation) actions to the homes ensuring a minimum life of major components within the home.

The jurisdiction continues to move activities that are part of its 2015-2019 ConPlan to the data collection for the Con Plan Goals and Accomplishments report. The jurisdiction will continue to work on aligning the annual projects with the ConPlan goals list to better aggregate the information in the IDIS report system.

The City estimates approximately \$441,227.80 was leveraged through federal, state, and local resources totaling over \$826,264.00 that was delivered through local health and human services programs and decent housing opportunities for the Killeen community

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	1,004,950	731,064
HOME	public - federal	642,828	400,104

Table 3 - Resources Made Available

Narrative

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
Grantee Boundaries	44	46	City Wide
North Killeen Target Area	56	54	

Table 4 – Identify the geographic distribution and location of investments

Narrative

The local target area - North Killeen Local Target Area (Large and Small) is identified in the jurisdictions 2015-2019 Consolidated Plan.

The North Killeen Local Target Area encompasses census tracts 226, 228.01, 229, and 235 in their entirety; 2 partial census tracts are included in the local target area, which are 230 and 222. One other census tract is included due to the number and concentration of low-income households - 231.04. Each of these census tracts have above average (greater than 51%) concentrations of low-income households, aging infrastructure, deteriorating residential dwelling units or units in need of rehabilitation to maintain their standard housing status. The local target area also contains a smaller area within the large area where housing stock construction pre-dates 1950 and infrastructure is also aging and in need of upgrades and or replacements. Low income is defined by HUD as a household having gross annual income, as adjusted by household size, equal to or less than 80% of the area median income. The metropolitan statistical area (msa) governing the jurisdiction's geographic area is the Killeen-Temple, TX MSA. A low-income target area is an area consisting of US Census Tracts and Block Groups where 51% or more low-income persons reside. Each of the census tracts in the North Killeen Local Target Area meet the definition of a low-income census tract [having 51% or more of the population within the tract having income at or below 80% of the area median income]. Three partial census tracts are included in

the North Killeen Target Area that, according to HUD CPD Map data, do not meet the definition of a low-income census tract however, these census tracts contain poverty level households within those tracts with an average of 34.93% experiencing housing cost burden.

The 2018 program year funds allocations were close to the estimated percentage from the 2018 Annual Action Plan with a 2% difference (less) allocated to the local target area. Geographic distribution of program year 2018 funds in the North Killeen Local Target Area were allocated for the Bob Gilmore Senior Center (CDBG) and North Killeen Housing Redevelopment Program (HOME). Other remaining activities and projects were delivered city wide to eligible low-income persons and households.



U.S. Department of Housing and Urban Development
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 CDBG Activity Summary Report (GPR) for Program Year 2018
 KILLEEN

Date: 09-Nov-2019
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 Page: 3

PGM Year: 2017

Project: 0003 - Killeen Public Works/Streets- Stewart Neighborhood Phase 4

IDIS Activity: 1079 - Stewart Neighborhood - Phase 4

Status: Completed 4/1/2019 12:00:00 AM
 Location: 3201A S W S Young Dr Killeen, TX 76542-6157

Objective: Create suitable living environments
 Outcome: Availability/accessibility
 Matrix Code: Sidewalks (03L)

National Objective: LMA

Initial Funding Date: 11/30/2017

Description:

CDBG funds will be used for the Stewart Neighborhood Phase IV project- sidewalk reconstruction - removal of existing and install new (not to exceed 20% overall increase) sidewalks in the residential area beginning at 18th Street on Duncan Street [the remaining street in the Stewart neighborhood].

Financing

	Fund Type	Grant Year	Grant	Funded Amount	Drawn In Program Year	Drawn Thru Program Year
CDBG	EN	2017	B17MC48002G	\$298,069.50	\$216,468.17	\$298,069.50
	PI			\$445.60	\$0.00	\$445.60
Total	Total			\$298,515.10	\$216,468.17	\$298,515.10

Proposed Accomplishments

People (General) : 4,449
 Total Population in Service Area: 4,045
 Census Tract Percent Low / Mod: 69.59

Annual Accomplishments

Years	Accomplishment Narrative	# Benefitting
2017	<p>4th Qtr: Project continues to be underway achieving nearly 60% completion at the end of the report period; significant delays due to weather caused an additional 20 days added to the contract extending the contract until February 8, 2019.</p> <p>3rd Qtr: Project continues to be underway; significant delay in completion due to weather.</p> <p>2nd Qtr: Project Bid award made in late March 2018 and notice to proceed issued for April 23, 2018. in late February; construction schedule is 270 days.</p> <p>1st Qtr: Project specifications, bid packet, pre bid meeting, and bid opening completed this quarter. Anticipate 79 of 84 identified substandard sections of sidewalk and drive approaches in the Stewart Neighborhood will be corrected through this project. Bid award expected early next quarter with notice to proceed in late February; construction schedule is 270 days.</p>	



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Years	Accomplishment Narrative	# Benefiting
2018	<p>3rd Qtr - project closeout is complete.</p> <p>2nd Qtr: project is complete as of Feb 15, 2019. Waiting on final documentation from contractor - warranty, and affidavit, for close out. Pay application submitted with final close out in next 2 weeks.</p> <p>1st Qtr - Project continues with extensive weather related delays in October and November adding an additional 27 days to completion.</p>	

Stewart Neighborhood Phase IV Project Complete



Office of Community Planning and Development
 U.S. Department of Housing and Urban Development
 Integrated Disbursement and Information System
 PR26 - CDBG Financial Summary Report
 Program Year 2018
 KILLEEN, TX

DATE: 11-14-19
 TIME: 14:03
 PAGE: 2

LINE 17 DETAIL: ACTIVITIES TO CONSIDER IN DETERMINING THE AMOUNT TO ENTER ON LINE 17
 Report returned no data.

LINE 18 DETAIL: ACTIVITIES TO CONSIDER IN DETERMINING THE AMOUNT TO ENTER ON LINE 18
 Report returned no data.

LINE 19 DETAIL: ACTIVITIES INCLUDED IN THE COMPUTATION OF LINE 19

Plan Year	IDIS Project	IDIS Activity	Voucher Number	Activity Name	Matrix Code	National Objective	Drawn Amount
2016	17	1092	6226218	Gilmore Senior Center Renovations	03A	LMC	\$7,300.00
2016	17	1092	6233795	Gilmore Senior Center Renovations	03A	LMC	\$28,700.00
					03A	Matrix Code	\$36,000.00
2017	3	1079	6226218	Stewart Neighborhood - Phase 4	03L	LMA	\$76,298.30
2017	3	1079	6241463	Stewart Neighborhood - Phase 4	03L	LMA	\$122,734.87
2017	3	1079	6252022	Stewart Neighborhood - Phase 4	03L	LMA	\$17,435.00
					03L	Matrix Code	\$216,468.17
2018	10	1106	6241463	HCCAA/Killeen Senior Meals Program	05A	LMC	\$2,366.76
2018	10	1106	6272751	HCCAA/Killeen Senior Meals Program	05A	LMC	\$2,425.28
2018	10	1106	6288180	HCCAA/Killeen Senior Meals Program	05A	LMC	\$2,357.54
2018	10	1106	6321620	HCCAA/Killeen Senior Meals Program	05A	LMC	\$2,340.42
2018	11	1107	6226218	COK/Elderly Transportation Program	05A	LMC	\$13,060.90
2018	11	1107	6233795	COK/Elderly Transportation Program	05A	LMC	\$6,479.60
2018	11	1107	6241463	COK/Elderly Transportation Program	05A	LMC	\$6,874.40
2018	11	1107	6252022	COK/Elderly Transportation Program	05A	LMC	\$6,074.05
2018	11	1107	6263475	COK/Elderly Transportation Program	05A	LMC	\$6,410.65
2018	11	1107	6272751	COK/Elderly Transportation Program	05A	LMC	\$6,957.60
2018	11	1107	6288180	COK/Elderly Transportation Program	05A	LMC	\$4,142.80
					05A	Matrix Code	\$59,490.00
2018	5	1100	6233795	CIS Connections Program, Eastward ES	05D	LMCSV	\$5,250.09
2018	5	1100	6263475	CIS Connections Program, Eastward ES	05D	LMCSV	\$5,249.97
2018	5	1100	6288180	CIS Connections Program, Eastward ES	05D	LMCSV	\$5,249.97
2018	5	1100	6321620	CIS Connections Program, Eastward ES	05D	LMCSV	\$5,249.97
					05D	Matrix Code	\$21,000.00
2018	6	1102	6233795	FIC/Client Transportation Program	05G	LMC	\$444.00
2018	6	1102	6252022	FIC/Client Transportation Program	05G	LMC	\$212.00
2018	6	1102	6263475	FIC/Client Transportation Program	05G	LMC	\$241.00
2018	6	1102	6288180	FIC/Client Transportation Program	05G	LMC	\$786.00
2018	6	1102	6300936	FIC/Client Transportation Program	05G	LMC	\$293.00
2018	6	1102	6321620	FIC/Client Transportation Program	05G	LMC	\$524.00
					05G	Matrix Code	\$2,500.00
2018	8	1104	6226218	GKFC/Clinical Salary Support	05M	LMC	\$2,347.95
2018	8	1104	6233795	GKFC/Clinical Salary Support	05M	LMC	\$2,241.30
2018	8	1104	6252022	GKFC/Clinical Salary Support	05M	LMC	\$4,167.06
2018	8	1104	6263475	GKFC/Clinical Salary Support	05M	LMC	\$4,131.93
2018	8	1104	6288180	GKFC/Clinical Salary Support	05M	LMC	\$6,719.41
2018	8	1104	6306107	GKFC/Clinical Salary Support	05M	LMC	\$2,489.32
2018	8	1104	6321620	GKFC/Clinical Salary Support	05M	LMC	\$4,893.03
					05M	Matrix Code	\$27,000.00
2018	4	1099	6241463	Military Support Program	05Z	LMC	\$2,526.14
2018	4	1099	6263475	Military Support Program	05Z	LMC	\$2,881.78
2018	4	1099	6288180	Military Support Program	05Z	LMC	\$3,790.62
2018	4	1099	6306107	Military Support Program	05Z	LMC	\$1,135.12
2018	4	1099	6309924	Military Support Program	05Z	LMC	\$1,098.33
2018	4	1099	6321620	Military Support Program	05Z	LMC	\$638.61
2018	7	1103	6233795	FIC/ Homeless Shelter Case Manager	05Z	LMC	\$3,703.49
2018	7	1103	6252022	FIC/ Homeless Shelter Case Manager	05Z	LMC	\$1,899.54

Attachment to CDBG Financial Summary Report - FY 2018-19 Killeen, TX

ADJUSTED CDBG BUDGET AMOUNT	IDIS Activity #	\$ Budgeted
2018 CDBG Administration/Planning	1097	\$ 177,642.04
2018 Housing Rehabilitation Admin	1098	\$ 70,002.19
2018 Housing Rehabilitation		\$ 17,359.81
2018 Bob Gilmore Senior Center Improvements	1092	\$ 574,447.05
2018 Bring Everyone in the Zone	1099	\$ 12,070.60
2018 Communities in Schools	1100	\$ 21,000.00
2018 Families in Crisis, Inc. Transportation	1102	\$ 2,500.00
2018 Families in Crisis, Inc. Case Manager	1103	\$ 19,528.89
2018 Greater Killeen Free Clinic	1104	\$ 27,000.00
2018 Heritage House of Central Texas	1105	\$ 5,000.00
2018 Hill Country Community Action Association	1106	\$ 9,490.00
2018 COK Elderly Transportation Program	1107	\$ 50,000.00
2017 Stewart Neighborhood Sidewalks	1079	\$ 216,468.17
2017 Housing Rehabilitation Program		\$ 147,651.34
2016 Bob Gilmore Senior Center Improvements	1092	\$ 188,573.00
TOTAL ADJUSTED CDBG BUDGET AMOUNT		\$ 1,538,733.09
UNPROGRAMMED BALANCE		
2018 CDBG Administration/Planning	1097	\$ 18,438.76
2018 Families in Crisis, Inc. Case Manager	1103	\$ 471.11
2017 CDBG Administration/Planning	1077	\$ 6,461.96
2017 Stewart Neighborhood Improvements/Sidewalks	1079	\$ 2,652.12
2018 Program Income Receipted		\$ 4,793.19
2017 Program Income Receipted (additional)		\$ 260.80
Cash on hand at the end of reporting period		\$ 32.64
TOTAL UNPROGRAMMED BALANCE:		\$ 33,110.58

ADJUSTMENTS TO FY 2018-19 CDBG FINANCIAL SUMMARY REPORT

No adjustments made during this reporting period.

Appeal Response



TEXAS DEPARTMENT OF HOUSING AND COMMUNITY AFFAIRS

www.tdhca.state.tx.us

Greg Abbott
GOVERNOR

BOARD MEMBERS
Leslie Bingham, *Vice Chair*
Paul A. Braden, Member
Sharon Thomason, Member
Leo Vasquez, Member

May 13, 2020

Writer's direct dial: (512) 475-3296
Email: bobby.wilkinson@tdhca.state.tx.us

Arthur J. Schuldt, Jr.
Killeen High View, LP
1935 Airline Dr., Ste. 200
Bossier City, LA 71112

RE: SCORING APPEAL RESPONSE FOR 20148 HIGH VIEW PLACE, KILLEEN

Dear Mr. Schuldt:

The Texas Department of Housing and Community Affairs received your appeal dated May 5, 2020, regarding scoring for the Application named above. Staff found that the Application did not qualify for seven points under 10 TAC §11.9(d)(7) related to Concerted Revitalization Plan because the Application only included a HUD Comprehensive Plan and CAPER as support documentation evidence for the points. The Application self-score was reduced by seven points, pending the Applicant's ability to appeal.

Per the rule, "[a] Consolidated Plan, One-year Action Plan or any other plan prepared to meet HUD requirements will not meet the requirements under this clause, unless evidence is presented that additional efforts have been undertaken to meet the requirements in clause (iii) of that subparagraph." The appeal describes the steps that were taken by the City of Killeen in developing its HUD Consolidated Strategic Plan for 2015-2019 (the Plan) and states that "while it is true that this Application relied upon the Consolidated Strategic Plan for the City of Killeen, it also provided ample evidence 'that additional efforts have been undertaken to meet the requirements in clause (iii) of this subparagraph.'" Per the appeal, the "degree of detail (unusual in a Comprehensive Plan) was clearly intended to implement the revitalization initiatives within the North Killeen Local Target Area without the necessity of a subsequent implementing plan, as is sometimes used by cities."

After reviewing the Plan, I do not find evidence has been presented that additional efforts beyond anything already prepared to meet HUD requirements were undertaken to meet the rule requirements. While it is clear that the Consolidated Plan *could* be used as a basis to meet the requirements of the rule, the rule requirement to present evidence of "additional efforts" appears to require the presentation of



evidence outside of the Consolidated Plan showing such additional efforts beyond what is set out in the HUD plan. The appeal seems to take the opposite view – that such evidence of “additional effort” can be seen entirely within the Consolidated Plan, itself:

In this instance, in developing its Consolidated Strategic Plan for 2015 – 2019 (the “Plan”), the City of Killeen went to the effort to identify by public comment the area within the city that most required revitalization. The area identified was the North Killeen Local Target Area, which includes the central business district, the historical area, the Stewart Neighborhood and the High View Development Site. The City used the Plan to establish an implementation plan by which problems identified by the local residents in the North Killeen Local Target Area could be mitigated. Additionally, funding was allocated for some initial infrastructure projects within the North Killeen Local Target Area. In accomplishing all of this, the City went beyond the customary consolidated plan and established the identification of problems, possible solutions and funding for the specific targeted area – in fact, documenting every requirement of clause (iii) of Section 11.9(d)(7)(a) of the QAP.

Because the appeal did not provide clear evidence that the “additional efforts” clause of the rule has been met, I find that Staff was correct in concluding that the Application does not qualify for seven points under §11.9(d)(7) related to Concerted Revitalization Plan. Accordingly, I am denying the appeal. You have indicated that if I do not grant your appeal, you wish to have your appeal heard by the board. Your appeal will be placed on the agenda for the May 23, 2020, meeting of the Department’s Governing Board. It is noted that the appeal election form submitted states that the Applicant reserves “the right to appeal and submit additional information pending the Executive Director decision.” Keep in mind that the Appeals rule limits information that can be presented to the Board. Please review 10 TAC §11.902 for the appeal process.

If you have any questions or require further information, please contact Marni Holloway, Multifamily Finance Director, at marni.holloway@tdhca.state.tx.us.

Sincerely,



Bobby Wilkinson
Executive Director

BOARD ACTION ITEM
MULTIFAMILY FINANCE DIVISION
MAY 21, 2020

Presentation, discussion, and possible action on timely filed appeals under the Department's Multifamily Program Rules. Application 20318 Cypress Creek Apartment Homes at La Porte

RECOMMENDED ACTION

WHEREAS, the appeal relates to Competitive Housing Tax Credit (HTC) application 20318 Cypress Creek Apartment Homes at La Porte, which was submitted to the Department by the Full Application Delivery Date;

WHEREAS, staff determined that the Application should be terminated because the Development Site is located within the threshold distance of Undesirable Site Features enumerated in 10 TAC §11.101(a)(2);

WHEREAS, the Applicant timely filed an appeal; and

WHEREAS, the Executive Director denied the appeal;

NOW, therefore, it is hereby

RESOLVED, that the appeal for 20318 Cypress Creek Apartment Homes at La Porte is hereby denied.

BACKGROUND

HTC Application 20318 Cypress Creek Apartment Homes at La Porte proposes the New Construction of 180 Units for the general population. The Development would be located in La Porte would include 93 restricted Units and 87 market rate Units.

10 TAC §11.101(a) related to Site and Development Requirements and Restrictions identifies specific requirements and restrictions related to a Development Site seeking multifamily funding or assistance from the Department. 10 TAC §11.101(a)(2) related to Undesirable Site features identifies those features that must be disclosed by Applicants at the time of Application. Per the rule, Undesirable Site features include:

(F) Development Sites located within 500 feet of heavy industry (i.e. facilities that require extensive use of land and machinery, produce high levels of external noise such as manufacturing plants, or maintains fuel storage facilities (excluding gas stations);

(H) Development Sites in which the buildings are located within the accident potential zones or the runway clear zones of any airport;

(I) Development Sites that contain one or more pipelines, situated underground or aboveground, which carry highly volatile liquids or Development Sites located adjacent to a pipeline easement (for a pipeline carrying highly volatile liquids), the Application must include a plan for developing near the pipeline(s) and mitigation, if any, in accordance with a report conforming to the Pipelines and Informed Planning Alliance (PIPA);

The Application disclosed that the Development Site is located approximately 430 feet from a 5,000-gallon aviation gasoline aboveground storage tank (AST) that is part of an airplane fueling station; is adjacent to an easement that contains pipelines that carry highly volatile liquids; is within approximately 650 feet of a runway that is part of the La Porte Municipal Airport; and is within the Existing and Ultimate Runway Protection Zone of the airport. Per the disclosure, no buildings will be placed in the zone. The disclosure included pages from the ESA to address proximity to heavy industry, which the report identifies as the fueling station (the Applicant has suggested is a gas station and therefore exempt), and a PIPA report to address the pipelines.

Regarding proximity to the airport and the fueling station, the airplane fueling station is not a gas station, and does not qualify the Application for the exception indicated in the rule. Per the Application none of the buildings will be located within the accident potential zones or the runway clear zones of the airport. The Feasibility Report states:

“Due to the adjacent airport, the developer has discussed new construction requirements with City staff to obtain approval from City of La Porte’s Public Works Director. Based on their discussions with the City engineer, a runway protection zone easement has been imposed on the site plan for compliance.”

Review of the Site Plan indicates that the corner of the site that is within both the existing and the ultimate runway protection zones will consist of a storm water detention area and a portion of the parking lot. The runway that is closest to the Development Site is used by landing planes that would approach from southeast of the Development Site. The fueling station and its aboveground storage tank are outside the flight path and both the existing and ultimate zones. Both zones cross the pipeline easement.

The entire western boundary of the Development Site borders the pipeline corridor. Per the site plan, this side of the site will consist of parking and a detention area. Regarding the nearest hazardous liquids pipeline, the report indicates a potential impact radius of 312 feet and states that “[b]ecause flame resistant materials will be used for the construction of the buildings and structures and egress will be provided on the sides of structures opposite the pipeline corridor, a 50-foot setback... should be adequate.” Regarding the nearest crude oil pipeline, the report indicates the concept of an impact radius does not apply and that any harm from a leak would be environmental in nature. Regarding the Highly Volatile Liquid (HVL) pipeline, the report states that since HVLs are heavier than the air “they will tend to collect in low-lying areas, displacing the oxygen in those areas. ... Because of the flat terrain in the vicinity of the pipeline corridor, a small berm along the western edge of the site should be sufficient to prevent the migration of heavier-than-air vapors to the proposed CCLP apartments. Absent adverse wind conditions, the vapors would migrate” to the airport, across the highway, or along the pipeline corridor.

Taken individually, each of these issues and the mitigation offered might be acceptable to allow staff to determine that the issue does not trigger ineligibility on the basis of 10 TAC §11.101(a)(2). However, the Development Site's proximity to the existing and the ultimate runway protection zones, coupled with the proximity to the fueling station is greatly concerning to staff. Further, a landing plane could very well introduce the "adverse wind conditions" the PIPA report suggests could cause HVL vapors to migrate from the pipeline corridor toward the Development should a leak occur. Based on the information provided, staff determined that the Development Site is ineligible pursuant to 10 TAC §11.101(a)(2).

The appeal restates much of the information already reviewed by staff, and offers as new information an aeronautical study from the Federal Aviation Administration Southwest Regional Office in Fort Worth, which found that the Development will not be a hazard to air navigation, **expressly conditioned** on the installation of special rooftop markings and lighting on the building nearest to the runway. None of the information provided in the appeal led to a different conclusion than staff: the Development Site's proximity to the runway protection zones, a fuel storage facility (i.e. a 5000 above-ground airplane fueling station), and the pipeline corridor makes this site an unnecessarily hazardous site to locate a multifamily development under the 2020 QAP.

Staff recommends the Board deny the appeal.

20318 Cypress Creek
Apartments at La Porte
Termination Letter



TEXAS DEPARTMENT OF HOUSING AND COMMUNITY AFFAIRS

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Greg Abbott
GOVERNOR

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Leo Vasquez, *Member*

April 13, 2020

Writer's direct dial: 512/475-1676
Email: marni.hollaway@tdhca.state.tx.us

Stuart Shaw
Cypress Creek La Porte, LP
901 S. Mopac Expy., Bldg. 5, Ste. 100
Austin, Texas 78746

RE: APPLICATION DISCLOSURE FOR 20318 CYPRESS CREEK APARTMENT HOMES AT LA PORTE, LA PORTE

Dear Mr. Shaw:

The Texas Department of Housing and Community Affairs received your disclosure which indicates that the Development Site is located within 500 feet of heavy industry, and contains or is adjacent to an easement that contains pipelines that carry highly volatile liquids. Per 10 TAC §11.101(a)(2), undesirable site features include:

- (F) Development Sites located within 500 feet of heavy industry (i.e. facilities that require extensive use of land and machinery, produce high levels of external noise such as manufacturing plants, or maintains fuel storage facilities (excluding gas stations);
- (I) Development Sites that contain one or more pipelines, situated underground or aboveground, which carry highly volatile liquids or Development Sites located adjacent to a pipeline easement (for a pipeline carrying highly volatile liquids), the Application must include a plan for developing near the pipeline(s) and mitigation, if any, in accordance with a report conforming to the Pipelines and Informed Planning Alliance (PIPA);

The Development Site boundary is approximately 650 feet from a runway that is part of the La Porte Municipal Airport, and within 300 feet of an aviation fueling station, which the Applicant has referred to as a "gas station." Per the Phase 1 Environmental Site Assessment (ESA), at the fueling station, "a 5,000-gallon aviation gasoline aboveground storage tank (AST) is positioned approximately 430 feet west of the site." Per the ESA, "[d]ue to the absence and/or distance of aboveground stationary containerized hazards of an explosive or fire prone nature a HUD blast zone map and calculation were not deemed necessary at this time." Also, a portion of the Development Site is within the "Existing and Ultimate Runway Protection Zone" of the La Porte Municipal Airport. Per the disclosure, no buildings



will be placed in the zone. The disclosure also describes a major pipeline corridor that is west of and adjacent to the Development Site boundary. The disclosure included pages from the ESA to address proximity to heavy industry, which the report identifies as the fueling station, and a PIPA report to address the pipelines.

Regarding proximity to the airport and the fueling station, the airplane fueling station is not a gas station and does not qualify the Application for the exception indicated in the rule. Per the Application none of the buildings will be located within the accident potential zones or the runway clear zones of the airport. The Feasibility Report states:

“Due to the adjacent airport, the developer has discussed new construction requirements with City staff to obtain approval from City of La Porte’s Public Works Director. Based on their discussions with the City engineer, a runway protection zone easement has been imposed on the site plan for compliance.”

Review of the Site Plan indicates that the corner of the site that is within both the existing and the ultimate runway protection zones will consist of a storm water detention area and a portion of the parking lot. The runway that is closest to the Development Site is used by landing planes that would approach from southeast of the Development Site. The fueling station and its aboveground storage tank are outside the flight path and both the existing and ultimate zones. Both zones cross the pipeline easement.

Per the PIPA report, the pipeline corridor includes at least 34 active pipelines and all of the pipelines are underground. The pipelines carry hazardous liquids (crude oil) and gas (hydrogen), and two of them were identified as carrying highly volatile liquids (HVLs) (“probably propane”). Per the report:

“The corridor itself is very well maintained. Gas transmission pipelines must be patrolled at road crossings (Spencer Highway) at least twice each calendar year... . Hazardous liquid pipelines must be patrolled at least 26 times each calendar year... . In essence, the pipeline corridor is under constant surveillance by one or more pipeline operators.”

The entire western boundary of the Development Site borders the pipeline corridor. Per the site plan, this side of the site will consist of two rows of parking in one part and a detention area and one row of parking in the rest. Regarding the nearest hazardous liquids pipeline, the report indicates a potential impact radius of 312 feet and states that “[b]ecause flame resistant materials will be used for the construction of the buildings and structures and egress will be provided on the sides of structures opposite the pipeline corridor, a 50-foot setback... should be adequate.” Regarding the nearest crude oil pipeline, the report indicates the concept of an impact radius does not apply and that any harm from a leak would be environmental in nature. Regarding the HVL pipeline, the report states that since HVLs are heavier than the air “they will tend to collect in low-lying areas, displacing the oxygen in those areas. ... Because of the flat terrain in the vicinity of the pipeline corridor, a small berm along the western edge of the site should be sufficient to prevent the migration of heavier-than-air vapors to the proposed CCLP

apartments.” Absent adverse wind conditions, the vapors would migrate” to the airport, across the highway, or along the pipeline corridor.

Taken individually, each of these issues and the mitigation offered might be acceptable enough to allow staff to determine that the issue does not trigger ineligibility on the basis of 10 TAC §11.101(a)(2). However, the Development Site’s proximity to the existing and the ultimate runway protection zones, coupled with the proximity to the fueling station is greatly concerning to staff. Further, a landing plane could very well introduce the “adverse wind conditions” the report suggests could cause HVL vapors to migrate from the pipeline corridor toward the Development should a leak occur. Based on the information provided, staff has determined that the Development Site is ineligible pursuant to 10 TAC §11.101(a)(2). Please note that this site has not been reviewed for other environmental concerns that may be reflected in the Phase I ESA, and the site has not been reviewed for the site and neighborhood standards of the HOME program.

An appeal process exists for the Housing Tax Credit Program. The restrictions and requirements related to the filing of an appeal can be found in 10 TAC §11.902 of the 2020 QAP. Should you choose to appeal this decision to the Executive Director, you must file your appeal, in writing, with the Department not later than seven (7) calendar days after the date of this letter. If you are not satisfied with the decision of the Executive Director or if the Executive Director does not respond, you may file a further appeal with the Board of Directors of the Texas Department of Housing and Community Affairs. Please review §11.902 of the 2020 QAP for full instructions on the appeals process.

Sincerely,

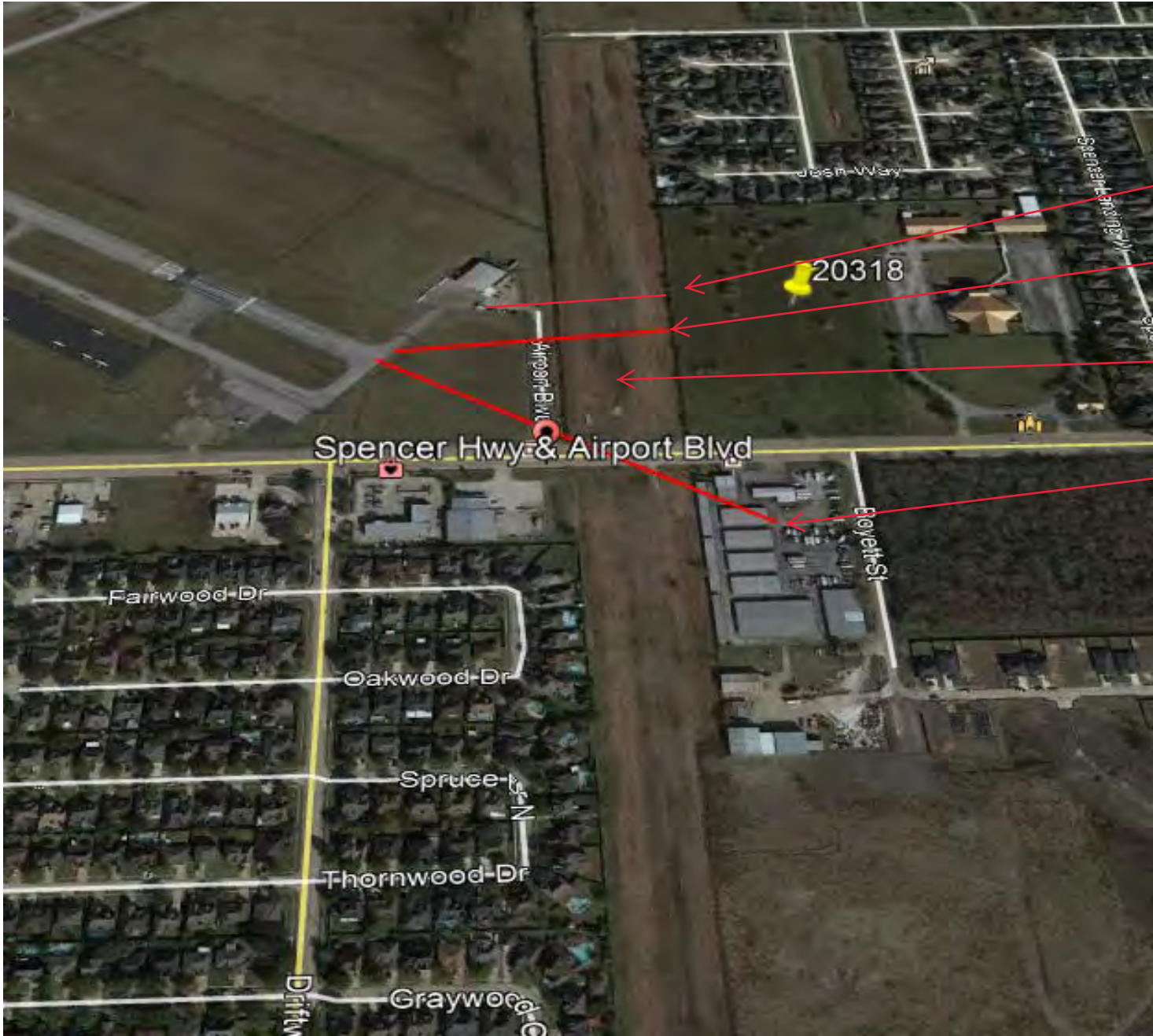
Marni

Holloway

Marni Holloway

Multifamily Finance Director

Digitally signed by
Marni Holloway
Date: 2020.04.13
15:00:49 -05'00'



~450 feet from tank

~650 feet from runway

Pipeline easement

Approach line

Appeal Documents

Cypress Creek La Porte LP

April 20, 2020

By Email to bobby.wilkinson@tdhca.state.tx.us
Bobby Wilkinson, Executive Director
Texas Department of Housing and Community Affairs
221 East 11th Street
Austin, Texas 78711

RE: #20318 Cypress Creek Apartment Homes at La Porte, La Porte, Texas (“Project”);
Appeal of Termination Under 10 TAC §11.101(a)(2) (Undesirable Site Features).

Dear Mr. Wilkinson:

This is an appeal of a Staff determination of ineligibility contained in letter from Marni Holloway, Director of Multifamily Finance, dated April 13, 2020 due to Undesirable Site Features. Ms. Holloway concluded that although each Undesirable Site Feature disclosed and mitigation offered in the 9% Application for the referenced Project might be acceptable on an individual basis, when considered together, the issues make the Development Site ineligible for Housing Tax Credit development under Section 11.101(a)(2) of the 2020 Qualified Allocation Plan (QAP). In considering our response, please take into consideration the portion of Section 11.101(a)(2) of the QAP which provides:

... Where there is a local ordinance that specifies the proximity of such undesirable feature to a multifamily development that has smaller distances than the minimum distances noted below, then such smaller distances may be used and documentation such as a copy of the local ordinance identifying such distances relative to the Development Site must be included in the Application. Pre-existing zoning does not meet the requirement for a local ordinance. If a state or federal cognizant agency would require a new facility under its jurisdiction to have a minimum separation from housing, the Department will defer to that agency and require the same separation for a new housing facility near an existing regulated or registered facility. ...

A. LA PORTE MUNICIPAL AIRPORT. The Project is to be located on approximately 10.78 acres at 11311 Spencer Highway in La Porte. The surrounding area is largely single family residential. The Project site abuts a 200-foot wide pipeline easement on its western boundary, and its southern boundary is Spencer Highway. Across the pipeline easement is the La Porte Municipal Airport (“Airport”), a small city-owned public-use airport. The Development Site boundary is approximately 650 feet from Runway 12/30.

ISSUE: Section 11.101(a)(2)(H) lists as an Undesirable Site Feature Development Sites in which the buildings are located within the accident potential zones or the runway clear zones of any airport;

1. **Runway Protection Zone.** Runway 12/30 is located approximately 650 feet to the west of the Development Site. The City of La Porte has established a Runway Protection Zone at the ends of each of the four runways - a cone-shaped restricted use area which encompasses the land which must be kept clear of structures in order to avoid navigational problems. In the Site Feasibility Study dated February 2020 filed by R. G. Miller Engineers, Inc., the Runway Protection Zone is shown in Exhibit 17 (See Exhibit A attached). The final page of this exhibit shows the extent to which the Runway Protection Zone affects the Development Site. The Existing Runway Protection Zone is depicted in green with black lien cross hatching and yellow, and clips the southwestern corner of the Development Site, which is planned for Stormwater Detention and Parking Spaces. A future “Ultimate” Runway Protection Zone, depicted in green, is intended to reduce the area in which structures are prohibited, but this is not in effect at this time. That area is depicted by the green, and would only encompass the Stormwater Detention area. Again, no structures are planned for this area.

2. **Certification by Applicant.** In the Disclosure Package for the Application, the Applicant provided a certification that no buildings will be located within the Runway Protection Zones. (See Exhibit B attached).

3. **FAA Determination of No Hazard to Air Navigation.** The Project Developer contacted the Federal Aviation Administration and requested a review of the Project’s safety in the location near Runway 12/30. The FAA reviewed the preliminary Project plans, and conducted Aeronautical Study No. 2020-ASW-1631-OE. Pursuant to the Aeronautical Study, a “Determination of No Hazard to Air Navigation” was issued on March 25, 2020 (See Exhibit C attached), finding that the proposed apartment buildings would have no substantial adverse effect on the safe and efficient utilization of the navigable airspace by aircraft or on the operation of air navigation facilities. This Determination is conditioned upon the structure being marked/lighted in accordance with FAA Advisory circular 70/7460-1 L Change 2, Obstruction Markings and Lighting. The Developer has researched the requisite equipment needed to comply with this condition and is prepared to provide the FAA Approved obstruction lighting on the roof of the apartment building closest to the runway. (See Exhibit D attached).

4. **Development Site is Zoned for Multifamily Residential.** The Development Site is currently zoned for High Density Residential (R-3) development, as evidenced by the Zoning Letter from the City of La Porte Planning and Development Department provided in the Application. (See Exhibit E attached).

5. **Surrounding Neighborhood is Primarily Residential.** North of Spencer Highway the land is primarily developed with single family housing and the Bayshore Baptist Church. South of Spencer Highway is undeveloped land, more single family housing, and some commercial used fronting on Spencer Highway. (See Exhibit F attached).

5. City Resolution of Support for the Project. The Application included a letter from the City Manager of La Porte evidencing that City Council had passed a Resolution of Support for the Project and additionally encouraged the development of the Project by providing a Commitment of Development Funding Letter. (See Exhibit G attached).

Summary: We have demonstrated: (i) the FAA's determination that the proposed Project will not be a hazard to air navigation; (ii) the Applicant's certification that the Project will be developed in compliance with the Runway Protection Zone requirements and that no building will be located in the Runway Protection Zone; (iii) the City of La Porte's approval of the Project as demonstrated by the City's zoning of the Development Site and its Resolution of Support and Commitment for Funding for the Project; and (iv) the existing primarily residential character of the neighborhood. We respectfully request a determination that the Project is not ineligible due to its proximity to an airport.

B. ADJACENT PIPELINE CORRIDOR. The western boundary of the Development Site lies adjacent to a pipeline corridor that is 200 feet wide (the "Corridor"). Multiple underground pipelines lie within the Corridor, but none are above ground and there are no pipelines located on the Development Site.

ISSUE: Section 11.101(a)(2)(I) lists as an Undesirable Site Feature Development Sites that contain one or more pipelines, situated underground or aboveground, which carry highly volatile liquids or Development Sites located adjacent to a pipeline easement (for a pipeline carrying highly volatile liquids), the Application must include a plan for developing near the pipeline(s) and mitigation, if any, in accordance with a report conforming to the Pipelines and Informed Planning Alliance (PIPA);

The Applicant obtained a PIPA Report dated February 25, 2020 which was included in the Application. (See Exhibit H attached). As you are aware, the TDHCA frequently uses the HUD requirements to establish acceptable living situations. The PIPA Report states that the 2011 HUD Multifamily Accelerated Processing (MAP) Guide had a requirement that all parts of any structure must be at least 10 feet from the outer boundary of an easement for any high pressure gas or liquid petroleum transportation pipeline. The most recent version of the MAP Guide (2016) has replaced the 2011 criteria with a requirement to calculate acceptable separation from high pressure pipelines transferring flammable and combustible liquids and gases in accordance with 24 CFR Part 51 Subpart C, Siting of HUD-Assisted Projects Near Hazardous Operations Handling Conventional Fuels or Chemicals of an Explosive or Flammable Nature. As noted by the PIPA Report, however, the term "hazard" does not include pipelines for the transmission of hazardous substances, if such pipelines are located underground or comply with applicable Federal, State and local Safety Standards. Because all of the pipelines in the Corridor are underground and the PIPA Report states that they appear to comply with applicable Federal, State and local safety standards. As a result, the pipelines in the Corridor are exempted from the requirement of establishing acceptable separation and none are considered hazards by HUD.

The PIPA Report goes on to assess the three types of pipelines in the Corridor (hazardous liquid pipelines, gas pipelines and Highly Volatile Liquid (“HVL”) pipelines). The consultant does acceptable separation analyses of the largest hazardous liquid pipeline in the Corridor, which is a proposed 36” Mobil Pipeline Company crude oil line that will be nearest to the Development Site, and a 20” Air Liquide hydrogen pipeline. Both are determined to be within acceptable limits, given the distance and design of the Project. The PIPA Report also discussed the two existing HVL pipelines which carry products that are heavier than air and tend to collect in low-lying areas. Due to the flat terrain in the vicinity of the Corridor, the inclusion of a small berm on the western edge of the Development Site was determined to be sufficient to prevent migration of heavier-than-air vapors to the apartments.

The PIPA Report states that pipelines are a “fact of life” in La Porte, and it appears that the yet-to-be installed Mobil crude oil pipeline that will be the nearest to the Development Site will be approximately 100 feet from the western boundary. According to the PIPA Report, “In essence, the pipeline corridor is under constant surveillance by one or more pipeline operators.” The Corridor crosses Spencer Highway, which requires patrolling at least twice each calendar year to observe surface conditions on and adjacent to the right-of-way for indications of leaks, construction activity or other factors affecting safety and operation, and HVL pipelines require patrolling at least 26 times each calendar year. Because each pipeline operator must document the required patrols for each owned pipeline, the Corridor’s 34 different pipelines mean almost constant supervision.

In conclusion, the Report provides a listing of PIPA Recommended Best Practices, most significant of which is that the Project incorporate a minimum setback of at least 50 feet from all pipelines and at least 10 feet from the edge of all easements, whichever is greater. The site plan for the Project incorporates this recommendation. The consultant concluded that this Development Site has very few issues compared to other projects he has evaluated, each of which is being mitigated by the Applicant pursuant to the Applicant’s agreement to follow the PIPA Property Developer/Owner Recommended Practices included in the PIPA Report.

Summary: In view of the PIPA Report’s determination that the Project, as proposed, will meet PIPA guidelines, we respectfully request that the existence of the Corridor not be held to render the Project ineligible for the Tax Credit Program.

C. EXISTENCE OF ABOVEGROUND STORAGE TANK. Staff noted that there is a 5,000 gallon aviation gasoline aboveground storage tank (“AST”) located approximately 430 feet west of the Development Site.

ISSUE: Section 11.101(a)(2)(F) lists as an Undesirable Site Feature Development Sites located within 500 feet of heavy industry (i.e. facilities that require extensive use of land and machinery, produce high levels of external noise such as manufacturing plants, or maintains fuel storage facilities (excluding gas stations);

Bobby Wilkinson, Executive Director

April 20, 2020

Page 5

The AST is owned and operated by Harvey & Rihn Aviation, which has been in business for over 40 years. According to its website, Harvey & Rihn Aviation (“H&R”) provides flight training (everything from basic flight training to tail wheel and aerobatic instruction), maintenance and repairs, hangers, and computerized testing of FAA knowledge exams for all categories and classes of Airmen and Aircraft. It also states that H&R is a full-service FBO (fixed-base operator) providing tie-down, hangar space, pilot supplies and 100LL fuel (100 octane Low Lead gasoline specifically designed for piston engine aircraft). The Phase I Environmental Site Assessment review of the Development Site prepared by Terracon Consultants, Inc. dated February 21, 2020, indicated that the AST was installed in 1999. (See Exhibit I attached). Terracon additionally concluded that based upon the distance of operations from the Development Site, the H&R facility does not constitute a Recognized Environmental Condition relative to the Development Site. Additionally, the Phase I considered H&R in the context of Section 11.101(a)(2)(F) and stated:

Based on the absence of apparent manufacturing and machining, Terracon does not consider this facility, that operates with a single aviation gasoline AST, to be considered a “heavy industry” facility as it pertains to subparagraph F. Based on Terracon’s understanding of the 2020 QAP, this facility does not appear to be considered an Undesirable Site Feature. Per HUD Guidelines, Terracon recommends that the only additional testing to be done is a noise study.

(See Exhibit J attached).

SUMMARY.

The Project will be located near La Porte Municipal Airport in an area that is primarily residential, with some commercial businesses on the south side of Spencer Highway. In general, the area surrounding the Airport is overwhelmingly residential, as shown in the high altitude aerial photograph shown in Exhibit F. The professional reports obtained regarding the AST, the Runway Protection Zone and the Corridor all indicate that the Development Site is appropriate for development for its intended use as garden-style apartments. HUD safety requirements for proximity to pipelines are met, as are FAA safety requirements for Runway Protection Zones. As shown in Exhibit I, the AST is effectively a “gas station” for small airplanes, and therefore might arguably be considered exempt from Section 1.101(a)(2)(F). In view of all the mitigating and extenuating factors discussed above, we respectfully request that you exercise your oversight authority and grant this appeal of ineligibility, and therefore termination.

In the event that you do not feel able to grant this appeal, we request that it be considered by the TDHCA Board at the next possible Board Meeting.

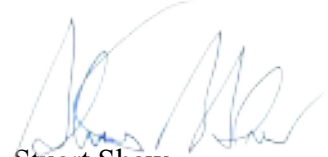
Bobby Wilkinson, Executive Director

April 20, 2020

Page 6

Thank you for considering this appeal. If you have any questions or if you need any additional information, please do not hesitate to call me at 512-220-8000, extension 604.

Sincerely,



Stuart Shaw,
Applicant's Representative

Enclosures – Exhibits A – J

cc: Marni Holloway
Sharon Gamble
Stuart Shaw

EXHIBIT A

Site Feasibility Study
For
CYPRESS CREEK APARTMENT HOMES
AT LA PORTE

10.81 Acre
NEC Airport Blvd. and Spencer Highway
La Porte, Texas

Prepared for:

Cypress Creek La Porte LP
Bonner Carrington
901 Mopac Expressway South
Building V, Suite 100
Austin, Texas 78746

Prepared by:



Texas Registered Engineering Firm No. F-487
16340 Park Ten Place, Suite 350, Houston, Texas 77084

February 2020

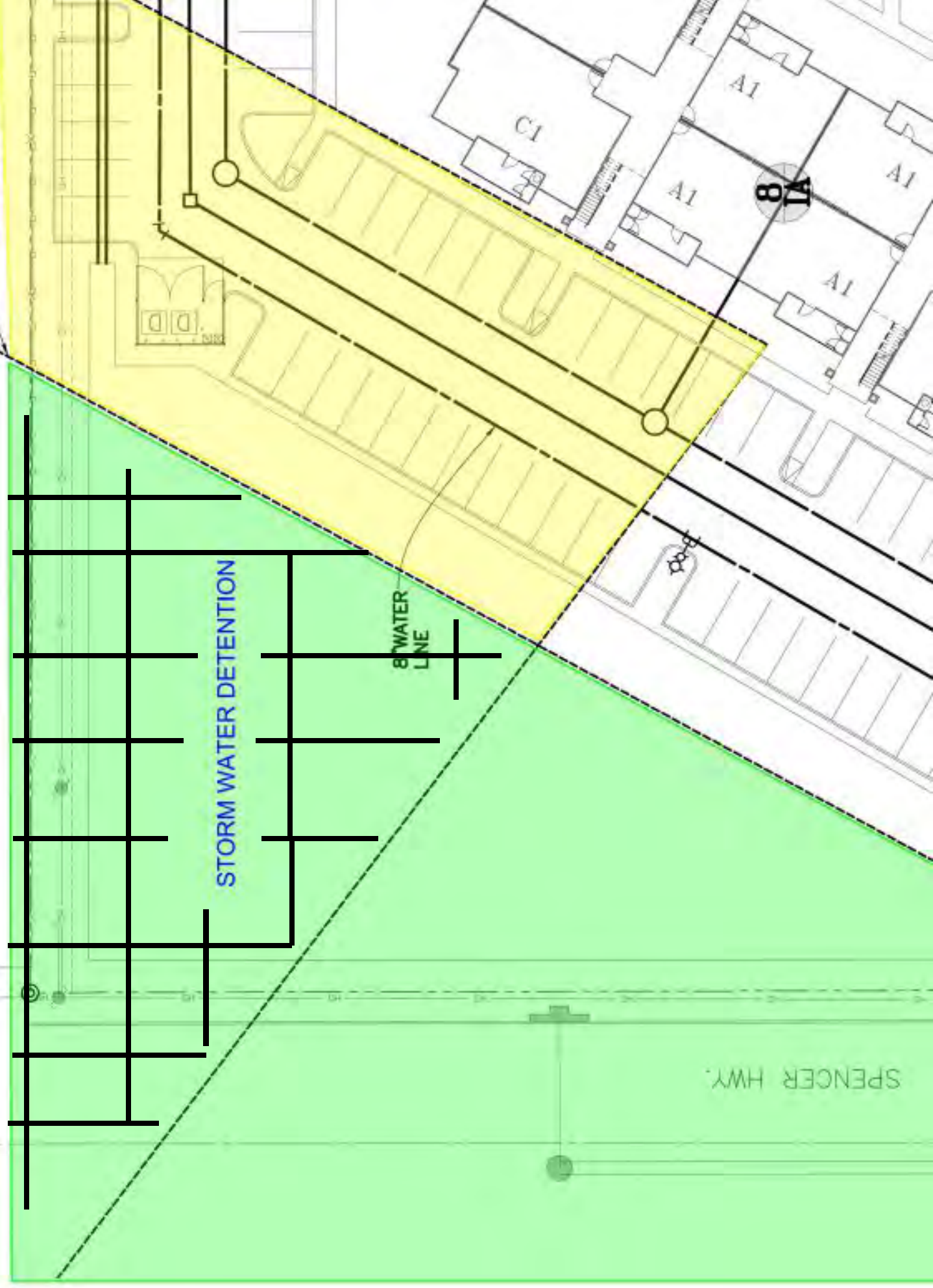
EXHIBIT 17
RUNWAY PROTECTION ZONES

Please see attachments sent to the Applicant from Ray Mayo, Director of Public Works for La Porte. The maps detail both the existing and ultimate Runway Protection Zones (RPZ). A highlighted map is also included to emphasize both zones. No buildings will be placed in these zones.

Existing Runway Protection Zone: This is the RPZ that is currently in effect. No buildings can be placed within these borders.

Ultimate Runway Protection Zone: This RPZ is NOT in effect at the moment. According to Ray Mayo, the lengthening of this RPZ is unlikely, but he cannot confirm on his end as it is a decision to be made on the FAA side.

ULTIMATE R.P.Z. LINE



STORM WATER DETENTION

8\"/>A plan view of a site showing a yellow-shaded parking area at the top, a green-shaded storm water detention area at the bottom, and a building complex on the right. The parking area contains several stalls and a building labeled 'C1'. The building complex includes several units labeled 'A1' and a central area labeled '8'. A dashed line separates the parking area from the building complex. A solid line labeled '8\"/>

SPENCER HWY.

EXHIBIT B

Cypress Creek La Porte LP

February 28, 2020

Texas Department of Housing and Community Affairs
221 E. 11th Street Austin, TX 78701
Attn: Marni Holloway, Director of Multifamily Finance

RE: Runway Protection Zones Certification for Cypress Creek Apartment Homes at La Porte (TDHCA Application No. 20318)

Cypress Creek La Porte LP ("Applicant") is proposing to develop Cypress Creek Apartment Homes at La Porte, an affordable rental housing development that will be located at Northwest of Spencer Highway and Airport Boulevard, Houston, Harris County, TX 77571 ("Development Site"). The Applicant certifies the following:

1. In accordance with §11.101(a)(2)(H) of the QAP, there will be no buildings located in the Runway Protection Zones.

La Porte Municipal Airport has an Existing and Ultimate Runway Protection Zone that encroach onto the Development Site. While these zones are marked in the attached site plan, no buildings will be placed in them.

Feel free to reach out to us with any questions.

Sincerely,

Cypress Creek La Porte LP

By:

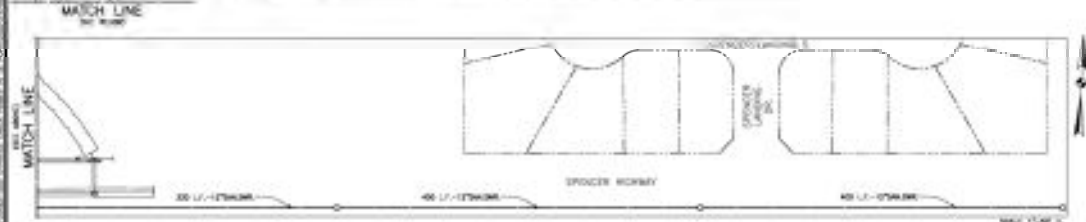


Name:

Stuart Shaw

Title:

Applicant's Representative



NOTES:
 1. REFER TO ALL OTHER SHEETS OF THIS SET FOR ALL NOTES AND SPECIFICATIONS.
 2. ALL DIMENSIONS ARE IN FEET AND INCHES.
 3. ALL DIMENSIONS ARE TO FACE UNLESS OTHERWISE NOTED.
 4. ALL DIMENSIONS ARE TO CENTERLINE UNLESS OTHERWISE NOTED.
 5. ALL DIMENSIONS ARE TO THE CENTERLINE OF THE ROAD UNLESS OTHERWISE NOTED.
 6. ALL DIMENSIONS ARE TO THE CENTERLINE OF THE CURB UNLESS OTHERWISE NOTED.
 7. ALL DIMENSIONS ARE TO THE CENTERLINE OF THE SIDEWALK UNLESS OTHERWISE NOTED.
 8. ALL DIMENSIONS ARE TO THE CENTERLINE OF THE PLAZA UNLESS OTHERWISE NOTED.
 9. ALL DIMENSIONS ARE TO THE CENTERLINE OF THE DRIVEWAY UNLESS OTHERWISE NOTED.
 10. ALL DIMENSIONS ARE TO THE CENTERLINE OF THE PARKING SPACE UNLESS OTHERWISE NOTED.

LEGEND

SYMBOL	DESCRIPTION
(Symbol)	DRIVE DRIVE
(Symbol)	DRIVE DRIVE
(Symbol)	DRIVE DRIVE
(Symbol)	DRIVE DRIVE DRIVE
(Symbol)	DRIVE DRIVE DRIVE
(Symbol)	DRIVE DRIVE DRIVE

LA PORTE MULTI-FAMILY DEVELOPMENT
SITE PLAN EXHIBIT
 e.g. miller engineers
 1000 Park The View
 Suite 200
 Houston, Texas 77056
 (713) 461-9900
 Fax: (713) 461-9901
 www.e-gmiller.com

EXHIBIT C



Mail Processing Center
 Federal Aviation Administration
 Southwest Regional Office
 Obstruction Evaluation Group
 10101 Hillwood Parkway
 Fort Worth, TX 76177

Aeronautical Study No.
 2020-ASW-1613-OE

Issued Date: 03/25/2020

Stuart Shaw
 Bonner Carrington
 901 S. Mopac Expy., Bldg. 5, Ste. 100
 Austin, TX 78746

**** DETERMINATION OF NO HAZARD TO AIR NAVIGATION ****

The Federal Aviation Administration has conducted an aeronautical study under the provisions of 49 U.S.C., Section 44718 and if applicable Title 14 of the Code of Federal Regulations, part 77, concerning:

Structure:	Building Apartment Buildings
Location:	La Porte, TX
Latitude:	29-39-57.57N NAD 83
Longitude:	95-03-23.66W
Heights:	22 feet site elevation (SE)
	40 feet above ground level (AGL)
	62 feet above mean sea level (AMSL)

This aeronautical study revealed that the structure would have no substantial adverse effect on the safe and efficient utilization of the navigable airspace by aircraft or on the operation of air navigation facilities. Therefore, pursuant to the authority delegated to me, it is hereby determined that the structure would not be a hazard to air navigation provided the following condition(s) is(are) met:

As a condition to this Determination, the structure is to be marked/lighted in accordance with FAA Advisory circular 70/7460-1 L Change 2, Obstruction Marking and Lighting, red lights - Chapters 4,5(Red),&12.

Any failure or malfunction that lasts more than thirty (30) minutes and affects a top light or flashing obstruction light, regardless of its position, should be reported immediately to (877) 487-6867 so a Notice to Airmen (NOTAM) can be issued. As soon as the normal operation is restored, notify the same number.

It is required that FAA Form 7460-2, Notice of Actual Construction or Alteration, be e-filed any time the project is abandoned or:

- At least 10 days prior to start of construction (7460-2, Part 1)
- Within 5 days after the construction reaches its greatest height (7460-2, Part 2)

See attachment for additional condition(s) or information.

This determination expires on 09/25/2021 unless:

- (a) the construction is started (not necessarily completed) and FAA Form 7460-2, Notice of Actual Construction or Alteration, is received by this office.
- (b) extended, revised, or terminated by the issuing office.
- (c) the construction is subject to the licensing authority of the Federal Communications Commission (FCC) and an application for a construction permit has been filed, as required by the FCC, within 6 months of the date of this determination. In such case, the determination expires on the date prescribed by the FCC for completion of construction, or the date the FCC denies the application.

NOTE: REQUEST FOR EXTENSION OF THE EFFECTIVE PERIOD OF THIS DETERMINATION MUST BE E-FILED AT LEAST 15 DAYS PRIOR TO THE EXPIRATION DATE. AFTER RE-EVALUATION OF CURRENT OPERATIONS IN THE AREA OF THE STRUCTURE TO DETERMINE THAT NO SIGNIFICANT AERONAUTICAL CHANGES HAVE OCCURRED, YOUR DETERMINATION MAY BE ELIGIBLE FOR ONE EXTENSION OF THE EFFECTIVE PERIOD.

This determination is subject to review if an interested party files a petition that is received by the FAA on or before April 24, 2020. In the event a petition for review is filed, it must contain a full statement of the basis upon which it is made and be submitted to the Manager of the Airspace Policy Group. Petitions can be submitted via mail to Federal Aviation Administration, 800 Independence Ave, SW, Room 423, Washington, DC 20591, via email at OEPetitions@faa.gov, or via facsimile (202) 267-9328.

This determination becomes final on May 04, 2020 unless a petition is timely filed. In which case, this determination will not become final pending disposition of the petition. Interested parties will be notified of the grant of any review. For any questions regarding your petition, please contact Airspace Policy Group via telephone – 202-267-8783.

This determination is based, in part, on the foregoing description which includes specific coordinates, heights, frequency(ies) and power. Any changes in coordinates, heights and frequencies or use of greater power, except those frequencies specified in the Colo Void Clause Coalition; Antenna System Co-Location; Voluntary Best Practices, effective 21 Nov 2007, will void this determination. Any future construction or alteration, including increase to heights, power or the addition of other transmitters, requires separate notice to the FAA. This determination includes all previously filed frequencies and power for this structure.

If construction or alteration is dismantled or destroyed, you must submit notice to the FAA within 5 days after the construction or alteration is dismantled or destroyed.

This determination does include temporary construction equipment such as cranes, derricks, etc., which may be used during actual construction of the structure. However, this equipment shall not exceed the overall heights as indicated above. Equipment which has a height greater than the studied structure requires separate notice to the FAA.

This determination concerns the effect of this structure on the safe and efficient use of navigable airspace by aircraft and does not relieve the sponsor of compliance responsibilities relating to any law, ordinance, or regulation of any Federal, State, or local government body.

This aeronautical study considered and analyzed the impact on existing and proposed arrival, departure, and en route procedures for aircraft operating under both visual flight rules and instrument flight rules; the impact on all existing and planned public-use airports, military airports and aeronautical facilities; and the cumulative impact resulting from the studied structure when combined with the impact of other existing or proposed

structures. The study disclosed that the described structure would have no substantial adverse effect on air navigation.

An account of the study findings, aeronautical objections received by the FAA during the study (if any), and the basis for the FAA's decision in this matter can be found on the following page(s).

If we can be of further assistance, please contact Andrew Hollie, at (817) 222-5933, or andrew.hollie@faa.gov. On any future correspondence concerning this matter, please refer to Aeronautical Study Number 2020-ASW-1613-OE.

Signature Control No: 429873603-434550479

(DNH)

Mike Helvey

Manager, Obstruction Evaluation Group

Attachment(s)

Additional Information

Case Description

Map(s)

Additional information for ASN 2020-ASW-1613-OE

Abbreviations

AGL - Above Ground Level MSL - Mean Sea Level nm - nautical mile

DER - Departure end of runway

Part 77 - Title 14 CFR Part 77, Safe, Efficient Use and Preservation of the Navigable Airspace

Our study has disclosed that this proposed project, located approximately .44 nm southeast, is within the protected surfaces at La Porte Municipal Airport (T41), TX.

At the proposed height, this structure will penetrate these protected airport surfaces:

> 77.17 (a)(3) A height within a terminal obstacle clearance area, including an initial approach segment, a departure area, and a circling approach area, which would result in the vertical distance between any point on the object and an established minimum instrument flight altitude within that area or segment to be less than the required obstacle clearance.

AT 62 AMSL, 4D, LA PORTE MUNI (T41), LA PORTE, TX. Obstacle penetrates RWY 12 Initial Climb Area (ICA) 24 feet. Qualifies as low, close-in penetration with climb gradient termination altitude 200 feet or less above DER, requiring TAKE-OFF MINIMUM AND (OBSTACLE) DEPARTURE PROCEDURES, NOTE: RWY 12, Building 583 feet from departure end of runway, 517 feet LEFT of centerline, 40 AGL, 62 AMSL, NEH 39 AMSL (4D/2C). Exceeds by 24 feet.

The proposal was not circularized to the public for comments, as current FAA policy exempts from circularization those proposals which penetrate the 40:1 departure surface and do not raise minima. The penetration to the departure surface in the ICA will require a note in the TAKE-OFF MINIMUM AND (OBSTACLE) DEPARTURE PROCEDURES AND DIVERSE VECTOR AREA (RADAR VECTORS).

> The proposed structure would have no effect on any existing or proposed IFR arrival/departure routes, operations, or procedures. A P-NOTAM will be submitted for the departure note once the 7460-2 Part 1 is received.

> The proposed structure would have no effect on any existing or proposed IFR en route routes, operations, or procedures.

> The proposed structure would have no effect on any existing or proposed IFR minimum flight altitudes.

AERONAUTICAL STUDY FOR POSSIBLE VISUAL FLIGHT RULES (VFR) EFFECT DISCLOSED THE FOLLOWING:

> The proposed structure would have no effect on any existing or proposed VFR arrival or departure routes, operations or procedures.

> The proposed structure would not conflict with airspace required to conduct normal VFR traffic pattern operations at any known public use or military airports.

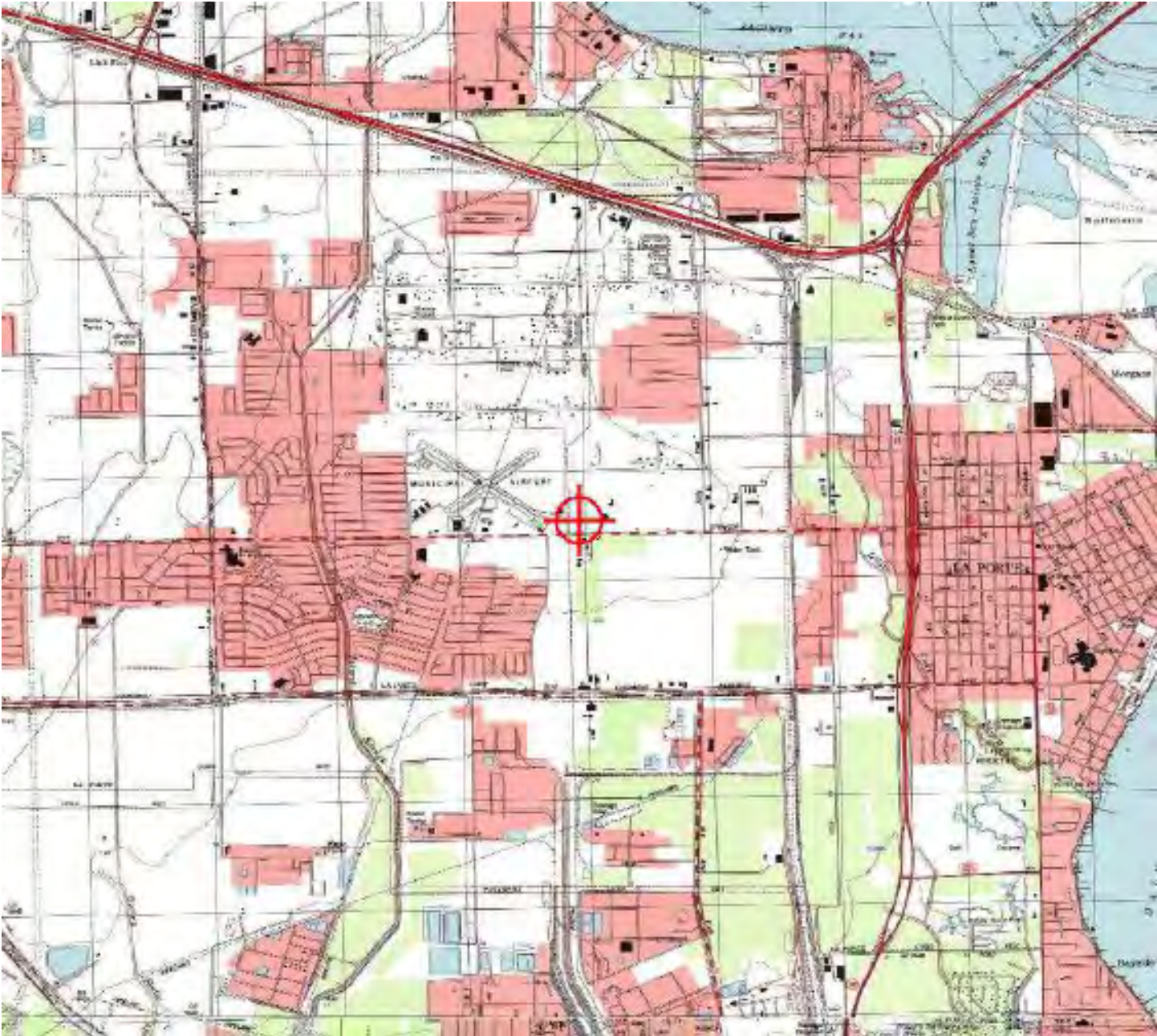
> The proposed structure would not penetrate those altitudes normally considered available to airmen for VFR en route flight.

> **ABSOLUTELY MANDATORY:** The proposed structure will be appropriately obstruction marked and lighted to make it more conspicuous to airmen flying in VFR weather conditions at night.

The cumulative impact of the proposed structure is not considered significant. Study did not disclose any adverse effect on existing or proposed public-use or military airports or navigational facilities. Nor would the proposal affect the capacity of any known existing or planned public-use or military airport.

Therefore, it is determined that the proposed structure would not have a substantial adverse effect on the safe and efficient utilization of the navigable airspace by aircraft or on any air navigation facility and would not be a hazard to air navigation.

Aeronautical study



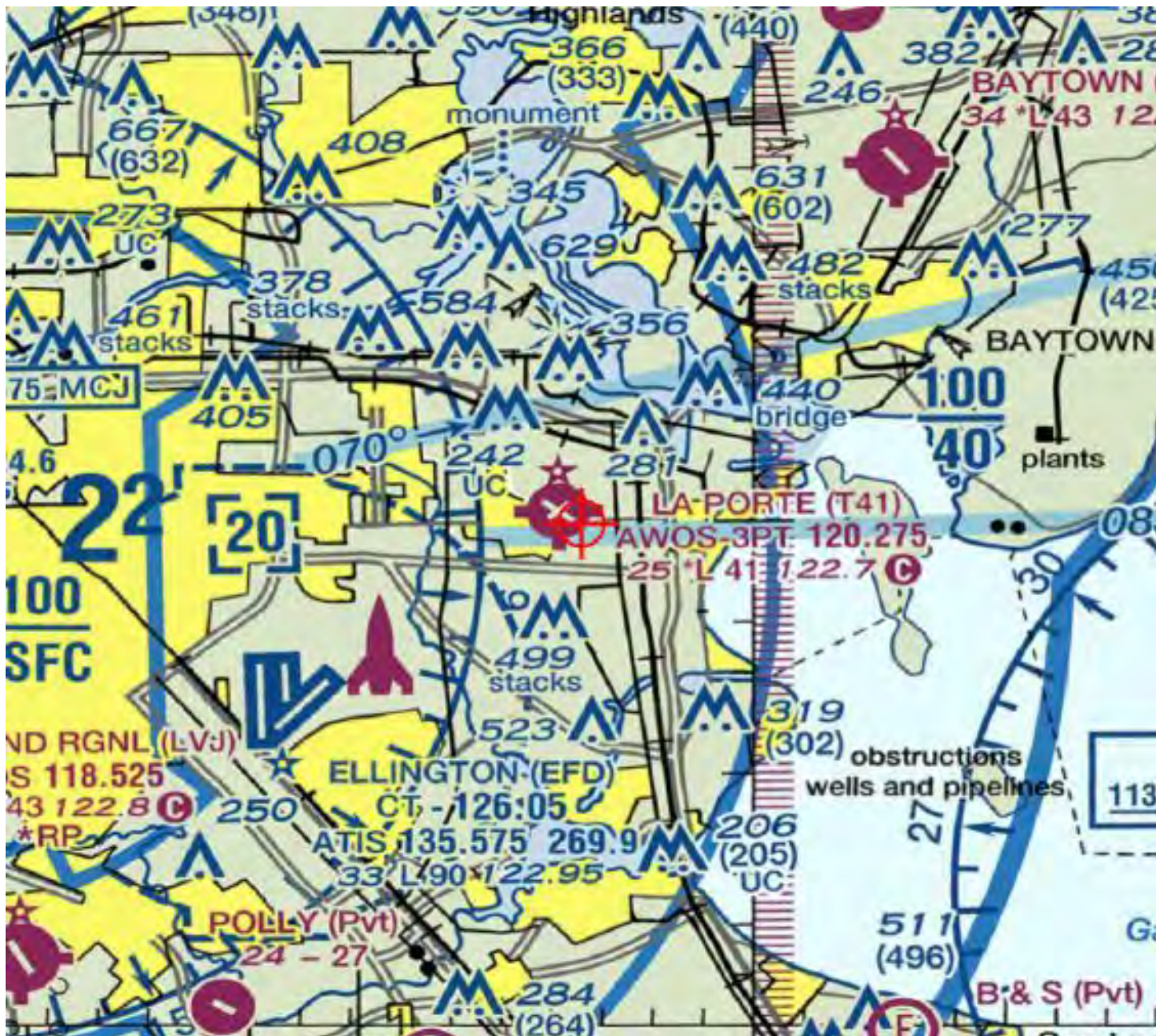


EXHIBIT D



Flight Light Inc.
2708 47th Ave.
Sacramento, California, U.S.A.
95822-3806



PH (916) 394-2800 FX (916) 394-2809
TF (800) 806-3548 EM info@flightlight.com

Obstruction Lights FAA L-810

Compliance

FAA AC: 150/5345-43H

ETL Certified L-810

ICAO Annex 14, Vol. 1, Type B

Flight Light L-810 obstruction lights are used on buildings, antennas, towers, cranes, and any other kind of obstacle which occupies airspace. Each fixture includes a glass Fresnel globe which is colored red for most applications. The fixtures are either a single or a double lamp housing and made with 3/4" or 1" internally threaded housing. A side-mounted option is also available. These obstruction lights operate on a 120V or 230V circuit. The fixture is illuminated with a 116W, A21 medium screw base lamp.

Features

- FAA approved L-810, certified and tested by ETL with a red lens and 116W lamp #32B.
- Direct installation into existing voltage power circuit.
- Direct mounting to conduit, bottom or side mounting options available.
- Standard configurations come with 3/4" threaded fittings.
- Photocell option for automatic activation at night.
- Optional grounding wire available.

Common Replacement Parts

P/N	Description
13-861R-T	Red globe with tether
61-80001	Clamp band
61-80004	Medium base socket
LA-22483-2	116W, 120V lamp
LA-116W/230V	116W, 230V lamp
61-80002	O-ring



Double
Obstruction
Light with
Photocell



Single Obstruction
Light with optional
Low Surface Mount
(11.25" overall height)



Single Obstruction Light
with Riser, Frangible
Coupling and Floor Flange
(14" overall height)

Ordering Codes

Fixture	Color	Power	Fixture Style	Mounting	Options
FL-810	R: Red	AC1: 120VAC AC2: 230VAC ¹	S: Single D: Double	34B: 3/4" Hub - Bottom 10B: 1" Hub - Bottom 34S: 3/4" Hub - Side 10S: 1" Hub - Side FF: Floor Flange LSM: Low Surface Mount ²	F: Flasher ³ MT: Marine Treated P: Photocell (81020 Series) R: Red Casting T: Transfer Relay

¹ Not FAA Approved. ² For single option only. ³ Flasher not available for 277VAC.

Shipping Weight: (Single): 4.5 lb./2 kilo., Volume: 0.5 cu. Feet/0.01 cu. Meters; (Double): 10 lb./4.5 kilo., Volume: 1 cu. Feet/0.02 cu. Meters.

Casting Options:



Red

Marine
Treated

Visit our web site: www.flightlight.com



Flight Light Inc.
 2708 47th Ave.
 Sacramento, California, U.S.A.
 95822-3806



PH (916) 394-2800 FX (916) 394-2809
TF (800) 806-3548 EM info@flightlight.com

Obstruction Lighting Controls

Obstruction Lighting Controls

Lighting controls are designed for use when multiple obstruction light fixtures are to be controlled with common electronics or when alarms or transfer relay circuits must be switched remotely from the fixture. The electronic control module comes in a cast iron device box with threaded hubs on both top and bottom. Replacement modules (controls without device box) are also available upon request. Photocell options, available for models 81001 and 81002, are built into the cast iron device box.

Flasher

Model 81001 120VAC, 2500W, 30 FPM flasher. Includes circuitry to reduce EMI for sensitive RF locations. Beacon tower flasher. FAA approved.

Model 81002 120-240VAC, 2400W flasher. Adjustable rate flasher, 10-100 FPM.

Lamp Alarm/Transfer Relay

Model 81010 120VAC lamp alarm or transfer relay module. Monitors current for one to four 116W fixtures or one L-864 fixture with two 620W lamps. If any fixtures are detected out, 120VAC (1A) output and a 10A isolated relay (SPDT) are activated. Can be used as a transfer relay with isolated alarm for double obstruction fixtures with one primary and one standby lamp. For Buzzer option, add '-B' to model number.

Model 81011 120VAC lamp alarm for two to nine steady-burning, incandescent lamps. Monitors current for two to nine 116W fixtures. If any fixtures are detected out, 120VAC (1A) output and 10A isolated relay (SPDT) are activated.

Photocell

Model 81020 120VAC, 1000W photocell. FAA style photocells activate at 35 ft-cd and turn off at 58 ft-cd. A 45 second time delay prevents activation and de-activation from momentary light conditions. Does not come with device box, includes 1/2" threaded male fitting.

Model 81021 120VAC, 4800W photocell. Meets FAA/FCC requirements for obstruction lighting. Energized at 35 ft-cd and de-energized at 60 ft-cd. Time delay eliminates contact chatter. Contains dual 20A load contacts. Front plastic housing mounts to cast aluminum junction box (included).

Model 81022 Hazardous Location Photocontrol Unit. Outdoor lighting control for exterior lighting in hazardous locations: explosion proof, dust-ignition proof, and weatherproof. Nominal Voltage 50/60 Hz: 120/208/240/277. Voltage Range: 105-305. Housing: sand cast copper-free aluminum - epoxy powder coated.



Model 81001



Model 81010



Model 81020



Model 81021



Model 81022

Obstruction Lighting Controls

Fixture Type	Model
FL-	81001: HP Flasher (120VAC, 2500W)
	81002: MP Flasher (adj. 10 amps)
	81010: 1-4 Lamp Alarm/Transfer Relay (Buzzer option '-B')
	81011: 2-9 Lamp Alarm (steady-burning incandescent)
	81020: Photocell only (120VAC, 1000W max)
	81021: Photocell with aluminum box (120VAC, 4800W max)
	81022: Hazardous Location Photocontrol Unit

Visit our web site: www.flightlight.com

EXHIBIT E



February 19, 2020

Cypress Creek La Porte LP

c/o Bonner Carrington

Attn: Stuart Shaw

901 S. Mopac Expressway

Building V, Suite 100

Austin, TX 78746

Re: Zoning Verification Letter Request for the proposed Cypress Creek Apartment Homes at 11311 Spencer Hwy

To Whom It May Concern:

In response to your requested zoning verification, please be advised of the following:

As shown below as Exhibit A, the subject property and proposed Cypress Creek Apartment Homes at La Porte is zoned High Density Residential (R-3) and is subject to the use and development standards of that zoning district.

This Development is permitted under Chapter 106 (Zoning) of the City of La Porte's Code of Ordinances. The R-3 high density residential district is the highest density residential district. Its principal purpose is to provide a wide variety of dwelling types including single-family dwellings, multiple-family dwellings, garden apartments, condominiums and townhouses.

Please be aware that Zoning Verification Letters (ZVL) are intended to provide official documentation of the zoning of a property at the time of correspondence.

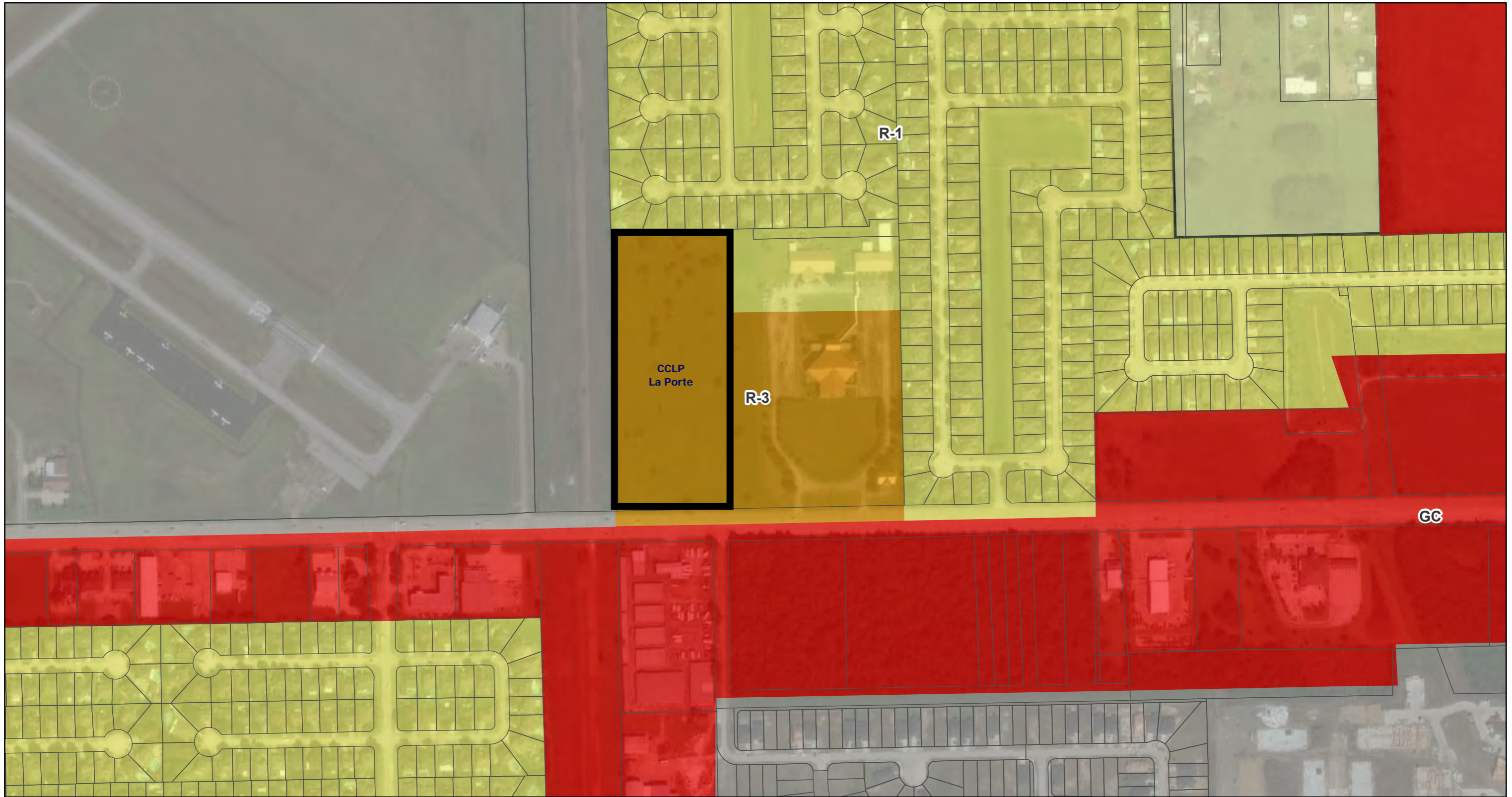
I can also confirm that I am a local government official with appropriate jurisdiction over the proposed development. If you have any questions or concerns, please contact me at 281-470-5065 or

StewartC@laportetx.gov

Sincerely,

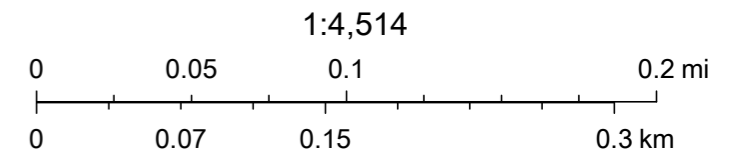
Chase Stewart – Planning Technician

CCLP La Porte Zoning Map



4/19/2020, 7:41:10 PM

- | | | |
|------------------------------------|-------------------------|--------------------------|
| Base Map Layer - City Limits | Land Use Layer - Zoning | High Density Residential |
| Parcel Layer - City Limits Parcels | Large Lot Residential | General Commercial |
| Morgan's Landing Lots | Low Density Residential | Planned Unit Development |



Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

EXHIBIT F



San Jacinto College Central
Community college
8060 Spencer Hwy
Pasadena, TX 77505

(281) 476-1501
sanjac.edu

3.9 147
Reviews

Line Path Polygon Circle 3D path 3D polygon

Measure the distance between two points on the ground

Map Length: 3.54 Miles

Ground Length: 3.54

Heading: 264.41 degrees

Mouse Navigation Save Clear

Google Earth

Aerial View

Pipeline Corridor

Proposed Site

Spencer Highway

Legend

- Unique Farm and Ranch
- 🏠 Bayshore Baptist Church
- 🎓 Bayshore Learning Center
- 🏠 Feature 1
- 📍 H & R Aviation
- 🏥 Jacinto Medical Group

Google Earth

© 2020 Google
© 2020 Earthstar Technologies
© 2020 Google

1000 ft



EXHIBIT G



City of La Porte

Established 1892

City Manager's Office

The City of La Porte embraces our heritage, community values and opportunities, while enhancing the quality of life for our citizens.

February 24, 2020

Ms. Marni Holloway
Director of Multifamily Finance
Texas Department of Housing and Community Affairs
221 E. 11th Street
Austin, TX 78701

RE: Cypress Creek Apartment Homes at La Porte (TDHCA #20318)

Dear Ms. Holloway,

Please accept this memo as acknowledgement of the name change Cypress Creek Apartment Homes at Spencer Landing (TDHCA #20318) with applicant Cypress Creek Spencer Land LP, as referenced in the following documents, is now referenced as Cypress Creek Apartment Homes at La Porte (TDHCA #20318) with applicant Cypress Creek La Porte LP. The modification was made at the request of the community and is merely an administrative change on our end at this time. There is no change to the location, TDHCA number, etc.

- Resolution of Support Resolution No. 2020-04
- Commitment of Development Funding Letter dated February 24, 2020

If you have any questions please let us know.

Sincerely,

Corby D. Alexander
City Manager

RESOLUTION NO. 2020-04

A RESOLUTION OF THE CITY COUNCIL OF LA PORTE, TEXAS, REGARDING SUPPORT FOR CYPRESS CREEK APARTMENT HOMES AT SPENCER LANDING (TDHCA# 20318).

WHEREAS, Cypress Creek Spencer Landing, LP (the Applicant) has proposed a development for an apartment home community to be located at approximately the northeast quadrant of Spencer Highway and Airport Boulevard, La Porte, Harris County, Texas; to be named Cypress Creek Apartment Homes at Spencer Landing (the Development); and

WHEREAS, the Applicant has advised that it intends to submit an application to the Texas Department of Housing and Community Affairs (TDHCA) in the 2020 competitive 9% application round for Housing Tax Credits and TDHCA HOME Funds for the Development;

NOW, THEREFORE, IT IS HEREBY RESOLVED, that the City of La Porte, Texas, acting through its governing body, hereby confirms that it supports the aforementioned proposed Development, and the related application to the TDHCA (#20318); and

FURTHER RESOLVED, that the City intends to issue a commitment and letter confirming that the City will provide reduced fees for the benefit of the Development so that the Applicant may receive one (1) point for a contribution from the City in an amount of \$500.00 or more; and

FURTHER RESOLVED, that the City of La Porte hereby supports the proposed Development, and confirms that its governing body has voted specifically to approve the construction of the Development and to authorize an allocation of Housing Tax Credits for the Development pursuant to Texas Government Code §2306.6703(a)(4); and

FURTHER RESOLVED that for and on behalf of the City of La Porte, Mayor Louis Rigby, are hereby authorized, empowered, and directed to certify this resolution to the TDHCA. This formal action has been taken to put on record the opinion expressed by the City of La Porte on February 24, 2020.

NOW, THEREFORE, BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF LA PORTE, TEXAS, as follows:

Section 1. The facts and opinions in the preamble of this resolution are true and correct.

Section 2. The City of La Porte, Harris County, has voted specifically to support the Development and to authorize, if awarded by the Texas Department of Housing and Community Affairs, an allocation of Housing Tax Credits and authorized Applicant to apply on behalf of the City for HOME funds for the Development.

Section 3. This resolution, related to potential financing, is not a statement of approval for site or building permits, zoning, or PUD; as such decision shall be made in due course with a future request.

Section 4. All resolutions and agreements or portions of resolutions and agreements in conflict herewith are hereby released to the extent of the conflict only.

PASSED AND APPROVED by the City Council of the City of La Porte, Texas, on February 24, 2020.

CITY OF LA PORTE, TEXAS


Louis R. Rigby, Mayor

APPROVED AS TO FORM:


Clark T. Askins, City Attorney

ATTEST:


Lee Woodward, City Secretary

EXHIBIT H

February 25, 2020

via e-mail
Hard copy via
USPS

Stuart Shaw, Applicant's Representative
Cypress Creek La Porte LP
Building V, Suite 100
901 MoPac Expressway
Austin, TX 78746

Re: Pipelines and Informed Planning Alliance (PIPA) Review
Proposed Cypress Creek Apartment Homes at La Porte (TDHCA #20318)
La Porte (Harris County), Texas 77571

Dear Mr. Shaw:

Per your request, the purpose of this report is to address, from a PIPA perspective, issues regarding pipelines in the vicinity of the site of the proposed development – more specifically the pipelines in the pipeline corridor between the proposed site and the La Porte Municipal Airport. The majority of the pipelines are listed as intrastate lines by the Railroad Commission of Texas (RRC). See the attached list of Pipelines Potentially Affecting the Proposed Cypress Apartment Homes at La Porte (the List), the attached RRC Pipeline Map (RRC Map), and the attached Preliminary Site Plan.

It is my understanding that Cypress Creek La Porte LP (CCLP) is generally familiar with PIPA and you have assured me that CCLP will comply with the relevant PIPA recommended practices. The purpose of this initial report is to clarify the potential impact of the "worst-case scenario" pipelines and to identify mitigating measures consistent with PIPA. Before getting to the worst-case scenario pipelines, the applicable U.S. Department of Housing and Urban Development (HUD) should be addressed.

HUD Requirements

The HUD Multifamily Accelerated Processing (MAP) Guide (November 23, 2011) had a requirement that stated:

"1. All parts of any structure must be at least 10 feet from the outer boundary of the easement for any high pressure gas or liquid petroleum transportation pipeline (Form HUD-4128, Part B, No. 28)." (Chapter 9, Environmental Review and Requirements, Environmental Report, Chapter page 29 of 30, Document page 289)

The most recent revision of the MAP Guide (January 29, 2016) replaced the foregoing paragraph with:

"1. Reference for equations and methodology to calculate acceptable separation from high pressure pipelines transferring flammable and combustible liquids and gases is the Final report from ICF International, September 17, 2012, 'Research to Support U.S. Department of Housing and Urban Development Regulation 24 CFR Part 51 Subpart C, Siting of HUD-Assisted Projects Near Hazardous Operations Handling Conventional Fuels or Chemicals of an Explosive or Flammable Nature.'" (Chapter 9, page 338 of 534)

Under 24 CFR Part 51 Subpart C, "Hazard - means any stationary container which stores, handles or processes hazardous substances of an explosive or fire prone nature. The term 'hazard' does not include pipelines for the transmission of hazardous substances, if such pipelines are located underground or comply with applicable Federal, State and local safety standards." (emphasis added, 24 CFR §51.201 Definitions) There are other exclusions that are not relevant to this discussion.

All of the pipelines discussed in this determination are located underground and appear to comply with applicable Federal, State and local safety standards. Therefore, none are considered hazards by HUD for purposes of acceptable separation distance.

Worst-Case Scenario Pipelines

Based on my inspection of the proposed site (January 17, 2020), there are no pipelines actually on the site. That said, there is a major pipeline corridor (easement) immediately west of the proposed site. During my visual inspection of the site, I counted over forty lines with pipeline markers and photographed examples associated with each individual pipeline operator. Subsequent to my site inspection, I reviewed the RRC map and was able to identify 34 different pipelines. I used the 34 pipelines to develop the List. There are both hazardous liquid (49 CFR Part 195) pipelines and gas (49 CFR Part 192) pipelines present in the pipeline corridor. Not all of the lines are subject to regulation. Unregulated lines in the corridor include, for example, at least one pipeline that has been abandoned, one pipeline that is considered "idle" by the operator of that line (still subject to regulation but of relatively little risk), one line is listed as containing oxygen (not subject to Part 192), and one line containing nitrogen (also not subject to Part 192).

The pipeline markers (a marker is required for each individual pipeline), were, with few exceptions, in generally excellent condition. The corridor itself is very well maintained. Gas transmission pipelines must be patrolled at road crossings (Spencer Highway) at least twice each calendar year to observe surface conditions on and adjacent to the right-of-way for indications of leaks, construction activity, and other factors affecting safety and operation (49 CFR §192.705). Hazardous liquid pipelines must be patrolled at least 26 times each calendar year (49 CFR §195.412). Each individual pipeline operator must document that the required patrols have been completed for each pipeline owned by that operator. In essence, the pipeline corridor is under constant surveillance by one or more pipeline operators. Because the pipeline corridor is immediately adjacent to the La Porte Municipal Airport, it is extremely unlikely that a landing or departing pilot could fail to observe or report any unusual events occurring within the corridor.

Pipeline worst-case scenarios are generally catastrophic failures of large-diameter, high-pressure pipelines that catch fire. For gas pipelines, a calculation of distance that could be affected by a fire associated with the rupture of a gas pipeline is typically used. By far the largest diameter gas pipeline (and, coincidentally, the Part 192 pipeline that is nearest to the proposed site), is a 20" hydrogen line with a Maximum Allowable Operating Pressure (MAOP) of 1100 psi. This particular line is owned and operated by Air Liquide (PHMSA OPID 842, Tx RRC T-4 Permit No. 08275). The Potential Impact Radius for this pipeline line will be calculated below.

The largest hazardous liquid pipeline in the corridor is a soon-to-be-installed 36" crude line that will be the pipeline that is nearest to the proposed site when it is completed. This pipeline will be owned and operated by Mobil Pipeline Company (PHMSA OPID 12628, Tx RRC Permit T-4 No. 10153).

Finally, there is a subset of hazardous liquids called Highly Volatile Liquids (HVLs). HVLs will form a vapor cloud when released to the atmosphere. There are two 18" HVL lines in the corridor. The 18" HVL line nearest to the proposed site is owned and operated by Enterprise Products (PHMSA OPID 31618, Tx RRC T-4 Permit No. 07403) and contains HVLs (probably propane). This is the line that will be addressed for the HVL worst-case scenario.

The 20" Air Liquide Hydrogen Pipeline

A key element of the Gas Integrity Management Rule (49 CFR Part 192, Subpart O) is the calculation of the potential impact radius (PIR) of a circle within which the potential failure of a pipeline could have significant impact on people or property due to thermal effects.

The original derivation of the PIR formula referenced in 49 CFR 192 is contained in the Gas Research Institute report by C-FER Technologies (C-FER Report), "*A Model for Sizing High Consequence Areas Associated with Natural Gas Pipelines*" (Stephens 2000). The C-FER Report was based on the premise that high consequence area could be defined as the area within which both the extent of property damage and the chance of serious or fatal injury would be expected to be significant, it follows that this area could be reasonably be defined by a heat intensity contour corresponding to a threshold value below which:

- property, as represented by a typical wooden structure, would not be expected to ignite and burn;
- people located indoors at the time of failure would likely be afforded indefinite protection; and
- people located outdoors at the time of failure would be exposed to a finite but low chance of fatality.

According to the C-FER Report, for a thermal load at or below 5,000 Btu/hr ft², a wooden structure would not be expected to burn and would therefore provide indefinite protection to occupants. Furthermore, 5,000 Btu/hr ft² corresponds to approximately a 1 percent chance of fatality for persons exposed for a credible period of time before reaching shelter.

The C-FER formula incorporated into 49 CFR Part 192, Subpart O for the calculation of the PIR used for natural gas is:

$$r = 0.69 \cdot \sqrt{p \cdot d^2}$$

where:

r = the PIR in feet,

p = the pipeline maximum operating pressure in pounds per square inch, and

d = the nominal pipeline diameter in inches.

Note that 0.69 is the PIR factor derived for natural gas. This number varies for other gases depending upon their heat of combustion. (49 CFR §192.903). The derived PIR factor for hydrogen (0.47) is provided in Table 7.1, page 47 of the US Department of Transportation's Pipeline and Hazardous Materials Administration's ((PHMSA's) Technical Task Order Number 13, "*Potential Impact Radius Formulae for Flammable Gases Other Than Natural Gas*" (TTO-13, Michael Baker Jr., Inc., June 2005). The PIR for the 20" Air Liquide hydrogen line is therefore 312 feet:

PIR Factor For Hydrogen	Nominal Pipe Diameter (inches)	Pressure (MAOP in psig)	Potential Impact Radius (in feet)
0.47	20	1100	312

Because flame resistant materials will be used for the construction of the buildings and structures and egress will be provided on the sides of structures opposite the pipeline corridor, a 50-foot setback from the nearest 49 CFR Part 192 pipeline (the Air Liquide line) should be adequate.

The 36" Mobil Pipeline Company Crude Pipeline

The concept of Potential Impact Radius does not apply to 49 CFR Part 195 (Hazardous Liquid) Pipelines. 49 CFR Part 194, Response Plans for Onshore Oil Pipelines, applies only to onshore oil pipelines that, because of their location, could reasonably be expected to cause substantial harm, or significant and substantial harm to the environment by discharging oil into or on any navigable waters of the United States or adjoining shorelines. (emphasis added). The most significant such pipeline that could potentially affect the site will be the Mobil Pipeline Company 36" crude transmission line that has been permitted but not yet constructed. This pipeline will use the most current construction techniques and modern materials. This particular pipeline will have a leak detection system as required by 49 CFR §195.452(i)(3): "An operator must have a means to detect leaks on its pipeline system. An operator must evaluate the capability of its leak detection means and modify, as necessary, to protect the high consequence area. An operator's evaluation must, at least, consider, the following factors - length and size of the pipeline, type of product carried, the pipeline's proximity to the high consequence area, the swiftness of leak detection, location of nearest response personnel, leak history, and risk assessment results." The line in question is a new pipeline that is less than 19 miles in total length - it is less difficult to detect leaks in shorter pipelines and 19 miles is relatively short for a 36" diameter pipeline. Because crude is relatively benign and unlikely to catch fire, even if the line were to rupture, the

availability of response personnel in or near La Porte, the excellent access to the pipeline corridor, the frequency of pipeline patrols, and the leak detection system combine to suggest that the potential effects of a catastrophic failure of this pipeline (and other similar, but smaller diameter, crude pipelines in the pipeline corridor) would be primarily ecological as opposed to an immediate and acute threat to humans.

The HVL Pipeline

PHMSA's Technical Task Order Number 1, "Consequences of HVL Releases" (TTO-1, Michael Baker Jr., Inc., December 31, 2002), addresses the impact of releases of propane, butane, liquefied petroleum gases (LPG), ethylene, propylene, and anhydrous ammonia. TTO-1 was based on data from 1990 to 2001 and suggests that reportable accidents associated with HVLs are relatively infrequent (an average of only 6.2 accidents per year for the entire US for the 10-year study period). I can, however, recall only one major HVL incident since 2001, the rupture of a propane line in Carmichael, Mississippi November 1, 2007. (NTSB Accident Report PAR-09/01, PB2009-916501, October 14, 2009). That pipeline was operated by Dixie Pipeline (owned by Enterprise Products Operating LLC – the same company that operates the HVL line in the pipeline corridor near the proposed CCLP site). The damages were substantial, two people were killed, and seven others were injured. Enterprise and Dixie responded appropriately and, to the best of my knowledge, neither have experienced anything close to the consequences since. The conditions in La Porte are considerably different (and better) than they were in Carmichael when that pipeline ruptured.

From TTO-1, "Since these products [HVLs] are heavier than the air, they will tend to collect in low-lying areas, displacing the oxygen in those areas. Non-motile animals or plant species in the HCA may be detrimentally affected by a released vapor cloud, while larger species may be able to flee the cloud. In the event of the ignition of the vapor cloud and subsequent fire or explosion, damage would likely be restricted to the immediate area. The incidental take or death of a species of concern may only be likely in those areas of high species density, such as nesting, roosting or migration sites. It is anticipated that the actions associated with the response and repair would present the greatest risk of harming an HCA. For example, the immediate mobilization of heavy equipment to extinguish a fire or repair a pipeline would be necessary. The timing of this emergency repair may coincide with species migration, nesting, or mating, thereby creating an unavoidable harassment or incidental take of a species or unavoidable harm to sensitive ecosystems."

Because of the flat terrain in the vicinity of the pipeline corridor, a small berm along the western edge of the site should be sufficient to prevent the migration of heavier-than-air vapors to the proposed CCLP apartments. Absent adverse wind conditions, the vapors would migrate to the La Porte Municipal Airport, south across Spencer Highway or north along the pipeline corridor.

Summary of Pipeline Concerns

Pipelines are a fact of life in La Porte. There are numerous single-family dwellings adjacent to the pipeline corridor as well as adjacent to pipelines in the pipeline corridor. There are no pipelines on the site itself and it appears that the yet-to-be installed Mobil 36" crude pipeline that

will be nearest to the site will be approximately 100 feet from the western border of the site. PIPA best practices should mitigate the risks associated with the presence of the pipelines in the pipeline corridor.

Performance Record of the Pipeline Operators

The Texas RRC does not allow public access to enforcement records of intrastate pipeline operators. However, PHMSA has on their web site a report that provides details for significant incidents reported for the state of Texas over the period 2003-2014 ("Texas Significant Incidents Listing"). According to this PHMSA report, there were no reportable pipeline incidents in La Porte from 2010 through 2014.

PIPA Requirements

See attached PIPA Compliance Matrix

Perhaps the single most significant PIPA Recommended practice is ND06 "Require consideration of Pipeline Facilities in Land Development Design." In particular, CCLP will incorporate a minimum setback of at least 50 feet from all pipelines and at least 10 feet from the edge of all easements (whichever is greater). There are no statutory or regulatory setback requirements and PIPA does not prescribe any specific distance. In addition, CCLP will employ flame retardant building materials, appropriate locations of building ingress and egress, and leave all pipeline ROW essentially undisturbed. Hardie Plank siding, brick, stucco, and stone qualify as flame retardant.

Secondary Ingress/Egress

As illustrated on the attached preliminary site plan, in the event of a pipeline incident affecting traffic on Spencer Highway, full access to the site would still be available from the east on Spencer Highway.

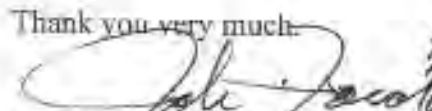
Closing

The proposed configuration of the Cypress Creek Apartment Homes exceeds the HUD MAP Guide requirements including the apparently now removed "10 feet from the outer boundary of the easement for any high-pressure gas or liquid petroleum transportation pipeline" requirement.

This particular development has, from a pipeline perspective, very few issues compared to other projects I have evaluated, each has been or will be addressed by CCLP and, assuming everything happens as planned, implementation of the project appears to meet PIPA guidelines.

I would be happy to discuss this matter via e-mail at jjacobi@csnpe.com or via cell phone at 832-712-3098 at your convenience.

Thank you very much.


John A. Jacobi, P.E., J.D.
Independent Pipeline Consultant

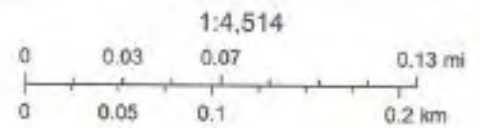


Attachments: Railroad Commission of Texas Map
Aerial View
Preliminary Site Plan
List of Pipelines Potentially Affecting the Cypress Creek La Porte Apartments
PIPA Compliance Matrix
John A Jacobi, P.E. Bio



February 25, 2020

RRC MAP



Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community

Aerial View

Pipeline Corridor

Proposed Site

Google Earth

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2023 Earthstar, Inc. All rights reserved.
2023 Google

Legend

- Aunique Farm and Ranch
- Bayshore Baptist Church
- Bayshore Learning Center
- Feature 1
- H & R Aviation
- Jacinto Medical Group



1000 ft

**Pipelines Potentially Affecting the Cypress Creek La Porte Apartments
La Porte (Harris County) TX 77571**

Operator	Point of Contact	Pipeline
MOBIL PIPE LINE COMPANY (PHMSA OPID 12628) (Tx RRC Permit T-4 No. 10153)	Gautam Singh, Geospatial Systems and Graphics Supervisor 22777 Springwoods Village Parkway E3 4A 611 Spring, TX 77389 Phone: (832) 625-8965 Email: gautam.singh@exxonmobil.com	36" Crude Transmission WEBSTER TO BAYTOWN REFINERY 36 IN CRUDE (new system-T-4 files 12-2-2019, P- 48 filed 8-6-2019)
EXXONMOBIL PIPELINE COMPANY (PHMSA OPID 99329) (Tx RRC Permit T-4 No. 06454)	Gautam Singh, Geospatial Systems and Graphics Supervisor 22777 Springwoods Village Parkway E3 4A 611 Spring, TX 77389 Phone: (832) 625-8965 Email: gautam.singh@exxonmobil.com	6.63" propylene transmission CORRIDOR JUNCTION - FAIRMONT JUNCTION
EXXONMOBIL PIPELINE COMPANY (PHMSA OPID 99329) (Tx RRC Permit T-4 No. 06386)	Gautam Singh, Geospatial Systems and Graphics Supervisor 22777 Springwoods Village Parkway E3 4A 611 Spring, TX 77389 Phone: (832) 625-8965 Email: gautam.singh@exxonmobil.com	6.63" butylene transmission(idle) PETROTEX - JUNCTION BRU TX- 309A EAST TEXAS HYDROGEN SYSTEM
AIR LIQUIDE LARGE INDUST U.S. LP (PHMSA OPID 842) (Tx RRC T-4 Permit No. 08275)	Bobby Skelton, Regulatory Compliance Manager 9811 Katy Freeway #100 Houston, TX 77024 Phone: (713) 438-6351 Email: Bobby.skelton@airliquide.com	20" Hydrogen transmission EAST TEXAS HYDROGEN SYSTEM MAOP = 1100 psig per RRC T-4 files (PS-8000A filed 8-9-2010)
ENTERPRISE PRODUCTS OPERATINGLLC (PHMSA OPID 31618) (Tx RRC T-4 Permit No. 07403)	Public Awareness Department P.O. Box 4324 Houston, TX 77210 Phone: (713) 438-6351 Email: PublicAwareness@eprod.com	18" HVL transmission ANAHUAC JUNCTION TO MORGANS POINT
ENTERPRISE PRODUCTS OPERATINGLLC (PHMSA OPID 31618) (Tx RRC T-4 Permit No. 04541)	Public Awareness Department P.O. Box 4324 Houston, TX 77210 Phone: (713) 438-6351 Email: PublicAwareness@eprod.com	8.63" HVL transmission MCO - TEXAS CITY #26
EXXONMOBIL PIPELINE COMPANY (PHMSA OPID 99329) (Tx RRC Permit T-4 No. 06457)	Gautam Singh, Geospatial Systems and Graphics Supervisor 22777 Springwoods Village Parkway E3 4A 611 Spring, TX 77389 Phone: (832) 625-8965 Email: gautam.singh@exxonmobil.com	6.63" ethylene transmission CORRIDOR JUNCTION - TOTAL TX- 179

Operator	Point of Contact	Pipeline
FLINT HILLS RESOURCES, LC (PHMSA OPID 22855) (Tx RRC Permit T-4 No. 00307)	Public Relations Department 4111 East 37th St. North Wichita, KS 67220 Phone: (316) 828-7082 Email: info@kochpipeline.com	6.63" propylene transmission FHR - HOUSTON CHEMICAL PLANT PROPYLENE
MOTIVA CHEMICALS LLC (Flint Hills Resources?) (PHMSA OPID 22855?) (Tx RRC Permit T-4 No. 00307)	Merle Teeter, Senior Compliance Specialist 3931 Hwy 347 Port Arthur, TX Phone: (409) 273-9482 Email: merle.teeter@fhr.com [See Note 2, below]	8.63" HVL transmission FHR - PORT ARTHUR
PRAXAIR, INC. (Linde) (PHMSA OPID 20044) (Tx RRC Permit T-4 No. 06013)	John Maitino, Pipeline Compliance Manager 100 Strang Road LaPorte, TX 77571 Phone: (281) 478-1944 Email: john_maitino@praxair.com	16" oxygen (abandoned)
EQUISTAR CHEMICALS, LP (PHMSA OPID 25146) (Tx RRC Permit T-4 No. 03970)	Matthew Cesarz, Technical Manager 16055 Space Center Blvd, Ste 350, Houston, TX 77062 Phone: (281) 709-0626 Email: matthew.cesarz@lyb.com	8.63" HVL transmission 170 BDKL - HOUSTON SHIP- CHANNEL - B
EXXONMOBIL PIPELINE COMPANY (PHMSA OPID 99329) (Tx RRC Permit T-4 No. 06456)	Gautam Singh, Geospatial Systems and Graphics Supervisor 22777 Springwoods Village Parkway E3 4A 611 Spring, TX 77389 Phone: (832) 625-8965 Email: gautam.singh@exxonmobil.com	6.63" propylene transmission BAYTOWN-SURV-STRANG RD. SCRAPER TRAP ID
EXXONMOBIL PIPELINE COMPANY (PHMSA OPID 99329) (Tx RRC Permit T-4 No. 06454)	Gautam Singh, Geospatial Systems and Graphics Supervisor 22777 Springwoods Village Parkway E3 4A 611 Spring, TX 77389 Phone: (832) 625-8965 Email: gautam.singh@exxonmobil.com	8.63" refined product transmission BAYTOWN "Y" JUNCTION - FAIRMONT JUNCTION
EQUISTAR CHEMICALS, LP (PHMSA OPID 25146) (Tx RRC Permit T-4 No. 07845)	Matthew Cesarz, Technical Manager 16055 Space Center Blvd, Ste 350, Houston, TX 77062 Phone: (281) 709-0626 Email: matthew.cesarz@lyb.com	6.63" HVL transmission CHOCOLATE BAYOU NORTH
EXXONMOBIL PIPELINE COMPANY (PHMSA OPID 99329) (Tx RRC Permit T-4 No. 06455)	Gautam Singh, Geospatial Systems and Graphics Supervisor 22777 Springwoods Village Parkway E3 4A 611 Spring, TX 77389 Phone: (832) 625-8965 Email:	10.75" dilute propylene xmission MT BELVIEU - CLEAR LAKE TX-135A

Operator	Point of Contact	Pipeline
	gautam.singh@exxonmobil.com	
DOW PIPELINE COMPANY (PHMSA OPID 3527) (Tx RRC T-4 Permit No. 00495)	Roger Smith, Public Awareness/Security Specialist PO Box 186, Seadrift, TX 77983 Phone: (361) 553-3189 Email: smithrp@dow.com	8.63" ethylene gas transmission GCPL_MB-8 (ETHYLENE)_8IN
EQUISTAR CHEMICALS, LP (PHMSA OPID 25146) (Tx RRC Permit T-4 No. 07845)	Matthew Cesarz, Technical Manager 16055 Space Center Blvd, Ste 350, Houston, TX 77062 Phone: (281) 709-0626 Email: matthew.cesarz@lyb.com	8.63" refined products xmission CHOCOLATE BAYOU NORTH
EXXONMOBIL PIPELINE COMPANY (PHMSA OPID 99329) (Tx RRC Permit T-4 No. 04987)	Gautam Singh, Geospatial Systems and Graphics Supervisor 22777 Springwoods Village Parkway E3 4A 611 Spring, TX 77389 Phone: (832) 625-8965 Email: gautam.singh@exxonmobil.com	8.63" HVL transmission FAIRMONT PARKWAY - BOP 137+90 - 139+22.9
EQUISTAR CHEMICALS, LP (PHMSA OPID 25146) (Tx RRC Permit T-4 No. 03966)	Matthew Cesarz, Technical Manager 16055 Space Center Blvd, Ste 350, Houston, TX 77062 Phone: (281) 709-0626 Email: matthew.cesarz@lyb.com	8.63" HVL transmission 65 MONT BELVIEU TO BAYPORT (6.5, 59)
AIR PRODUCTS LLC (PHMSA OPID 117) (Tx RRC T-4 Permit No. 08914)	Leticia Bailey, Pipeline Compliance Manager 10202 Strang Road, La Porte, TX 77571 Phone: (281) 478-7579 Email: baileyln@airproducts.com	8.63" refined product (abandoned) (863) 8" N2 BAYPORT - AIR LIQUIDE
AIR PRODUCTS LLC (PHMSA OPID 117) (Tx RRC T-4 Permit No. 06412)	Leticia Bailey, Pipeline Compliance Manager 10202 Strang Road, La Porte, TX 77571 Phone: (281) 478-7579 Email: baileyln@airproducts.com	4.5" carbon monoxide xmission (124) 4" CO LA PORTE - ACTIVIA
PHILLIPS 66 PIPELINE LLC (PHMSA OPID 31684) (Tx RRC T-4 Permit No. 00178)	Todd Tullio, Manager, DOT Compliance 2331 Citywest Blvd HQ-08-5820-05 Houston, TX 77043 Phone: (832) 765-1636 Email: Todd.L.Tullio@p66.com	18" HVL Interstate transmission SR71 CLEMENS TO/FROM MT BELVIEU 18IN
AIR PRODUCTS LLC (PHMSA OPID 117) (Tx RRC T-4 Permit No. 00093)	Leticia Bailey, Pipeline Compliance Manager 10202 Strang Road, La Porte, TX 77571 Phone: (281) 478-7579 Email: baileyln@airproducts.com	6.63" Interstate hydrogen xmission (247) 8" H2 CLEAR LAKE - AIR LIQUIDE CRO

Operator	Point of Contact	Pipeline
AIR LIQUIDE LARGE INDUST U.S. LP (PHMSA OPID 842) (Tx RRC T-4 Permit No. 04279)	Bobby Skelton, Regulatory Compliance Manager 9811 Katy Freeway #100 Houston, TX 77024 Phone: (713) 438-6351 Email: Bobby.skelton@airliquide.com	6.63" hydrogen xmission SEPCA SYSTEM
MATHESON TRI-GAS, INC. (PHMSA OPID TBD) (Tx RRC T-4 Permit No. 10075)	Terry Phipps, VP HyCO Operations 11603 Strang Road La Porte, TX 77571 Phone: (281) 417-2095 Email: N/A (See Note 2, below)	8.63" hydrogen transmission TEXAS H2 8"
KINDER MORGAN TEJAS PIPELINE LLC (PHMSA OPID 4900) (Tx RRC T-4 Permit No. 00774)	Public Awareness Coordinator 1001 Louisiana Street Suite 1000 Houston, TX 77002 Phone: (800) 276-9927 Email: publicawareness@kindermorgan.com	8.63" natural gas transmission BAYPORT LATERAL
ENTERPRISE PRODUCTS OPERATING LLC (PHMSA OPID 31618) (Tx RRC T-4 Permit No. 07006)	Public Awareness Department P.O. Box 4324 Houston, TX 77210 Phone: (713) 438-6351 Email: PublicAwareness@eprod.com	4.5" refined product xmission BAYPORT 4"
SHELL PIPELINE COMPANY LP (PHMSA OPID 31174) (Tx RRC T-4 Permit No. 01747)	Pratik Bhakta, Regulatory Engineer P.O. BOX 2648, Houston, TX 77252 Phone: (713) 241-4660 Email: pratik.bhakta@shell.com	8.63" ethylene transmission 209 - 8IN 8-10 JCT TO FAIRMONT
ENTERPRISE PRODUCTS OPERATING LLC (PHMSA OPID 31618) (Tx RRC T-4 Permit No. 08309)	Public Awareness Department P.O. Box 4324 Houston, TX 77210 Phone: (713) 438-6351 Email: PublicAwareness@eprod.com	20" HVL transmission (EAGLE FORD) ALVIN STATION TO MONT BELVI
EQUISTAR CHEMICALS, LP (PHMSA OPID 25146) (Tx RRC Permit T-4 No. 03970)	Matthew Cesarz, Technical Manager 16055 Space Center Blvd, Ste 350, Houston, TX 77062 Phone: (281) 709-0626 Email: matthew.cesarz@lyb.com	4.5" HVL transmission 196 PM - HIGHWAY 225 TRAPS - MONTELL
OCELOT ENERGY MANAGEMENT LLC (PHMSA OPID TBD) (Tx RRC Permit T-4 No. 10047)	Mr. Donald Gideon, President 8333 Douglas Avenue, Suite 400 Dallas, TX 75225 Phone: (214) 310-1230 Email: N/A (See Note 2, below)	6.63" liquid nitrogen line 805A SOUTH HOUSTON SHIP CHANNEL - BAYPORT
OCELOT ENERGY MANAGEMENT LLC (PHMSA OPID TBD) (Tx RRC Permit T-4 No. 07410)	Mr. Donald Gideon, President 8333 Douglas Avenue, Suite 400 Dallas, TX 75225 Phone: (214) 310-1230 Email: N/A (See Note 2, below)	6.63" HVL transmission CLEAR LAKE GAS PLANT TO TEPICID BAYTOWN
EQUISTAR CHEMICALS, LP (PHMSA OPID 25146) (Tx RRC Permit T-4 No. 01588)	Matthew Cesarz, Technical Manager 16055 Space Center Blvd, Ste. 350, Houston, TX 77062 Phone: (281) 709-0626 Email: matthew.cesarz@lyb.com	6.63" HVL transmission 32_MARKHAM (MKO) TO DEER PARK, 6"

Operator	Point of Contact	Pipeline
EQUISTAR CHEMICALS, LP (PHMSA DPID 25146) (Tx RRC Permit T-4 No. 07725)	Matthew Cesarz, Technical Manager 16055 Space Center Blvd, Ste 350 , Houston, TX 77062 Phone: (281) 709-0626 Email: matthew.cesarz@tyb.com	6.63" HVL transmission MONT BELVIEU - BAYPORT

Notes:

1. All of the lines are listed as intrastate transmission lines by Texas Railroad Commission unless otherwise indicated.
2. Points of contact are from the National Pipeline Mapping System except for Motiva Chemicals (RRC T-4 File), Matheson Tri-Gas, and Ocelot Energy Management (contact info from RRC Operator Address List – not listed by PHMSA as having DPIDs yet).

Cypress Creek at La Porte PIPA Compliance Matrix
TDHCA Application # 20318

PIPA Property Developer/Owner Recommended Practices

(PIPA Final Report of Recommended Practices, Nov. 2010 - no changes to PIPA Recommended Practices as of 2-11-20)

No	Title and Practice Statement	Proposed Compliance Actions	Actual Compliance Actions
	Baseline (BL) Recommended Practices		
	<i>"Understand the Elements of a Transmission Pipeline Easement"</i>		
BL07	Property developers/owners should have an understanding of the elements of and rights conveyed in a transmission pipeline easement.	The Property Developers have secured/will secure and review copies of the relevant pipeline easements. There are no easements on the proposed site.	
	<i>"Manage Land Records"</i>		
BL08	Land use agreements between pipeline operators and property owners should be documented and managed and, when necessary, recorded.	All land use agreements will be in writing and, where appropriate, will be recorded. (None are anticipated)	
	<i>"Document and Record Easement Amendments"</i>		
BL09	Easement amendments should be documented, managed and recorded.	No easements are contemplated. However, if any are necessary, they will be recorded.	
	<i>"Participate to Improve State Excavation Damage Prevention Programs"</i>		
BL14	All pipeline safety stakeholders should participate in the work of organizations seeking to make improvements to state excavation damage prevention programs, especially efforts to reduce exemptions from participation in one-call systems.	The Property Developers will use "call before you dig" prior to initiation of construction activities and will support the Texas Railroad Commission's Pipeline Damage Prevention Program.	

No	Title and Practice Statement	Proposed Compliance Actions	Actual Compliance Actions
	<p>New Development (ND) Recommended Practices</p> <p><i>"Gather Information for Design of Property Development near Transmission Pipelines"</i></p>		
ND002	<p>In designing a proposed property development, the property developer/owner should use all reasonable means to obtain information about transmission pipeline facilities in the area of the proposed development</p>	<p>All jurisdictional pipelines in the area of the proposed development have been identified through use of public mapping systems and visual inspection for pipeline markers and ROW. See attached list of pipelines potentially affecting Cypress Creek at La Porte.</p>	
ND003	<p><i>"Review Acceptability of Proposed Land Use of Transmission Pipeline Right-of-Way Prior to Design"</i></p> <p>The property developer/owner should review preliminary information about acceptable land uses on a transmission pipeline right-of-way prior to the design of a property development.</p>	<p>The Property Developers have reviewed the PIPA materials and retained a "qualified pipeline compliance consultant" to better understand and implement the PIPA process.</p>	
ND004	<p><i>"Coordinate Property Development Design and Construction with Transmission Pipeline Operator"</i></p> <p>When property development is planned within the consultation zone (reference PIPA Recommended Practice BL05), the property developer/owner and the transmission pipeline operator should communicate to ensure possible impacts of pipeline incidents and maintenance needs are considered during development design and construction.</p>	<p>All pipeline operators on the attached list of pipelines potentially affecting Cypress Creek at La Porte will be contacted to assure that the concerns of the pipeline operators will be addressed. There should be none.</p>	

No	Title and Practice Statement	Proposed Compliance Actions	Actual Compliance Actions
	New Development (ND) Recommended Practices (continued)		
ND10	<p><i>"Record Transmission Pipeline Easements on Development Plans and Final Plats"</i></p> <p>Local governments should require all recorded development plans and final plats to clearly show the location of transmission pipeline easements and identify the pipeline operators</p>	<p>The Property Developers will comply with all appropriate recording requirements.</p>	
ND11	<p><i>"Reduce Transmission Pipeline Risk through Design and Location of New Parking Lots and Parking Structures"</i></p> <p>Parking lots and parking structures should be preferentially located and designed to reduce the consequences that could result from a transmission pipeline incident and to reduce potential interference with transmission pipeline maintenance and inspections.</p>	<p>There are no pipeline easements on the proposed site. Buildings will be at least 50 feet from the nearest pipeline and at least 10 feet from edge of the pipeline corridor (whichever is greatest).</p>	
ND12	<p><i>"Reduce Transmission Pipelines Risk through Design and Location of New Roads"</i></p> <p>Roads and associated appurtenances should be preferentially located and designed to reduce the consequences that could result from a transmission pipeline incident and reduce the potential of interference with pipeline operations and maintenance</p>	<p>See ND11, above.</p>	

No	Title and Practice Statement	Proposed Compliance Actions	Actual Compliance Actions
	<p>New Development (ND) Recommended Practices (continued)</p> <p><i>"Reduce Transmission Pipeline Risk through Design and Location of New Utilities and Related Infrastructure"</i></p>		
ND13	<p>Utilities (both above and below ground) and related infrastructure should be preferentially located and designed to reduce the consequences that could result from a transmission pipeline incident and to reduce the potential of interference with transmission pipeline maintenance and inspections.</p>	<p>Any additional off-site utilities and infrastructure will be designed "around" the pipelines in consultation with the pipeline operators. No conflicts are anticipated.</p> <p>See ND11, above.</p>	
ND14	<p><i>"Reduce Transmission Pipeline Risk through Design and Location of Aboveground Water Management Infrastructure"</i></p> <p>Storm water and irrigation water management facilities, retention ponds, and other above-ground water management infrastructure should be preferentially located and designed to reduce the consequences that could result from a transmission pipeline incident and to reduce the potential of interference with transmission pipeline operations and maintenance.</p>	<p>No storm water management facilities, retention ponds, or other above-ground water management infrastructure is proposed on or near the pipeline corridor.</p>	
ND15	<p><i>"Plan and Locate Vegetation to Prevent Interference with Transmission Pipeline Activities"</i></p> <p>Trees and other vegetation should be planned and located to reduce the potential of interference with transmission pipeline operations, maintenance, and inspections.</p>	<p>No trees or other deep-rooted vegetation is planned on or near the pipeline corridor.</p>	

No	Title and Practice Statement	Proposed Compliance Actions	Actual Compliance Actions
ND16	<p><i>New Development (ND) Recommended Practices (continued)</i></p> <p>"Locate and Design Water Supply and Sanitary Systems to Prevent Contamination and Excavation Damage"</p> <p>Individual water supplies (water wells), small public/private water systems and sanitary disposal systems (septic tanks, leach or drain fields) should be designed and located to prevent excavation damage to transmission pipelines, interference with transmission pipeline maintenance and inspections, and environmental contamination in the event of a transmission pipeline incident.</p>	<p>Water systems and sanitary disposal systems will be designed and located to prevent excavation damage to pipelines as well as interference with pipeline maintenance and inspections. Environmental contamination in the event of a pipeline incident is possible because of the nature of the products in the nearby pipelines.</p>	
ND17	<p>"Reduce Transmission Pipeline Risk in New Development for Residential, Mixed-Use, and Commercial Land Use"</p> <p>New development within a transmission pipeline planning area (see PIPA Recommended Practice BLO6) should be designed and buildings located to reduce the consequences that could result from a transmission pipeline incident and to provide adequate access to the pipeline for operations and maintenance.</p>	<p>See the proposed project layout (copy attached). Consequences of a pipeline incident are minimized by architectural design and building setback. Access to pipelines for maintenance will not be significantly affected by the proposed project.</p>	

No	Title and Practice Statement	Proposed Compliance Actions	Actual Compliance Actions
	New Development (ND) Recommended Practices (continued)		
ND18	<p><i>"Consider Transmission Pipeline Operation Noise and Odor in Design and Location of Residential, Mixed-Use, and Commercial Land Use Development"</i></p> <p>Consider noise, odor and other issues when planning and locating developments near above-ground transmission pipeline facilities, such as compressor stations, pumping stations, odorant equipment, regulator stations and other pipeline appurtenances.</p> <p><i>"Reduce Transmission Pipeline Risk through Design and Location of New Industrial Land Use Development"</i></p>	<p>There are no non-pipeline appurtenances (compressor stations, pump stations, blowdowns, etc.) near enough to the proposed development to cause any noise or odor issues absent a catastrophic pipeline failure.</p>	
ND19	<p>New industrial land use development within a transmission pipeline planning area (see PIPA Recommended Practice BLO6) should be designed and buildings located to reduce the consequences that could result from a transmission pipeline incident and reduce the potential of interference with transmission pipeline operations and maintenance.</p>	<p>Not applicable. The proposed development is not an industrial development.</p>	

No	Title and Practice Statement <i>New Development (ND) Recommended Practices (continued)</i>	Proposed Compliance Actions	Actual Compliance Actions
ND20	<p><i>"Reduce Transmission Pipeline Risk through Location, Design, and Construction of New Institutional Land Use Developments"</i></p> <p>New development of institutional facilities that may be difficult to evacuate within a transmission pipeline planning area (see PIPA Recommended Practice BL06) should be designed and the facilities located and constructed to reduce the consequences that could result from a transmission pipeline incident. Such facilities should also be located to reduce the potential of interference with transmission pipeline operations and maintenance activities. Emergency plans for these facilities should consider potential transmission pipeline incidents.</p>	<p>Not applicable. The proposed development is not an institutional facility.</p>	
ND21	<p><i>"Reduce Transmission Pipeline Risk through Design and Location of New Public Safety and Enforcement Facilities"</i></p> <p>New development of emergency responder facilities within a transmission pipeline planning area (see PIPA Recommended Practice BL06) should be designed and the facilities located and constructed to reduce the consequences that could result from a transmission pipeline incident. Such facilities should also be designed and located to avoid the potential of interference with pipeline operations and maintenance. Planning for these facilities should include emergency plans that consider the effects of a transmission pipeline incident.</p>	<p>Not applicable. No new emergency responder facilities are associated with the proposed development. Secondary ingress/egress will be coordinated with emergency responders.</p>	

No	Title and Practice Statement	Proposed Compliance Actions	Actual Compliance Actions
	<p>New Development (ND) Recommended Practices (continued)</p> <p>"Reduce Transmission Pipeline Risk through Design and Location of New Places of Mass Public Assembly (Future Identified Sites)"</p>		
ND22	<p>New development of places of potential mass public assembly within a transmission pipeline planning area (see PIPA Recommended Practice BL06) should be designed and the facilities located and constructed to reduce the consequences of a potential transmission pipeline incident, the risk of excavation damage to the pipeline, and the potential of interference with transmission pipeline operations and maintenance. Planning for these facilities should include emergency plans that consider the effects of a potential pipeline incident</p> <p>"Consider Site Emergency Response Plans in Land Use Development"</p> <p>Emergency response plan requirements should be considered in new land use development within a planning area (see PIPA Recommended Practice BL06) to reduce the risks of a transmission pipeline incident.</p>	<p>Not applicable. There are no places of potential mass public assembly (stadiums, ball parks, churches, auditoriums, etc.) proposed as part of the proposed development.</p> <p>These issues will be coordinated with the pipeline operators and local emergency responders. There appear to be no unique circumstances associated with the proposed development that would require any unusual provisions with respect to site emergency response plans. See ND21, above.</p> <p>This will be accomplished during the construction phase of the project.</p>	
ND23	<p>"Install Temporary Markers on Edge of Transmission Pipeline Right-of-Way Prior to Construction Adjacent to Right-of-Way"</p> <p>The property developer/owner should install temporary right-of-way (ROW) survey markers or fencing on the edge of the transmission pipeline ROW or buffer zone, as determined by the transmission pipeline operator, prior to construction to provide a clearly defined boundary. The property developer/owner should ensure that the temporary markers or fencing are maintained throughout the course of construction.</p>		

No	Title and Practice Statement	Proposed Compliance Actions	Actual Compliance Actions
	New Development (ND) Recommended Practices (continued)		
ND25	<p><i>"Contact Transmission Pipeline Operator Prior to Excavating or Blasting"</i></p> <p>Anyone planning to conduct excavating, blasting and/or seismic activities should consult with affected transmission pipeline operators well in advance of commencing these activities. Excavating and blasting have the potential to affect soil stability or lead to movement or settling of the soil surrounding the transmission pipeline.</p>	<p>The pipeline operators will be notified both as part of the call-before-you-dig process and as a matter of courtesy in appreciation of their cooperation during the planning process. No blasting is contemplated as part of the construction.</p>	
ND26	<p><i>"Use, Document, Record and Retain Encroachment Agreements or Permits"</i></p> <p>Encroachment agreements should be used, documented, recorded and retained when a transmission pipeline operator agrees to allow a property developer/owner or local government to encroach on the pipeline right-of-way for a long or perpetual duration in a manner that conflicts with the activities allowed on the easement.</p>	<p>Not applicable. No encroachments are contemplated for the proposed development.</p>	
ND27	<p><i>"Use, Document and Retain Letters of No Objection and Conditional Approval Letters"</i></p> <p>Transmission pipeline operators may use, document and retain "letters of no objection" in agreeing to land use activities on or near a transmission pipeline right-of-way. Such land uses may or may not be temporary.</p>	<p>The Property Developer will maintain an archive of all correspondence with the pipeline operators.</p>	
ND28	<p><i>"Document, Record and Retain Partial Releases"</i></p> <p>Partial releases may be used to allow some part of the transmission pipeline right-of-way to be released from certain easement conditions, and should be documented, recorded and retained.</p>	<p>Not applicable. No partial releases are anticipated as part of the proposed development.</p>	

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John Jacobi is licensed Professional Engineer and a licensed attorney with over 45 years of energy industry experience. Mr. Jacobi has been involved with the development of pipeline safety regulations and in the communication of those regulations to all stakeholders, including the public, the operators, and government officials. He has been a frequent lecturer at state pipeline safety seminars, as well as at industry organization functions (SGA, TGA, LGA, NMGA, INGAA, API, AGA, the Common Ground Alliance and the Pipeline Safety Trust).

Mr. Jacobi served as Vice President and Principal Regulatory Specialist for G2 Integrated Solutions from November 2012 until he retired in December 2017. During his tenure at G2, Mr. Jacobi focused on the interpretation and application of the pipeline safety regulations, 49 CFR Parts 190 – 199 on behalf of numerous interstate and intrastate pipeline operators. In addition, Mr. Jacobi developed numerous manuals & procedures, conducted numerous mock inspections, facilitated numerous actual regulatory inspections, and assisted real estate developers by evaluating the potential impact of pipelines as required by the Texas Department of Housing and Community Assistance (TDHCA).

Prior to joining G2, Mr. Jacobi served as Community Assistance/Technical Services (CATS) Manager in the USDOT's Office of Pipeline Safety (OPS), Southwest Region for almost a decade. His responsibilities as a CATS Manager included dealing with public inquiries regarding pipeline safety from the public, from Federal state and local elected officials, from pipeline operators and from pipeline consultants. Mr. Jacobi served as a facilitator for the organization of the Pipelines and Informed Planning Alliance (PIPA) and served on the Protecting Communities Committee for the duration of the project. Mr. Jacobi represented OPS on the committee charged with revising API RP 1162 - Public Awareness Programs for Pipeline Operators and OPS at numerous FERC scoping meetings and public hearings regarding LNG facilities and associated pipelines. Mr. Jacobi received a commendation for re-establishing meaningful communications with the City of Austin Texas regarding the Longhorn Pipeline and represented OPS at several US Department of State hearings regarding the Keystone XL Pipeline in Oklahoma and Texas. Mr. Jacobi has been active in the Greater Houston LEPC and NASFM emergency training initiatives.

In the private sector prior to his tenure with OPS, Mr. Jacobi prepared or managed the preparation of the environmental exhibits for FERC 7c and 7b certificates as well blanket certificate reporting and 2.55 replacements-in-kind.

A former Presidential Exchange Executive, Mr. Jacobi received his Bachelor of Science in Mechanical Engineering (with Honors) from Rose-Hulman Institute of Technology, his Master of Science in Industrial Engineering from Texas A & M University, and his Juris Doctorate from the University of Missouri - Kansas City. Mr. Jacobi maintains his status as licensed Professional Engineer and a licensed attorney and counselor at law in the State of Texas.

EXHIBIT I

Photo of 5,000 gallon AST located at Harvey & Rihn Aviation, taken from its website at <https://www.harveyrihn.com/maintenance-and-hangars> .



EXHIBIT J

Phase I Environmental Site Assessment

Cypress Creek Apartment Homes at La Porte
Northeast Quadrant of Spencer Highway and Airport Boulevard
La Porte, Harris County, Texas

February 21, 2020

Terracon Project No. 92207048



Prepared for:

Stuart Shaw Family Partnership, Ltd.
c/o Cypress Creek La Porte LP
Austin, Texas

Prepared by:

Terracon Consultants, Inc.
Houston, Texas

terracon.com

Terracon

Environmental



Facilities



Geotechnical



Materials

Phase I Environmental Site Assessment

Cypress Creek Apartment Homes at La Porte ■ La Porte, Texas
February 21, 2020 ■ Terracon Project No. 92207048



EXECUTIVE SUMMARY

This Phase I Environmental Site Assessment (ESA) was performed in accordance with Terracon Proposal No. P92207048 dated January 16, 2020, and was consistent with the procedures included in ASTM E 1527-13, *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process*. The Environmental Professional has read and understands the requirements outlined in Section 11.305 Environmental Site Assessment Rules and Guidelines of the Texas Department of Housing and Community Affairs (TDHCA) 2020 Uniform Multifamily Rules. The purpose of this ESA was to assist the client in developing information to identify Recognized Environmental Conditions (RECs) in connection with the site as reflected by the scope of this report. The ESA was conducted under the supervision or responsible charge of Ms. Jessica Kemp, Environmental Professional, who performed the site reconnaissance on February 7, 2020.

Findings

A summary of findings is provided below. It should be recognized that details were not included or fully developed in this section, and the report must be read in its entirety for a comprehensive understanding of the items contained herein.

Site Description and Use

The site is an approximate 11.5-acre tract of undeveloped land located in the northeast quadrant of Spencer Highway and Airport Boulevard in La Porte, Harris County, Texas.

Historical Information

Based on the review of the historical information, the site has consisted of undeveloped and/or agricultural land since at least the mid-1910s.

The north adjoining property consisted of undeveloped and/or agricultural land from the mid-1910s through the early 2000s when the current residential improvements were constructed. The east adjoining property consisted of undeveloped land from the mid-1910s through the late 1980s when the current church was constructed. The south adjoining property consisted of residential and/or agricultural structures from at least the mid-1910s until commercial development began in the 1970s and continued through the early 2000s. The west adjoining property consisted of undeveloped and/or agricultural land from at least the mid-1910s through the late 1960s when a pipeline easement was constructed.

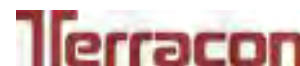
Records Review

The site was not listed in the current environmental regulatory database obtained by Terracon. A review of federal and state regulatory database information identified several listed facilities within the specified search area.

Phase I Environmental Site Assessment

Cypress Creek Apartment Homes at La Porte ■ La Porte, Texas

February 21, 2020 ■ Terracon Project No. 92207048



■ **Harvey & Rihn Aviation**

Harvey & Rihn Aviation, located approximately 300 feet west of the site, was identified within the regulatory database as a Texas Commission on Environmental Quality (TCEQ) Industrial and Hazardous Waste (IHW) and petroleum storage tank (PST) facility. This facility is listed as an inactive conditionally exempt small quantity generator (CESQG). No information regarding the historical waste streams generated at this facility were readily available. Review of on-line TCEQ records indicate this facility operated an 8,000-gallon underground storage tank (UST) that was installed in 1978 and was permanently filled in place in 1999. No information regarding the exact location of the UST was available; however, the operational area of this facility (most likely location of the UST) is positioned at least 350 feet west of the site. Additionally, on-line TCEQ records indicate this facility currently operates a 5,000-gallon aviation gasoline aboveground storage tank (AST) that was put in place in 1999. Review of aerial photographs indicate the AST is positioned at least 430 feet west of the site. Based on the distance of operations from the site, the Harvey & Rihn Aviation facility does not constitute an REC to the site.

Terracon has reviewed 10 TAC §11.101(a)(2)(f) - Undesirable Site Features of the 2020 QAP that is detailed below:

(F) Development Sites located within 500 feet of heavy industry (i.e. facilities that require extensive use of land and machinery, produce high levels of external noise such as manufacturing plants, or maintains fuel storage facilities (excluding gas stations));

Based on the absence of apparent manufacturing and machining, Terracon does not consider this facility, that operates with a single aviation gasoline AST, to be considered a “heavy industry” facility as it pertains to subparagraph F. Based on Terracon’s understanding of the 2020 QAP, this facility does not appear to be considered an Undesirable Site Feature. Per HUD Guidelines, Terracon recommends that the only additional testing to be done is a noise study.

- The remaining facilities listed in the database report do not appear to represent RECs to the site at this time based upon distance from the site.

Terracon reviewed the on-line Railroad Commission of Texas (RRC) records (available through the RRC public GIS map viewer and related databases) to identify registered pipelines and/or oil/gas wells on or adjacent to the site. Based on the review of RRC on-line records, no registered oil/gas wells were identified on or adjacent to the site. On-line RRC records indicate a pipeline easement is located on the west adjoining property. The pipeline easement contains numerous pipelines that carry various products such as crude oil, highly volatile liquid, refined liquid products, and other gases. Various operators of the referenced pipelines were identified. While it is possible that soil and groundwater at the site have been affected by releases from the pipelines, evidence of a release was not identified. Based on this information and Terracon’s experience

Phase I Environmental Site Assessment

Cypress Creek Apartment Homes at La Porte ■ La Porte, Texas

February 21, 2020 ■ Terracon Project No. 92207048



investigating pipeline systems, it is our opinion that the likelihood of a release from the pipelines to have impacted the site is considered low enough not to constitute an REC to the site at this time. It should be noted that if a pipeline release were discovered, the owner/operator of the pipeline is typically responsible for associated corrective actions.

Site Reconnaissance

The site currently consists of undeveloped land. Based on the site reconnaissance, RECs were not identified associated with the current site operations.

Adjoining Properties

The site is bound to the north by residential development; to the east by Bayshore Baptist Church; to the south by Spencer Highway followed by Spencer Mini Storage and undeveloped land; and to the west by a pipeline easement. Indications of RECs were not observed with the current uses of adjoining properties.

Additional Services

Based on the authorized scope of work, Terracon conducted Texas Department of Housing and Community Affairs (TDHCA) additional scope items, which included a limited noise review, current survey review, a FEMA Flood Insurance Rate Map review, visual observation for asbestos-containing materials, lead-based paint review, lead in drinking water review, radon records review, oil/gas and chemicals review, and a Vapor Encroachment Screening.

- Limited noise review

Per the Noise Guidebook, published by the U.S. Department of Housing and Urban Development (HUD), items under consideration include: all airports (civilian and military) within 15 miles of the site, all significant roads within 1,000 feet, and all railroads within 3,000 feet of the site. Spencer Highway is located adjacent south of the site. La Porte Municipal Airport is located less than 500 feet west of the site. Railroads were not identified within 3,000 feet of the site. Based on the proximity of a major roadway and airport to the site, per HUD guidelines, Terracon recommends that a noise study be conducted.

- Current survey review

A site diagram, which displays the property boundaries, adjacent streets, and/or improvements on the site and surrounding properties, is provided in Appendix A as Exhibit 2.

- FEMA Flood Insurance Map review

Terracon obtained a copy of the FEMA Flood Insurance Rate Map (FIRM) from the official FEMA website. Review of the FIRM Panel No. 48201C0945M (dated January 6, 2017) indicates that the majority of the site is located within Zone X (outside of the 500-year floodplain). The southwestern and a portion of the western portion of the site are located within Zone X Shaded (0.2% annual chance flood hazard).

Phase I Environmental Site Assessment

Cypress Creek Apartment Homes at La Porte ■ La Porte, Texas

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- Visual observation for asbestos-containing materials

The site consists of vacant land; therefore, testing for asbestos-containing materials (ACMs) would not be required pursuant to local, state, and federal laws.

- Lead-based paint review

The site consists of vacant land; therefore, testing for lead-based paint materials would not be required pursuant to local, state, and federal laws.

- Lead in drinking water review

Terracon understands that any future development would rely on the City of La Porte to provide drinking water to the site. Terracon reviewed the most recent water quality report to evaluate if water quality meets the applicable lead standard. Based on the 2018 La Porte Water Quality Report, some contaminants were identified within the drinking water; however, none of the contaminants exceeded the Maximum Contaminant Level (MCL). Lead in drinking water is often associated with lead-soldered plumbing in old structures. Since the site consisted of vacant land, no sampling for lead in drinking water was conducted for this project.

- Radon records review

Based on a review of the EPA Map of Radon Zones, the site is located in EPA Zone 3, which includes counties which have a predicted average screening level of less than 2 picoCuries per liter (pCi/L). Radon testing was not conducted as part of the scope of services; additionally, Terracon does not consider future radon testing at the site to be warranted because the potential for the presence of radon is considered low (according to EPA standards).

- Oil/gas and chemicals review

Using current and historical aerial photographs along with state regulatory records, Terracon searched for aboveground storage tanks (ASTs) and/or tank batteries on adjoining and nearby properties. No ASTs were identified on or adjacent to the site. However, a 5,000-gallon aviation gasoline aboveground storage tank (AST) is positioned approximately 430 feet west of the site.

Due to the absence and/or distance of aboveground stationary containerized hazards of an explosive or fire prone nature a HUD blast zone map and calculation were not deemed necessary at this time.

- Vapor Encroachment Screening

Based on the physical setting of the site and the current and historical use of the site, Vapor Encroachment Conditions (VECs) are not likely to exist at the site at this time.

Phase I Environmental Site Assessment

Cypress Creek Apartment Homes at La Porte ■ La Porte, Texas
February 21, 2020 ■ Terracon Project No. 92207048



Opinions and Conclusions

We have performed a Phase I ESA consistent with the procedures included in ASTM Practice E 1527-13 of the Proposed Cypress Creek Apartment Homes at La Porte located in the northeast quadrant of Spencer Highway and Airport Boulevard in La Porte, Harris County, Texas, the site. RECs or Controlled RECs (CRECs) were not identified in connection with the site.

Significant Data Gaps

No significant data gaps were identified within this report.

Recommendations

Based on the scope of services, limitations, and conclusions of this assessment, Terracon did not identify RECs or CRECs. As such, no additional investigation is warranted at this time.

Per HUD guidelines, Terracon recommends that a noise study be conducted.

TDHCA Response



TEXAS DEPARTMENT OF HOUSING AND COMMUNITY AFFAIRS

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May 4, 2020

Writer's direct dial: (512) 475-3296
Email: bobby.wilkinson@tdhca.state.tx.us

Stuart Shaw
Cypress Creek La Porte, LP
901 S. Mopac Expy., Bldg. 5, Ste. 100
Austin, Texas 78746

RE: APPEAL RESPONSE FOR 20318 CYPRESS CREEK APARTMENT HOMES AT LA PORTE, LA PORTE

Dear Mr. Shaw:

The Texas Department of Housing and Community Affairs received your appeal dated April 20, 2020, regarding the termination of the Application named above. Staff found that the Development Site is ineligible pursuant to 10 TAC §11.101(a)(2) because of the Development Site's proximity to the existing and the ultimate runway protection zones, an airplane fueling station, and a pipeline corridor.

The appeal restates much of the information already reviewed by staff, and offers as new information a recently-concluded aeronautical study from the Federal Aviation Administration Southwest Regional Office in Fort Worth, which found that the Development will not be a hazard to air navigation, expressly conditioned on the installation of special rooftop markings and lighting on the building nearest to the runway. None of the information provided in the appeal leads me to conclude differently than staff: that the Development Site's proximity to the runway protection zones, a fuel storage facility (i.e. a 5000 above-ground airplane fueling station), and the pipeline corridor makes it an unnecessarily hazardous site to locate a multifamily development under the 2020 QAP.

I do not find that Staff was incorrect in concluding that the Development Site is ineligible pursuant to 10 TAC §11.101(a)(2). Accordingly, I am denying the appeal. You have indicated that if I do not grant your appeal, you wish to have your appeal heard by the board. Your appeal will be placed on the agenda for the May 23, 2020, meeting of the Department's Governing Board. Please review 10 TAC §11.902 for the appeal process.

If you have any questions or require further information, please contact Marni Holloway, Multifamily Finance Director, at marni.holloway@tdhca.state.tx.us.



Sincerely,

A handwritten signature in black ink, appearing to read "Bobby Wilkinson". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Bobby Wilkinson
Executive Director

BOARD ACTION ITEM
MULTIFAMILY FINANCE DIVISION
MAY 21, 2020

Presentation, discussion, and possible action on timely filed appeal under the Department's Multifamily Program Rules for Application 20342 The Cottages at Cedar Ridge

RECOMMENDED ACTION

WHEREAS, the appeal relates to Competitive Housing Tax Credit (HTC) Application 20342 The Cottages at Cedar Ridge, which was submitted to the Department by the Full Application Delivery Date;

WHEREAS, a notification of scoring adjustment was provided to the Applicant identifying points that the Applicant elected but that staff determined the Application did not qualify to receive under 10 TAC §11.9;

WHEREAS, the Applicant timely filed an appeal; and

WHEREAS, the Executive Director denied the appeal;

NOW, therefore, it is hereby

RESOLVED, that the scoring appeal for 20342 The Cottages at Cedar Ridge is hereby denied.

BACKGROUND

10 TAC §11.9, related to Competitive HTC Selection Criteria, identifies the scoring criteria used in evaluating and ranking Applications. It includes those items required under Tex. Gov't Code, Chapter 2306, §42 of the Internal Revenue Code (the Code), and other criteria established in a manner consistent with Chapter 2306 and §42 of the Code.

The Application proposes the New Construction of 64 Units for the Elderly population in Elgin, of which 40 will be restricted and 24 will be market Rate.

10 TAC §11.9(d)(8) related to Readiness to Proceed (RTP) allows five points for a Development located in a disaster impacted county declared by the Federal Emergency Management Agency to be eligible for individual assistance within three years preceding December 1, 2019. The proposed Development is located in Travis County, which is not an eligible county under the rule. Staff issued a notification of scoring adjustment alerting the Applicant of the loss of five points, subject to the Applicant's ability to appeal. Per the rule:

(8) Readiness to proceed in disaster impacted counties. An Application for a proposed Development that is located in a county declared by the Federal Emergency Management Agency to be eligible for individual assistance within three years preceding December 1, 2019, that provides a certification that they will close all financing and fully execute the construction contract on or before the last business day of November or as otherwise permitted under subparagraph (C) of this paragraph. For the purposes of this paragraph only, an Application may be designated as "priority." (5 points)

The appeal states that Travis County was included in FEMA declaration 4416-DR-TX, issued on March 22, 2016. The declaration was amended nine times: twice to adjust the incident period to May 22, 2016, through June 24, 2016; six times to add counties to the declaration, and on March 1, 2017, to indicate a change in FEMA personnel. The appeal suggests that each of these amendments amounts to a new declaration, so that Travis County was "declared" to be in a disaster area on March 1, 2017, and therefore within the time frame required by the rule. The appeal also asserts that "[e]ven if Travis County is not an eligible county under 10 TAC §11.9(c)(8), the Applicant relied on TDHCA's published guidance and therefore TDHCA should deem it eligible."

After reviewing the appeal, staff determined that Travis County was declared to be in a disaster area on March 22, 2016. While the amendments established different dates of declaration for the counties subsequently added, they did not change the declaration date for Travis County. That date remains March 22, 2016, which is outside the time frame contemplated by the rule. It was also clear that while on November 20, 2019, Staff published a list of counties eligible for points under RTP that included Travis County in error, Staff also posted a corrected list two days later on November 22, 2019, and followed the posting that same day with a list serve announcement explaining the change. Per 10 TAC §11.1(b) related to Due Diligence and Applicant Responsibility:

Department staff may, from time to time, make available for use by Applicants information and informal guidance in the form of reports and responses to specific questions. The Department encourages communication with staff in order to clarify any issues that may not be fully addressed in the QAP, or may be unclear when applied to specific facts. However, while these resources are offered to help Applicants prepare and submit accurate information, Applicants should also appreciate that this type of guidance is limited by its nature, and that staff will apply the rules of the QAP to each specific situation as it is presented in the submitted Application.

Staff Recommends the Board deny the appeal.

20342 The Cottages at Cedar
Ridge
Scoring Notification



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April 30, 2020

Writer's direct dial: (512) 936-7834
Email: sharon.gamble@tdhca.state.tx.us

Lee Zieben
Cottages Cedar Ridge, Ltd.
1980 Post Oak Blvd., Ste. 2020
Houston, Texas 77056

RE: NOTICE OF SCORING ADJUSTMENT: 20342 THE COTTAGES AT CEDAR RIDGE, ELGIN

Dear Mr. Zieben:

The Texas Department of Housing and Community Affairs (the Department) is in receipt of the Application named above. Upon review, staff has determined that the Application does not qualify for points under 10 TAC §11.9(c)(8) of the 2020 Qualified Allocation Plan (QAP) related to Readiness to Proceed because the Development Site is not located in an eligible county. Per the rule:

(8) Readiness to proceed in disaster impacted counties. An Application for a proposed Development that is located in a county declared by the Federal Emergency Management Agency to be eligible for individual assistance within three years preceding December 1, 2019, that provides a certification that they will close all financing and fully execute the construction contract on or before the last business day of November or as otherwise permitted under subparagraph (C) of this paragraph.

On November 20, 2019, the Department posted a list of counties eligible for points under Readiness to Proceed that inadvertently included counties named in FEMA Declaration 4416 (see attached), which were eligible for public assistance but not for individual assistance. The Department posted a corrected list on November 22, 2019 (see attached). Because Travis County is not an eligible county, the Application is not eligible for the five (5) points requested under §11.9(c)(8), subject to your ability to appeal.

An appeals process exists for the Housing Tax Credit Program. The restrictions and requirements related to the filing of an appeal can be found in §11.902 of the 2020 QAP. If you wish to appeal this decision to the Executive Director, the appeal must be filed, in writing, with the Department not later than seven (7) calendar days after the date of this notification. Please review §11.902 of the 2020 QAP for full instruction on the appeals process. Please note that §11.902(f) of the 2020 QAP and Tex. Gov't

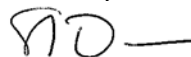


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April 30, 2020
Page 2

Code §2306.6715(c) limit Board review of an Application on appeal to the original Application and those documents contained within the Application.

If you have questions or require further information, please contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "SD" followed by a horizontal line.

Sharon D. Gamble

Competitive HTC Administrator

From: [TDHCA](#)
To: [Sharon Gamble](#)
Subject: TDHCA: Revised 2020 Multifamily Uniform Application Materials
Date: Friday, November 22, 2019 4:25:42 PM

The Texas Department of Housing and Community Affairs' (TDHCA) Multifamily Finance Division has posted revised 2020 Multifamily Uniform Application materials at <http://www.tdhca.state.tx.us/multifamily/apply-for-funds.htm>.

The 2020 List of Declared Disaster Areas posted on Wednesday, November 20, 2019, has been revised to incorporate the following:

10 TAC Section 11.9(c)(8), related to readiness to proceed in disaster impacted counties, requires that in order for a county to qualify an application for scoring under this item, the county must be declared by the Federal Emergency Management Agency (FEMA) to be eligible for individual assistance within three years preceding December 1, 2019. On February 25, 2019, FEMA issued major disaster declaration 4416-DR-TX, amended on March 29, 2019, which together designated 35 counties as eligible for public assistance, but not for individual assistance as required by the rule. The following counties were included in the 2020 List of Declared Disaster Areas in error:

Archer, Baylor, Brown, Burnet, Callahan, Comanche, Coryell, Dimmit, Edwards, Fannin, Franklin, Haskell, Hill, Hopkins, Houston, Jones, Kimble, Kinney, Knox, Llano, Madison, Mason, McCulloch, Menard, Nolan, Polk, Real, San Saba, Schleicher, Sutton, Throckmorton, Travis, Uvalde, and Val Verde.

Grimes County remains eligible because it is included under FEMA major disaster declaration 4332-DR-TX, which includes counties impacted by Hurricane Harvey. This revision does not affect the list of counties eligible for points under 10 TAC Section 11.9(d)(3), related to declared disaster areas.

The 2020 Draft Multifamily Uniform Application posted on Monday, November 18, 2019, has been revised to incorporate the following:

- Tab 6b, Multifamily Direct Loan (MFDL) Self Score, has been added. The form is only applicable if MFDL funds are requested and will self-populate based on scoring selections made throughout the Application. As with 9% housing tax credit applications, Applicants are not required to request points.

- Tab 17, Development Narrative, Section 6: the drop-down boxes under "Multifamily Direct Loan Only" (Y88 and AH88) were unlocked. The boxes are only applicable if MFDL funds are requested.

- Tab 19, Development Activities II, Section 3: a new MFDL scoring item, Subsidy per Unit, has been added. The item is only applicable if MFDL funds are requested.

The Payment Receipt posted on Wednesday, November 20, 2019, has been revised to add a selection box for the 4% HTC Certificate of Bond Reservation, which must be received by TDHCA before a 4% application can be accepted.

If you have questions about any of the posted documents, please contact TDHCA Competitive HTC Program Administrator Sharon Gamble at sharon.gamble@tdhca.state.tx.us.

Please do not reply to this email. It is from an unattended email address. To contact the Texas Department of Housing and Community Affairs, get more information, or view a slideshow of recent TDHCA activities, visit <http://www.tdhca.state.tx.us/> in your Web browser. Like us on facebook (<http://www.facebook.com/TDHCA>) and follow us on twitter (<http://twitter.com/TDHCA>).

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PUBLIC NOTICE FEMA 4416-DR-TX

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Individual Assistance
Declaration Factors

News

Date of Notice:

Friday, March 22, 2019

The Federal Emergency Management Agency (FEMA) hereby gives notice to the public of its intent to reimburse eligible applicants for eligible costs to repair and/or replace facilities damaged by Severe Storms and Flooding between September 10, 2019 to November 2, 2019. This notice applies to the Public Assistance (PA), Individual Assistance (IA), and Hazard Mitigation Grant (HMGP) programs implemented under the authority of the Robert T. Stafford Disaster Relief and Emergency Assistance Act, 42 U.S.C. §§ 5121-5207.

Under a major disaster declaration (FEMA 4416-DR-TX) signed by the President on February 25, 2019, the following counties have been designated adversely affected by the disaster **and eligible for Public Assistance:** Archer, Baylor, Brown, Burnet, Callahan, Comanche, Coryell, Dimmit, Edwards, Fannin, Franklin, Grimes, Haskell, Hill, Hopkins, Houston, Jones, Kimble, Kinney, Knox, Llano, Madison, Mason, McCulloch, Menard, Nolan, Real, San Saba, Sutton, Throckmorton, Travis, Uvalde, and Val Verde. Additional counties may be designated at a later date. All counties in the State of Texas are eligible for HMGP.

This public notice concerns activities that may affect historic properties, activities that are located in or affect wetland areas or the 100-year floodplain, and critical actions within the 500-year floodplain. Such activities may adversely affect the historic property, floodplain or wetland, or may result in continuing vulnerability to flood damage.

Presidential Executive Orders 11988 and 11990 require that all federal actions in or affecting the floodplain or wetlands be reviewed

for opportunities to relocate, and evaluated for social, economic, historical, environmental, legal and safety considerations. Where there is no opportunity to relocate, FEMA is required to undertake a detailed review to determine what measures can be taken to minimize future damages. The public is invited to participate in the process of identifying alternatives and analyzing their impacts through this notification.

FEMA has determined that for certain types of facilities there are normally no alternatives to restoration in the floodplain/wetland. These are facilities that meet all of the following criteria: 1) FEMA's estimate of the cost of repairs is less than 50-percent of the cost to replace the entire facility, and is less than \$100,000; 2) the facility is not located in a floodway; 3) the facility has not sustained major structural damage in a previous presidentially declared flooding disaster or emergency; and 4) the facility is not critical (e.g., the facility is not a hospital, generating plant, emergency operations center, or a facility that contains dangerous materials). FEMA intends to provide assistance for the restoration of these facilities to their pre-disaster condition, except that certain measures to mitigate the effects of future flooding or other hazards may be included in the work. For example, a bridge or culvert restoration may include a larger waterway opening to decrease the risk of future washouts.

For routine activities, this will be the only public notice provided. Other activities and those involving facilities that do not meet the four criteria are required to undergo more detailed review, including study of alternate locations. Subsequent public notices regarding such projects will be published if necessary, as more specific information becomes available.

In many cases, an applicant may have started facility restoration before federal involvement. Even if the facility must undergo detailed review and analysis of alternate locations, FEMA will fund eligible restoration at the original location if the facility is functionally dependent on its floodplain location (e.g., bridges and piers), or the

project facilitates an open space use, or the facility is an integral part of a larger network that is impractical or uneconomical to relocate, such as a road. In such cases, FEMA must also examine the possible effects of not restoring the facility, minimize floodplain/wetland impacts, and determine both that an overriding public need for the facility clearly outweighs the Executive Order requirements to avoid the floodplain/wetland, and that the site is the only practicable alternative. State of Texas and local officials will confirm to FEMA that proposed actions comply with all applicable state and local floodplain management and wetland protection requirements.

FEMA also intends to provide HMGP funding to the State of Texas to mitigate future disaster damages. These projects may include construction of new facilities, modification of existing, undamaged facilities, relocation of facilities out of floodplains, demolition of structures, or other types of projects to mitigate future disaster damages. In the course of developing project proposals, subsequent public notices will be published if necessary, as more specific information becomes available.

The National Historic Preservation Act requires federal agencies to take into account the effects of their undertakings on historic properties. Those actions or activities affecting buildings, structures, districts or objects 50 years or older or that affect archeological sites or undisturbed ground will require further review to determine if the property is eligible for listing in the National Register of Historic Places (Register). If the property is determined to be eligible for the Register, and FEMA's undertaking will adversely affect it, FEMA will provide additional public notices. For historic properties not adversely affected by FEMA's undertaking, this will be the only public notice.

As noted, this may be the only public notice regarding the above-described actions under the PA, IA, and HMGP programs. Interested persons may obtain information about these actions or a specific project by writing to Kevin Jaynes, Regional Environmental Officer,

Federal Emergency Management Agency, Region 6, 800 North Loop 288, Denton, TX 76209 or by emailing FEMA-R6-EHP@fema.dhs.gov. Comments should be sent in writing within 15 days of the date of this notice.

Last Updated: 03/22/2019 - 09:58

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 Official website of the Department of Homeland Security

Appeal Documents

May 7, 2020

Via Email

Mr. Bobby Wilkinson
Executive Director
Texas Department of Housing and Community Affairs
221 East 11th Street
Austin, Texas 78701

Re: The Cottages at Cedar Ridge, Elgin (20342)
Appeal for Scoring

Dear Bobby:

We represent the Applicant¹ for the Development referenced above, which has applied for 2020 Housing Tax Credits. This letter responds to the Notice of Scoring Adjustment issued April 30, 2020 in which TDHCA denied the Application's request for readiness to proceed points under §11.9(c)(8). Specifically, the letter stated:

On November 20, 2019, the Department posted a list of counties eligible for points under Readiness to Proceed that inadvertently included counties named in FEMA Declaration 4416 (see attached), which were eligible for public assistance but not for individual assistance. The Department posted a corrected list on November 22, 2019 (see attached). Because Travis County is not an eligible county, the Application is not eligible for the five (5) points requested under §11.9(c)(8), subject to your ability to appeal.

A. Our client believes Travis County is an eligible county under §11.9(c)(8).

Section 11.9(c)(8) provides that an Application may receive five points if the proposed Development is located in a county FEMA declared "to be eligible for individual assistance within three years preceeding December 1, 2019." The Development at issue is located in Travis County. At issue is FEMA's declaration that Travis County is eligible for individual assistance, first made on June 11, 2016 (the "**Initial Declaration**," attached hereto as Exhibit A). The Initial Declaration was subsequently amended nine times to include additional counties and clarify other administrative matters (collectively, the "**Amendments**," attached hereto as Exhibit B). The last of the Amendments is dated effective as of March 1, 2017. Because the Initial Declaration as amended by the Amendments is last dated in 2017, Travis County received a FEMA declaration

¹ Capitalized terms used but not defined in this letter shall have the meanings given them in the 2020 QAP.

within three years preceding December 1, 2019 and is an eligible county under §11.9(c)(8). Therefore, we respectfully ask that you restore these points.

B. Even if Travis County is not an eligible county under §11.9(c)(8), the Applicant relied on TDHCA's published guidance and therefore TDHCA should deem it eligible.

Nevertheless, even if you now determine Travis County is not an eligible county under the readiness to proceed rules, the Applicant relied on TDHCA's prior published guidance to the fact that it is. On November 20, 2019, TDHCA published a list of eligible counties under §11.9(c)(8) (the "**Eligible County List**"). The Eligible County List provided that Travis County was indeed eligible under §11.9(c)(8). TDHCA's Notice of Scoring Adjustment indicates that the Eligible County List was subsequently updated; however, before the new list was issued, our client had already begun acting on TDHCA's published guidance. To our client's knowledge no such eligible county list has ever been amended in this way. Because the Applicant relied on TDHCA's published guidance, it would be unfair to revoke the points obtained in reliance thereon, and we therefore respectfully ask that you restore these points.

Sincerely,



Cynthia L. Bast

cc: AHG Properties, LLC
TICO Development, LLC

Exhibit A -- Notice of Scoring Adjustment
Exhibit B -- Initial Declaration
Exhibit C -- Amendments

Exhibit A



TEXAS DEPARTMENT OF HOUSING AND COMMUNITY AFFAIRS

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Leo Vasquez, Member

April 30, 2020

Writer's direct dial: (512) 936-7834
Email: sharon.gamble@tdhca.state.tx.us

Lee Zieben
Cottages Cedar Ridge, Ltd.
1980 Post Oak Blvd., Ste. 2020
Houston, Texas 77056

RE: NOTICE OF SCORING ADJUSTMENT: 20342 THE COTTAGES AT CEDAR RIDGE, ELGIN

Dear Mr. Zieben:

The Texas Department of Housing and Community Affairs (the Department) is in receipt of the Application named above. Upon review, staff has determined that the Application does not qualify for points under 10 TAC §11.9(c)(8) of the 2020 Qualified Allocation Plan (QAP) related to Readiness to Proceed because the Development Site is not located in an eligible county. Per the rule:

(8) Readiness to proceed in disaster impacted counties. An Application for a proposed Development that is located in a county declared by the Federal Emergency Management Agency to be eligible for individual assistance within three years preceding December 1, 2019, that provides a certification that they will close all financing and fully execute the construction contract on or before the last business day of November or as otherwise permitted under subparagraph (C) of this paragraph.

On November 20, 2019, the Department posted a list of counties eligible for points under Readiness to Proceed that inadvertently included counties named in FEMA Declaration 4416 (see attached), which were eligible for public assistance but not for individual assistance. The Department posted a corrected list on November 22, 2019 (see attached). Because Travis County is not an eligible county, the Application is not eligible for the five (5) points requested under §11.9(c)(8), subject to your ability to appeal.

An appeals process exists for the Housing Tax Credit Program. The restrictions and requirements related to the filing of an appeal can be found in §11.902 of the 2020 QAP. If you wish to appeal this decision to the Executive Director, the appeal must be filed, in writing, with the Department not later than seven (7) calendar days after the date of this notification. Please review §11.902 of the 2020 QAP for full instruction on the appeals process. Please note that §11.902(f) of the 2020 QAP and Tex. Gov't

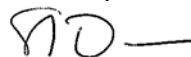


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April 30, 2020
Page 2

Code §2306.6715(c) limit Board review of an Application on appeal to the original Application and those documents contained within the Application.

If you have questions or require further information, please contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "SD" followed by a horizontal line.

Sharon D. Gamble

Competitive HTC Administrator

From: [TDHCA](#)
To: [Sharon Gamble](#)
Subject: TDHCA: Revised 2020 Multifamily Uniform Application Materials
Date: Friday, November 22, 2019 4:25:42 PM

The Texas Department of Housing and Community Affairs' (TDHCA) Multifamily Finance Division has posted revised 2020 Multifamily Uniform Application materials at <http://www.tdhca.state.tx.us/multifamily/apply-for-funds.htm>.

The 2020 List of Declared Disaster Areas posted on Wednesday, November 20, 2019, has been revised to incorporate the following:

10 TAC Section 11.9(c)(8), related to readiness to proceed in disaster impacted counties, requires that in order for a county to qualify an application for scoring under this item, the county must be declared by the Federal Emergency Management Agency (FEMA) to be eligible for individual assistance within three years preceding December 1, 2019. On February 25, 2019, FEMA issued major disaster declaration 4416-DR-TX, amended on March 29, 2019, which together designated 35 counties as eligible for public assistance, but not for individual assistance as required by the rule. The following counties were included in the 2020 List of Declared Disaster Areas in error:

Archer, Baylor, Brown, Burnet, Callahan, Comanche, Coryell, Dimmit, Edwards, Fannin, Franklin, Haskell, Hill, Hopkins, Houston, Jones, Kimble, Kinney, Knox, Llano, Madison, Mason, McCulloch, Menard, Nolan, Polk, Real, San Saba, Schleicher, Sutton, Throckmorton, Travis, Uvalde, and Val Verde.

Grimes County remains eligible because it is included under FEMA major disaster declaration 4332-DR-TX, which includes counties impacted by Hurricane Harvey. This revision does not affect the list of counties eligible for points under 10 TAC Section 11.9(d)(3), related to declared disaster areas.

The 2020 Draft Multifamily Uniform Application posted on Monday, November 18, 2019, has been revised to incorporate the following:

- Tab 6b, Multifamily Direct Loan (MFDL) Self Score, has been added. The form is only applicable if MFDL funds are requested and will self-populate based on scoring selections made throughout the Application. As with 9% housing tax credit applications, Applicants are not required to request points.

- Tab 17, Development Narrative, Section 6: the drop-down boxes under "Multifamily Direct Loan Only" (Y88 and AH88) were unlocked. The boxes are only applicable if MFDL funds are requested.

- Tab 19, Development Activities II, Section 3: a new MFDL scoring item, Subsidy per Unit, has been added. The item is only applicable if MFDL funds are requested.

The Payment Receipt posted on Wednesday, November 20, 2019, has been revised to add a selection box for the 4% HTC Certificate of Bond Reservation, which must be received by TDHCA before a 4% application can be accepted.

If you have questions about any of the posted documents, please contact TDHCA Competitive HTC Program Administrator Sharon Gamble at sharon.gamble@tdhca.state.tx.us.

Please do not reply to this email. It is from an unattended email address. To contact the Texas Department of Housing and Community Affairs, get more information, or view a slideshow of recent TDHCA activities, visit <http://www.tdhca.state.tx.us/> in your Web browser. Like us on facebook (<http://www.facebook.com/TDHCA>) and follow us on twitter (<http://twitter.com/TDHCA>).

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PUBLIC NOTICE FEMA 4416-DR-TX

 Navigation

 Search

 Languages

Individual Assistance
Declaration Factors

News

Date of Notice:

Friday, March 22, 2019

The Federal Emergency Management Agency (FEMA) hereby gives notice to the public of its intent to reimburse eligible applicants for eligible costs to repair and/or replace facilities damaged by Severe Storms and Flooding between September 10, 2019 to November 2, 2019. This notice applies to the Public Assistance (PA), Individual Assistance (IA), and Hazard Mitigation Grant (HMGP) programs implemented under the authority of the Robert T. Stafford Disaster Relief and Emergency Assistance Act, 42 U.S.C. §§ 5121-5207.

Under a major disaster declaration (FEMA 4416-DR-TX) signed by the President on February 25, 2019, the following counties have been designated adversely affected by the disaster **and eligible for Public Assistance:** Archer, Baylor, Brown, Burnet, Callahan, Comanche, Coryell, Dimmit, Edwards, Fannin, Franklin, Grimes, Haskell, Hill, Hopkins, Houston, Jones, Kimble, Kinney, Knox, Llano, Madison, Mason, McCulloch, Menard, Nolan, Real, San Saba, Sutton, Throckmorton, Travis, Uvalde, and Val Verde. Additional counties may be designated at a later date. All counties in the State of Texas are eligible for HMGP.

This public notice concerns activities that may affect historic properties, activities that are located in or affect wetland areas or the 100-year floodplain, and critical actions within the 500-year floodplain. Such activities may adversely affect the historic property, floodplain or wetland, or may result in continuing vulnerability to flood damage.

Presidential Executive Orders 11988 and 11990 require that all federal actions in or affecting the floodplain or wetlands be reviewed

for opportunities to relocate, and evaluated for social, economic, historical, environmental, legal and safety considerations. Where there is no opportunity to relocate, FEMA is required to undertake a detailed review to determine what measures can be taken to minimize future damages. The public is invited to participate in the process of identifying alternatives and analyzing their impacts through this notification.

FEMA has determined that for certain types of facilities there are normally no alternatives to restoration in the floodplain/wetland. These are facilities that meet all of the following criteria: 1) FEMA's estimate of the cost of repairs is less than 50-percent of the cost to replace the entire facility, and is less than \$100,000; 2) the facility is not located in a floodway; 3) the facility has not sustained major structural damage in a previous presidentially declared flooding disaster or emergency; and 4) the facility is not critical (e.g., the facility is not a hospital, generating plant, emergency operations center, or a facility that contains dangerous materials). FEMA intends to provide assistance for the restoration of these facilities to their pre-disaster condition, except that certain measures to mitigate the effects of future flooding or other hazards may be included in the work. For example, a bridge or culvert restoration may include a larger waterway opening to decrease the risk of future washouts.

For routine activities, this will be the only public notice provided. Other activities and those involving facilities that do not meet the four criteria are required to undergo more detailed review, including study of alternate locations. Subsequent public notices regarding such projects will be published if necessary, as more specific information becomes available.

In many cases, an applicant may have started facility restoration before federal involvement. Even if the facility must undergo detailed review and analysis of alternate locations, FEMA will fund eligible restoration at the original location if the facility is functionally dependent on its floodplain location (e.g., bridges and piers), or the

project facilitates an open space use, or the facility is an integral part of a larger network that is impractical or uneconomical to relocate, such as a road. In such cases, FEMA must also examine the possible effects of not restoring the facility, minimize floodplain/wetland impacts, and determine both that an overriding public need for the facility clearly outweighs the Executive Order requirements to avoid the floodplain/wetland, and that the site is the only practicable alternative. State of Texas and local officials will confirm to FEMA that proposed actions comply with all applicable state and local floodplain management and wetland protection requirements.

FEMA also intends to provide HMGP funding to the State of Texas to mitigate future disaster damages. These projects may include construction of new facilities, modification of existing, undamaged facilities, relocation of facilities out of floodplains, demolition of structures, or other types of projects to mitigate future disaster damages. In the course of developing project proposals, subsequent public notices will be published if necessary, as more specific information becomes available.

The National Historic Preservation Act requires federal agencies to take into account the effects of their undertakings on historic properties. Those actions or activities affecting buildings, structures, districts or objects 50 years or older or that affect archeological sites or undisturbed ground will require further review to determine if the property is eligible for listing in the National Register of Historic Places (Register). If the property is determined to be eligible for the Register, and FEMA's undertaking will adversely affect it, FEMA will provide additional public notices. For historic properties not adversely affected by FEMA's undertaking, this will be the only public notice.

As noted, this may be the only public notice regarding the above-described actions under the PA, IA, and HMGP programs. Interested persons may obtain information about these actions or a specific project by writing to Kevin Jaynes, Regional Environmental Officer,

Federal Emergency Management Agency, Region 6, 800 North Loop 288, Denton, TX 76209 or by emailing FEMA-R6-EHP@fema.dhs.gov. Comments should be sent in writing within 15 days of the date of this notice.

Last Updated: 03/22/2019 - 09:58

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Inspector General](#) [Strategic Plan](#) [Whitehouse.gov](#) [DHS.gov](#)
[Ready.gov](#) [USA.gov](#) [DisasterAssistance.gov](#)



 Official website of the Department of Homeland Security

Exhibit B



FEMA Initial Notice

(/)

Date of Notice:

Navigation

Saturday, June 11, 2016
Billing Code 9111-23-P

Search

DEPARTMENT OF HOMELAND SECURITY

Languages

Federal Emergency Management Agency

[Internal Agency Docket No. FEMA-4272-DR]

Texas Severe
Storms and
Flooding (DR-4272)
(/disaster/4272)

Docket ID FEMA-2016-0001

Designated Areas
(/disaster/4272/designated-
areas)

Texas; Major Disaster and Related Determinations

AGENCY: Federal Emergency Management Agency, DHS.

Disaster Federal
Register Notices
(/disaster/4272/notices)

ACTION: Notice.

Individual
Assistance
Declaration Factors
(/individual-
assistance-
declaration-factors)

SUMMARY: This is a notice of the Presidential declaration of a major disaster for the State of Texas (FEMA-4272-DR), dated June 11, 2016, and related determinations.

FOIA Statistics
(/disaster/4272/foia)

EFFECTIVE DATE: June 11, 2016.

News
(/disaster/4272/updates-
blog-and-news)

FOR FURTHER INFORMATION CONTACT: Dean Webster,
Office of Response and Recovery, Federal Emergency
Management Agency, 500 C Street, SW, Washington, DC
20472, (202) 646-2833.

SUPPLEMENTARY INFORMATION: Notice is hereby given that, in a letter dated June 11, 2016, the President issued a major disaster declaration under the authority of the Robert T. Stafford Disaster Relief and Emergency Assistance Act, 42 U.S.C. 5121 *et seq.* (the "Stafford Act"), as follows:

I have determined that the damage in certain areas of the State of Texas resulting from severe storms and flooding beginning on May 26, 2016, and continuing, is of sufficient severity and magnitude to warrant a major disaster declaration under the Robert T. Stafford Disaster Relief and Emergency Assistance Act, 42 U.S.C. 5121 *et seq.* (the "Stafford Act"). Therefore, I declare that such a major disaster exists in the State of Texas.

In order to provide Federal assistance, you are hereby authorized to allocate from funds available for these purposes such amounts as you find necessary for Federal disaster assistance and administrative expenses.

You are authorized to provide Individual Assistance and assistance for emergency protective measures (Category B) under the Public Assistance program in the designated areas, Hazard Mitigation throughout the State, and any other forms of assistance under the Stafford Act that you deem appropriate subject to completion of Preliminary Damage Assessments (PDAs). Direct Federal assistance is authorized.

Consistent with the requirement that Federal assistance is supplemental, any Federal funds provided under the Stafford Act for Hazard Mitigation and Other Needs Assistance will be limited to 75 percent of the total eligible costs. Federal funds provided under the Stafford Act for Public Assistance also will be limited to 75 percent of the total eligible costs, with the exception of projects that meet the eligibility criteria for a higher Federal cost-sharing percentage under the Public Assistance Alternative Procedures Pilot Program for Debris Removal implemented pursuant to section 428 of the Stafford Act.

Further, you are authorized to make changes to this declaration for the approved assistance to the extent allowable under the Stafford Act.

The time period prescribed for the implementation of section 310(a), Priority to Certain Applications for Public Facility and Public Housing Assistance, 42 U.S.C. 5153, shall be for a period not to exceed six months after the date of this declaration.

The Federal Emergency Management Agency (FEMA) hereby gives notice that pursuant to the authority vested in the Administrator, under Executive Order 12148, as amended, William J. Doran III, of FEMA is appointed to act as the Federal Coordinating Officer for this major disaster.

The following areas of the State of Texas have been designated as adversely affected by this major disaster:

Austin, Brazoria, Brazos, Fort Bend, Grimes, Hidalgo, Hood, Montgomery, San Jacinto, Travis, Waller, and Washington Counties for Individual Assistance.

Austin, Brazoria, Brazos, Fort Bend, Grimes, Hidalgo, Hood, Montgomery, San Jacinto, Travis, Waller, and Washington Counties for emergency protective measures (Category B), including direct federal assistance, under the Public Assistance program.

All areas within the State of Texas are eligible for assistance under the Hazard Mitigation Grant Program.

The following Catalog of Federal Domestic Assistance Numbers (CFDA) are to be used for reporting and drawing funds: 97.030, Community Disaster Loans; 97.031, Cora Brown Fund; 97.032, Crisis Counseling; 97.033, Disaster Legal Services; 97.034, Disaster Unemployment Assistance (DUA); 97.046, Fire Management Assistance Grant; 97.048, Disaster Housing Assistance to Individuals and Households In Presidentially Declared Disaster Areas; 97.049, Presidentially Declared Disaster Assistance - Disaster Housing Operations for Individuals and Households; 97.050, Presidentially Declared Disaster Assistance to Individuals and Households - Other Needs; 97.036, Disaster Grants - Public Assistance (Presidentially Declared Disasters); 97.039, Hazard Mitigation Grant.

/s/

W. Craig Fugate,

Administrator,

Federal Emergency Management Agency.

Last Updated: 06/13/2016 - 15:13

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<https://www.oig.dhs.gov/hotline>

 Official website of the Department of Homeland Security

Exhibit C



FEMA Amendment No. 1

(/)

Date of Notice:

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Wednesday, June 22, 2016
Billing Code 9111-23-P

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DEPARTMENT OF HOMELAND SECURITY

Languages

Federal Emergency Management Agency

[Internal Agency Docket No. FEMA-4272-DR]

Texas Severe
Storms and
Flooding (DR-4272)
(/disaster/4272)

Docket ID FEMA-2016-0001

Designated Areas
(/disaster/4272/designated-
areas)

Texas; Amendment No. 1 to Notice of a Major Disaster
Declaration

Disaster Federal
Register Notices
(/disaster/4272/notices)

AGENCY: Federal Emergency Management Agency, DHS.

Individual
Assistance
Declaration Factors
(/individual-
assistance-
declaration-factors)

ACTION: Notice.

FOIA Statistics
(/disaster/4272/foia)

SUMMARY: This notice amends the notice of a major
disaster declaration for the State of Texas (FEMA-4272-
DR), dated June 11, 2016, and related determinations.

News
(/disaster/4272/updates-
blog-and-news)

EFFECTIVE DATE: June 22, 2016.

FOR FURTHER INFORMATION CONTACT: Dean Webster,
Office of Response and Recovery, Federal Emergency
Management Agency, 500 C Street, SW, Washington, DC
20472, (202) 646-2833.

SUPPLEMENTARY INFORMATION: The notice of a major disaster declaration for the State of Texas is hereby amended to include the following areas among those areas determined to have been adversely affected by the event declared a major disaster by the President in his declaration of June 11, 2016.

Bastrop, Burleson, Eastland, Lee, Liberty, Stephens, and Tyler Counties for Individual Assistance.

The following Catalog of Federal Domestic Assistance Numbers (CFDA) are to be used for reporting and drawing funds: 97.030, Community Disaster Loans; 97.031, Cora Brown Fund; 97.032, Crisis Counseling; 97.033, Disaster Legal Services; 97.034, Disaster Unemployment Assistance (DUA); 97.046, Fire Management Assistance Grant; 97.048, Disaster Housing Assistance to Individuals and Households In Presidentially Declared Disaster Areas; 97.049, Presidentially Declared Disaster Assistance - Disaster Housing Operations for Individuals and Households; 97.050 Presidentially Declared Disaster Assistance to Individuals and Households - Other Needs; 97.036, Disaster Grants - Public Assistance (Presidentially Declared Disasters); 97.039, Hazard Mitigation Grant.

/s/

W. Craig Fugate,

Administrator,

Federal Emergency Management Agency.

Last Updated: 06/22/2016 - 16:06

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 Official website of the Department of Homeland Security



FEMA Amendment No. 2

(/)

Date of Notice:

Navigation

Friday, June 24, 2016
Billing Code 9111-23-P

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DEPARTMENT OF HOMELAND SECURITY

Languages

Federal Emergency Management Agency

[Internal Agency Docket No. FEMA-4272-DR]

Texas Severe
Storms and
Flooding (DR-4272)
(/disaster/4272)

Docket ID FEMA-2016-0001

Designated Areas
(/disaster/4272/designated-
areas)

Texas; Amendment No. 2 to Notice of a Major Disaster
Declaration

Disaster Federal
Register Notices
(/disaster/4272/notices)

AGENCY: Federal Emergency Management Agency, DHS.

Individual
Assistance
Declaration Factors
(/individual-
assistance-
declaration-factors)

ACTION: Notice.

FOIA Statistics
(/disaster/4272/foia)

SUMMARY: This notice amends the notice of a major
disaster declaration for the State of Texas (FEMA-4272-
DR), dated

News
(/disaster/4272/updates-
blog-and-news)

June 11, 2016, and related determinations.

EFFECTIVE DATE: June 24, 2016.

FOR FURTHER INFORMATION CONTACT: Dean Webster,
Office of Response and Recovery, Federal Emergency
Management Agency, 500 C Street, SW, Washington, DC
20472, (202) 646-2833.

SUPPLEMENTARY INFORMATION: Notice is hereby given that the incident period for this disaster is closed effective June 24, 2016.

The following Catalog of Federal Domestic Assistance Numbers (CFDA) are to be used for reporting and drawing funds: 97.030, Community Disaster Loans; 97.031, Cora Brown Fund; 97.032, Crisis Counseling; 97.033, Disaster Legal Services; 97.034, Disaster Unemployment Assistance (DUA); 97.046, Fire Management Assistance Grant; 97.048, Disaster Housing Assistance to Individuals and Households In Presidentially Declared Disaster Areas; 97.049, Presidentially Declared Disaster Assistance - Disaster Housing Operations for Individuals and Households; 97.050, Presidentially Declared Disaster Assistance to Individuals and Households - Other Needs; 97.036, Disaster Grants - Public Assistance (Presidentially Declared Disasters); 97.039, Hazard Mitigation Grant.

/s/

W. Craig Fugate,

Administrator,

Federal Emergency Management Agency.

Last Updated: 06/24/2016 - 14:09



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FEMA Amendment No. 3

(/)

Date of Notice:

Navigation

Wednesday, June 29, 2016
Billing Code 9111-23-P

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DEPARTMENT OF HOMELAND SECURITY

Languages

Federal Emergency Management Agency

[Internal Agency Docket No. FEMA-4272-DR]

Texas Severe
Storms and
Flooding (DR-4272)
(/disaster/4272)

Docket ID FEMA-2016-0001

Designated Areas
(/disaster/4272/designated-
areas)

Texas; Amendment No. 3 to Notice of a Major Disaster
Declaration

Disaster Federal
Register Notices
(/disaster/4272/notices)

AGENCY: Federal Emergency Management Agency, DHS.

Individual
Assistance
Declaration Factors
(/individual-
assistance-
declaration-factors)

ACTION: Notice.

FOIA Statistics
(/disaster/4272/foia)

SUMMARY: This notice amends the notice of a major
disaster declaration for the State of Texas (FEMA-4272-
DR), dated June 11, 2016, and related determinations.

News
(/disaster/4272/updates-
blog-and-news)

EFFECTIVE DATE: June 29, 2016.

FOR FURTHER INFORMATION CONTACT: Dean Webster,
Office of Response and Recovery, Federal Emergency
Management Agency, 500 C Street, SW, Washington, DC
20472, (202) 646-2833.

SUPPLEMENTARY INFORMATION: The notice of a major disaster declaration for the State of Texas is hereby amended to include the following areas among those areas determined to have been adversely affected by the event declared a major disaster by the President in his declaration of June 11, 2016.

Fayette, Harris, Kleberg, Palo Pinto, and Parker Counties for Individual Assistance.

The following Catalog of Federal Domestic Assistance Numbers (CFDA) are to be used for reporting and drawing funds: 97.030, Community Disaster Loans; 97.031, Cora Brown Fund; 97.032, Crisis Counseling; 97.033, Disaster Legal Services; 97.034, Disaster Unemployment Assistance (DUA); 97.046, Fire Management Assistance Grant; 97.048, Disaster Housing Assistance to Individuals and Households In Presidentially Declared Disaster Areas; 97.049, Presidentially Declared Disaster Assistance - Disaster Housing Operations for Individuals and Households; 97.050 Presidentially Declared Disaster Assistance to Individuals and Households - Other Needs; 97.036, Disaster Grants - Public Assistance (Presidentially Declared Disasters); 97.039, Hazard Mitigation Grant.

/s/

W. Craig Fugate,

Administrator,

Federal Emergency Management Agency.

Last Updated: 06/29/2016 - 18:51

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 Official website of the Department of Homeland Security



FEMA Amendment No. 4

(/)

Date of Notice:

Navigation

Friday, July 8, 2016
Billing Code 9111-23-P

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DEPARTMENT OF HOMELAND SECURITY

Languages

Federal Emergency Management Agency

[Internal Agency Docket No. FEMA-4272-DR]

Texas Severe
Storms and
Flooding (DR-4272)
(/disaster/4272)

Docket ID FEMA-2016-0001

Designated Areas
(/disaster/4272/designated-
areas)

Texas; Amendment No. 4 to Notice of a Major Disaster
Declaration

Disaster Federal
Register Notices
(/disaster/4272/notices)

AGENCY: Federal Emergency Management Agency, DHS.

Individual
Assistance
Declaration Factors
(/individual-
assistance-
declaration-factors)

ACTION: Notice.

FOIA Statistics
(/disaster/4272/foia)

SUMMARY: This notice amends the notice of a major
disaster declaration for the State of Texas (FEMA-4272-
DR), dated June 11, 2016, and related determinations.

News
(/disaster/4272/updates-
blog-and-news)

EFFECTIVE DATE: July 8, 2016.

FOR FURTHER INFORMATION CONTACT: Dean Webster,
Office of Response and Recovery, Federal Emergency
Management Agency, 500 C Street, SW, Washington, DC
20472, (202) 646-2833.

SUPPLEMENTARY INFORMATION: The notice of a major disaster declaration for the State of Texas is hereby amended to include the following areas among those areas determined to have been adversely affected by the event declared a major disaster by the President in his declaration of June 11, 2016.

Bandera, Brown, Caldwell, Houston, Jasper, and Polk Counties for Public Assistance.

Bastrop, Eastland, Fayette, and Kleberg Counties for Public Assistance (already designated for Individual Assistance.)

Fort Bend, Grimes, Hood, San Jacinto, and Washington Counties for Public Assistance [Categories A and C-G] (already designated for Individual Assistance and emergency protective measures [Category B], including direct federal assistance, under the Public Assistance program.)

The following Catalog of Federal Domestic Assistance Numbers (CFDA) are to be used for reporting and drawing funds: 97.030, Community Disaster Loans; 97.031, Cora Brown Fund; 97.032, Crisis Counseling; 97.033, Disaster Legal Services; 97.034, Disaster Unemployment Assistance (DUA); 97.046, Fire Management Assistance Grant; 97.048, Disaster Housing Assistance to Individuals and Households In Presidentially Declared Disaster Areas; 97.049, Presidentially Declared Disaster Assistance - Disaster Housing Operations for Individuals and Households; 97.050 Presidentially Declared Disaster Assistance to Individuals and

Households - Other Needs; 97.036, Disaster Grants - Public Assistance (Presidentially Declared Disasters); 97.039, Hazard Mitigation Grant.

/s/

W. Craig Fugate,

Administrator,

Federal Emergency Management Agency.

Last Updated: 07/08/2016 - 15:48

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FEMA Amendment No. 5

(/)

Date of Notice:

Navigation

Wednesday, July 20, 2016
Billing Code 9111-23-P

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DEPARTMENT OF HOMELAND SECURITY

Languages

Federal Emergency Management Agency

[Internal Agency Docket No. FEMA-4272-DR]

Texas Severe
Storms and
Flooding (DR-4272)
(/disaster/4272)

Docket ID FEMA-2016-0001

Designated Areas
(/disaster/4272/designated-
areas)

Texas; Amendment No. 5 to Notice of a Major Disaster
Declaration

Disaster Federal
Register Notices
(/disaster/4272/notices)

AGENCY: Federal Emergency Management Agency, DHS.

Individual
Assistance
Declaration Factors
(/individual-
assistance-
declaration-factors)

ACTION: Notice.

FOIA Statistics
(/disaster/4272/foia)

SUMMARY: This notice amends the notice of a major
disaster declaration for the State of Texas (FEMA-4272-
DR), dated June 11, 2016, and related determinations.

News
(/disaster/4272/updates-
blog-and-news)

EFFECTIVE DATE: July 20, 2016.

FOR FURTHER INFORMATION CONTACT: Dean Webster,
Office of Response and Recovery, Federal Emergency
Management Agency, 500 C Street, SW, Washington, DC
20472, (202) 646-2833.

SUPPLEMENTARY INFORMATION: The notice of a major disaster declaration for the State of Texas is hereby amended to include the following areas among those areas determined to have been adversely affected by the event declared a major disaster by the President in his declaration of June 11, 2016.

Bosque, Callahan, Coleman, Comanche, Erath, Falls, Fisher, Leon, Madison, Somervell, Trinity, and Walker Counties for Public Assistance.

Lee, Palo Pinto, Stephens, and Tyler Counties for Public Assistance (already designated for Individual Assistance.)

Brazos County for Public Assistance [Categories A and C-G] (already designated for Individual Assistance and emergency protective measures [Category B], including direct federal assistance, under the Public Assistance program.)

The following Catalog of Federal Domestic Assistance Numbers (CFDA) are to be used for reporting and drawing funds: 97.030, Community Disaster Loans; 97.031, Cora Brown Fund; 97.032, Crisis Counseling; 97.033, Disaster Legal Services; 97.034, Disaster Unemployment Assistance (DUA); 97.046, Fire Management Assistance Grant; 97.048, Disaster Housing Assistance to Individuals and Households In Presidentially Declared Disaster Areas; 97.049, Presidentially Declared Disaster Assistance - Disaster Housing Operations for Individuals and Households; 97.050 Presidentially Declared Disaster Assistance to Individuals and

Households - Other Needs; 97.036, Disaster Grants -
Public Assistance (Presidentially Declared Disasters);
97.039, Hazard Mitigation Grant.

/s/

W. Craig Fugate,

Administrator,

Federal Emergency Management Agency.

Last Updated: 07/21/2016 - 12:13

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FEMA Amendment No. 6

(/)

Date of Notice:

Navigation

Monday, July 25, 2016
Billing Code 9111-23-P

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DEPARTMENT OF HOMELAND SECURITY

Languages

Federal Emergency Management Agency

[Internal Agency Docket No. FEMA-4272-DR]

Texas Severe
Storms and
Flooding (DR-4272)
(/disaster/4272)

Docket ID FEMA-2016-0001

Designated Areas
(/disaster/4272/designated-
areas)

Texas; Amendment No. 6 to Notice of a Major Disaster
Declaration

Disaster Federal
Register Notices
(/disaster/4272/notices)

AGENCY: Federal Emergency Management Agency, DHS.

Individual
Assistance
Declaration Factors
(/individual-
assistance-
declaration-factors)

ACTION: Notice.

FOIA Statistics
(/disaster/4272/foia)

SUMMARY: This notice amends the notice of a major
disaster declaration for the State of Texas (FEMA-4272-
DR), dated June 11, 2016, and related determinations.

News
(/disaster/4272/updates-
blog-and-news)

EFFECTIVE DATE: July 25, 2016.

FOR FURTHER INFORMATION CONTACT: Dean Webster,
Office of Response and Recovery, Federal Emergency
Management Agency, 500 C Street, SW, Washington, DC
20472, (202) 646-2833.

SUPPLEMENTARY INFORMATION: The notice of a major disaster declaration for the State of Texas is hereby amended to include the following areas among those areas determined to have been adversely affected by the event declared a major disaster by the President in his declaration of June 11, 2016.

Hardin, Navarro, and Throckmorton Counties for Public Assistance.

Burleson and Liberty Counties for Public Assistance (already designated for Individual Assistance.)

Austin, Brazoria, Montgomery, and Waller Counties for Public Assistance [Categories A and C-G] (already designated for Individual Assistance and emergency protective measures [Category B], including direct federal assistance, under the Public Assistance program.)

The following Catalog of Federal Domestic Assistance Numbers (CFDA) are to be used for reporting and drawing funds: 97.030, Community Disaster Loans; 97.031, Cora Brown Fund; 97.032, Crisis Counseling; 97.033, Disaster Legal Services; 97.034, Disaster Unemployment Assistance (DUA); 97.046, Fire Management Assistance Grant; 97.048, Disaster Housing Assistance to Individuals and Households In Presidentially Declared Disaster Areas; 97.049, Presidentially Declared Disaster Assistance - Disaster Housing Operations for Individuals and Households; 97.050 Presidentially Declared Disaster Assistance to Individuals and

Households - Other Needs; 97.036, Disaster Grants -
Public Assistance (Presidentially Declared Disasters);
97.039, Hazard Mitigation Grant.

/s/

W. Craig Fugate,

Administrator,

Federal Emergency Management Agency.

Last Updated: 07/25/2016 - 11:26

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FEMA Amendment No. 7

(/)

Navigation	Date of Notice: Monday, August 1, 2016 Billing Code 9111-23-P
Search	DEPARTMENT OF HOMELAND SECURITY
Languages	Federal Emergency Management Agency
Texas Severe Storms and Flooding (DR-4272) (/disaster/4272)	[Internal Agency Docket No. FEMA-4272-DR] Docket ID FEMA-2016-0001
Designated Areas (/disaster/4272/designated-areas)	Texas; Amendment No. 7 to Notice of a Major Disaster Declaration
Disaster Federal Register Notices (/disaster/4272/notices)	AGENCY: Federal Emergency Management Agency, DHS.
Individual Assistance Declaration Factors (/individual-assistance-declaration-factors)	ACTION: Notice. SUMMARY: This notice amends the notice of a major disaster for the State of Texas (FEMA-4272-DR), dated June 11, 2016, and related determinations.
FOIA Statistics (/disaster/4272/foia)	EFFECTIVE DATE: August 1, 2016
News (/disaster/4272/updates-blog-and-news)	FOR FURTHER INFORMATION CONTACT: Dean Webster, Office of Response and Recovery, Federal Emergency Management Agency, 500 C Street, SW, Washington, DC 20472, (202) 646-2833.

SUPPLEMENTARY INFORMATION: Notice is hereby given that the incident period for this declared disaster is now May 22, 2016, through and including June 24, 2016.

The following Catalog of Federal Domestic Assistance Numbers (CFDA) are to be used for reporting and drawing funds: 97.030, Community Disaster Loans; 97.031, Cora Brown Fund; 97.032, Crisis Counseling; 97.033, Disaster Legal Services; 97.034, Disaster Unemployment Assistance (DUA); 97.046, Fire Management Assistance Grant; 97.048, Disaster Housing Assistance to Individuals and Households In Presidentially Declared Disaster Areas; 97.049, Presidentially Declared Disaster Assistance - Disaster Housing Operations for Individuals and Households; 97.050, Presidentially Declared Disaster Assistance to Individuals and Households - Other Needs; 97.036, Disaster Grants - Public Assistance (Presidentially Declared Disasters); 97.039, Hazard Mitigation Grant.

/s/

W. Craig Fugate,

Administrator,

Federal Emergency Management Agency.

Last Updated: 08/01/2016 - 17:01

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FEMA Amendment No. 8

[\(U\)](#)

	Date of Notice:
Navigation	Monday, August 1, 2016 Billing Code 9111-23-P
Search	DEPARTMENT OF HOMELAND SECURITY
Languages	Federal Emergency Management Agency
	[Internal Agency Docket No. FEMA-4272-DR]
Texas Severe Storms and Flooding (DR-4272) (/disaster/4272)	Docket ID FEMA-2016-0001
Designated Areas (/disaster/4272/designated-areas)	Texas; Amendment No. 8 to Notice of a Major Disaster Declaration
Disaster Federal Register Notices (/disaster/4272/notices)	AGENCY: Federal Emergency Management Agency, DHS.
Individual Assistance Declaration Factors (/individual-assistance-declaration-factors)	ACTION: Notice.
FOIA Statistics (/disaster/4272/foia)	SUMMARY: This notice amends the notice of a major disaster declaration for the State of Texas (FEMA-4272-DR), dated June 11, 2016, and related determinations.
News (/disaster/4272/updates-blog-and-news)	EFFECTIVE DATE: August 1, 2016.
	FOR FURTHER INFORMATION CONTACT: Dean Webster, Office of Response and Recovery, Federal Emergency Management Agency, 500 C Street, SW, Washington, DC 20472, (202) 646-2833.

SUPPLEMENTARY INFORMATION: The notice of a major disaster declaration for the State of Texas is hereby amended to include the following area among those areas determined to have been adversely affected by the event declared a major disaster by the President in his declaration of June 11, 2016.

Hall County for Public Assistance.

The following Catalog of Federal Domestic Assistance Numbers (CFDA) are to be used for reporting and drawing funds: 97.030, Community Disaster Loans; 97.031, Cora Brown Fund; 97.032, Crisis Counseling; 97.033, Disaster Legal Services; 97.034, Disaster Unemployment Assistance (DUA); 97.046, Fire Management Assistance Grant; 97.048, Disaster Housing Assistance to Individuals and Households In Presidentially Declared Disaster Areas; 97.049, Presidentially Declared Disaster Assistance - Disaster Housing Operations for Individuals and Households; 97.050 Presidentially Declared Disaster Assistance to Individuals and Households - Other Needs; 97.036, Disaster Grants - Public Assistance (Presidentially Declared Disasters); 97.039, Hazard Mitigation Grant.

/s/

W. Craig Fugate,

Administrator,

Federal Emergency Management Agency.

Last Updated: 08/01/2016 - 17:05

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FEMA Amendment No. 9

[\(U\)](#)

Date of Notice:

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Wednesday, March 1, 2017
Billing Code 91111-23-P

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DEPARTMENT OF HOMELAND SECURITY

[Languages](#)

Federal Emergency Management Agency

[Internal Agency Docket No. FEMA-4272-DR]

[Texas Severe
Storms and
Flooding \(DR-4272\)
\(/disaster/4272\)](#)

Docket ID FEMA-2017-0001

[Designated Areas
\(/disaster/4272/designated-
areas\)](#)

Texas; Amendment No. 9 to Notice of a Major Disaster
Declaration

[Disaster Federal
Register Notices
\(/disaster/4272/notices\)](#)

AGENCY: Federal Emergency Management Agency, DHS.

[Individual
Assistance
Declaration Factors
\(/individual-
assistance-
declaration-factors\)](#)

ACTION: Notice.

[FOIA Statistics
\(/disaster/4272/foia\)](#)

SUMMARY: This notice amends the notice of a major
disaster declaration for State of Texas (FEMA-4272-DR),
dated June 11, 2016, and related determinations.

[News
\(/disaster/4272/updates-
blog-and-news\)](#)

EFFECTIVE DATE: March 1, 2017.

FOR FURTHER INFORMATION CONTACT: Dean Webster,
Office of Response and Recovery, Federal Emergency
Management Agency, 500 C Street, SW, Washington, DC
20472, (202) 646-2833.

SUPPLEMENTARY INFORMATION: The Federal Emergency Management Agency (FEMA) hereby gives notice that pursuant to the authority vested in the Administrator, under Executive Order 12148, as amended, Jerry S. Thomas, of FEMA is appointed to act as the Federal Coordinating Officer for this disaster.

This action terminates the appointment of William J. Doran III as Federal Coordinating Officer for this disaster.

The following Catalog of Federal Domestic Assistance Numbers (CFDA) are to be used for reporting and drawing funds: 97.030, Community Disaster Loans; 97.031, Cora Brown Fund; 97.032, Crisis Counseling; 97.033, Disaster Legal Services; 97.034, Disaster Unemployment Assistance (DUA); 97.046, Fire Management Assistance Grant; 97.048, Disaster Housing Assistance to Individuals and Households In Presidentially Declared Disaster Areas; 97.049, Presidentially Declared Disaster Assistance - Disaster Housing Operations for Individuals and Households; 97.050, Presidentially Declared Disaster Assistance to Individuals and Households - Other Needs; 97.036, Disaster Grants - Public Assistance (Presidentially Declared Disasters); 97.039, Hazard Mitigation Grant.

/s/

Robert J. Fenton,

Acting Administrator,

Federal Emergency Management Agency.

Last Updated: 03/13/2017 - 12:30

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May 12, 2020

Writer's direct dial: (512) 475-3296
Email: bobby.wilkinson@tdhca.state.tx.us

Cynthia L. Bast
Locke Lord
600 Congress, Ste. 2200
Austin Texas 78701

RE: SCORING APPEAL RESPONSE FOR 20342 THE COTTAGES AT CEDAR RIDGE, ELGIN

Dear Ms. Bast:

The Texas Department of Housing and Community Affairs received your appeal dated May 7, 2020, regarding scoring for the Application named above. Staff found that the Application did not qualify for five points under 10 TAC §11.9(d)(8) related to Readiness to Proceed in a disaster impacted county (RTP) because the Application is located in Travis County, which is not an eligible county under the rule. The previously published application score was reduced by five points, pending the Applicant's ability to appeal.

Per the rule, in order to qualify for points under RTP, the Development Site must be located in a county declared by the Federal Emergency Management Agency (FEMA) to be eligible for individual assistance within three years preceding December 1, 2019. Per the appeal, Travis County was included in FEMA declaration 4416-DR-TX, issued on March 22, 2016. The declaration was amended nine times: twice to adjust the incident period to May 22, 2016, through June 24, 2016; six times to add counties to the declaration, and on August 1, 2016, and March 1, 2017, to indicate a change in FEMA personnel. The appeal suggests that each of these amendments amounts to a new declaration, so that Travis County was "declared" to be in a disaster area on March 1, 2017, and therefore within the time frame required by the rule. The appeal also asserts that "[e]ven if Travis County is not an eligible county under §11.9(c)(8), the Applicant relied on TDHCA's published guidance and therefore TDHCA should deem it eligible."

After reviewing the appeal, I have determined that Travis County was declared to be in a disaster area on March 22, 2016. While the amendments established different dates of declaration for the counties subsequently added, they did not change the declaration date for Travis County. That date



remains March 22, 2016, which is outside the time frame contemplated by the rule. It is also clear to me that while on November 20, 2019, Staff published a list of counties eligible for points under RTP that included Travis County in error, Staff also posted a corrected list two days later on November 22, 2019, and followed the posting that same day with a list serve announcement explaining the change. Per 10 TAC §11.1(b) related to Due Diligence and Applicant Responsibility:

Department staff may, from time to time, make available for use by Applicants information and informal guidance in the form of reports and responses to specific questions. The Department encourages communication with staff in order to clarify any issues that may not be fully addressed in the QAP, or may be unclear when applied to specific facts. However, while these resources are offered to help Applicants prepare and submit accurate information, Applicants should also appreciate that this type of guidance is limited by its nature, and that staff will apply the rules of the QAP to each specific situation as it is presented in the submitted Application.

Because the appeal did not provide clear evidence that Travis County was declared by FEMA to be eligible for individual assistance within three years preceding December 1, 2019, I find that Staff was correct in concluding that the Application does not qualify for five points under §11.9(c)(8) related to RTP. Accordingly, I am denying the appeal. If you are not satisfied with this decision, you may file a further appeal with the Board of Directors of the Texas Department of Housing and Community Affairs. Please review §11.902 of the 2020 QAP for full instruction on the appeals process. Please note that §11.902(f) of the 2020 QAP and Tex. Gov't Code §2306.6715(c) limit Board review of an Application on appeal to the original Application and those documents contained within the Application.

If you have any questions or require further information, please contact Marni Holloway, Multifamily Finance Director, at marni.holloway@tdhca.state.tx.us.

Sincerely,



Bobby Wilkinson
Executive Director