

TEXAS DEPARTMENT OF HOUSING AND COMMUNITY AFFAIRS
**TDHCA Governing Board Approved Draft Amendment of
2017 State of Texas Consolidated Plan: One-Year Action Plan**

Disclaimer

Attached is a draft amendment of **2017 State of Texas Consolidated Plan: One-Year Action Plan** that was approved by the TDHCA Governing Board on September 7, 2017. Notification of public comment for this document is scheduled to be published in the September 15, 2017 edition of the *Texas Register*.

Public Comment

Public Comment Period: Starts: on September 8, 2017 Ends: 6:00pm Austin local time on October 8, 2017.

Comments received after 6:00pm Austin local time on October 8, 2017 will not be accepted.

Written comments may be submitted, in hard copy/fax or electronic formats to:

Texas Department of Housing and Community Affairs
Attn: Housing Resource Center
P.O. Box 13941
Austin, Texas 78711-3941
Fax: 512-475-0070
Email: info@tdhca.state.tx.us

Written comments may be submitted in hard copy, fax, or email formats within the designated public comment period. Those making public comment are encouraged to reference the specific draft rule, policy, or plan related to their comment as well as a specific reference or cite associated with each comment.

Please be aware that all comments submitted to the TDHCA will be considered public information.

TEXAS DEPARTMENT OF HOUSING AND COMMUNITY AFFAIRS

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Draft amendment of the 2017 OYAP

The following sections from the final 2017 OYAP have been amended in this document in order to add citizen participation information related to fair housing found at 24 CFR §91.115:

- **AP-05 Executive Summary:** contains minor edits explaining the purpose of the amendment and listing the public comment period dates.
- **AP-10 Consultation:** Much of the required AFH information has been added to the Narrative section at the end of AP-10, as character counts are full in other sections.
- **AP-12 Participation:** minor edits have been made in AP-12 for AFH. Much detail has been added to the annual outreach chart.

Edits made here will be carried forward to the Draft 2018 OYAP, also under development.

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 in dialogue 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”) will be available to the public online at <http://www.tdhca.state.tx.us> and will have materials accessible to persons with disabilities, upon request.

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, the State is undertaking to update the Citizen Participation Plan and Language Access Plan, as the State works towards the development of the Assessment of Fair Housing, anticipated to be due to HUD in approximately May 2019. [This amendment to the 2017 OYAP provides an update of the Citizen Participation Plan to describe consultation and citizen participation actions to affirmatively further fair housing per 24 CFR §91.110 and §91.115.](#)

5. Summary of public comments

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

Following the release of the Draft 2017 OYAP, the Public Comment period was open from November 11, 2016, through December 15, 2016, and a public hearing was held on December 6, 2016, in Austin, TX. Public comment was solicited in person at the public hearing, in writing by email, fax, or mail. The State received three total comments from the following 10 organizations: Accessible Housing Austin!, Accessible Housing Resources, Inc., ADAPT of Texas, Coastal Bend Center for Independent Living, Coalition of Texans with Disabilities, Lifeworks, Motivation, Education & Training, Inc., Personal Attendants Coalition of Texas, Texas Association of Community Development Corporations, and the Texas State Independent Living Council. A summary of the comments received and reasoned responses are provided in *Attachment A: Public Comment and Reasoned Responses*.

A revised Draft 2017 OYAP was released for public comment from May 12, 2017, through June 12, 2017. Public comment was solicited in writing by email, fax, or mail. No public comments were received during the second round of public comment.

[An Amended 2017 OYAP will be released for public comment from September 8, 2017, through October 8, 2017. A summary of any comments received and reasoned responses will be provided in Attachment A: Public Comment and Reasoned Responses.](#)

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

A summary of the comments received and reasoned responses are provided in *Attachment A: Public Comment and Reasoned Responses*.

7. Summary

The consolidated planning process occurs once every five years, so creating a comprehensive 2015-2019 Consolidated Plan was vital for CDBG, HOME, ESG, HOPWA, and NHTF. Because of the Consolidated Plan's authority to govern these programs, research from multiple sources, including other government plans, peer-reviewed journals, news sources, and fact sheets were used; valuable public input was gathered through roundtable meetings, council/workgroup meetings, public hearings, online surveys, and an online forum; and an expansive public input process was included in the development of the Consolidated Plan. The 2015-2019 Consolidated Plan is now carried out through Annual Action Plans, which provide a concise summary of the actions, activities, and the specific federal and non-federal resources that the State plans to use each year to address the priority needs and specific goals identified by the Consolidated Plan.

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

1. Introduction

In an effort to gather information from diverse audiences, TDHCA uses different forms of technology to communicate efficiently, including online surveys, forums, social media, and email distribution. Online surveys foster an increased response rate of participants as well as facilitating data analysis, as illustrated in the ESG electronic survey, described below. Also, online forums are used in the development of program rules and distribution methods. Online forums are advertised at workgroups and committees as well as on social media. The availability of all these methods is communicated primarily via the TDHCA website, opt-in email distribution lists, ~~and~~ social media, and through announcement at meetings and conferences.

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

In the consolidated planning process, the State encourages the participation of public and private organizations, including broadband internet service providers, organizations engaged in narrowing the digital divide, agencies whose primary responsibilities include the management of flood prone areas, public land or water resources, and emergency management agencies in the process of developing the consolidated plan.

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

The Texas Legislature has created the Housing and Health Services Coordinating Council which meets not less than quarterly and carries out a variety of coordinating, educational, analytical, and training efforts. This council is chaired by TDHCA's executive director and has representation from a wide array of agencies that provide health related services, as well as developers and advocates in different relevant sectors. It is supported administratively by TDHCA staff.

The State works to enhance coordination between public and assisted housing providers, and private and governmental health, mental health, and service agencies. For example, TDHCA staff routinely attends inter- and intra-agency meetings to educate and coordinate housing and services, as described in the following sections of the 2015-2019 Consolidated Plan: Strategic Plan Section 35, Anticipated Resources, and Action Plan Section 65, Homeless and Other Special Needs. The State is also a subrecipient of Money Follows the Persons funds via the Department of Aging and Disability Services

and of Section 811 funds – in both programs intensive coordination and collaboration is occurring relating to the interplay between health services and housing.

DSHS contracts with seven AAs across the State to provide administrative support in implementing the State's HOPWA formula program. AAs work with HIV Planning Councils in major metropolitan areas and with other organizations and stakeholders outside the major metropolitan areas to develop comprehensive HIV Services plans and needs assessments, which are developed through consultation with clients and other stakeholders through interviews, surveys, focus groups, and/or public hearings. AAs must communicate with stakeholders through disseminating written copies of services plans, posting the plans on the internet, town hall meetings, and advisory groups. Project Sponsors work closely with the local public housing authority offices to identify and establish relationships with other organizations that may have available resources. This ongoing collaboration provides access to organizations and programs, such as the housing choice vouchers; Continuum of Care ("CoC"); community health clinics; churches and private foundations; and Ryan White and HIV Planning Councils.

TDHCA launched its ~~new~~ fair housing email list in July 2014. This email list is for persons and organizations who wish to be updated on fair housing-related TDHCA news, event information, and announcements. Because of the time needed to sign up to the email list, other email lists were used to advertise consultations. However, fair housing organizations received notice of the consultations, as evidenced by their participation in the Online Forum and Single Family Roundtables.

TDA consults with local governments both in person and through web-based meetings. As a part of the traditional CDBG planning process, public hearings were held in each of the 24 Council of Government planning regions. Each Regional Review Committee, composed of local elected officials, discussed local funding priorities for the Community Development Fund and adopted scoring criteria to implement those priorities. Additionally, the Texas Rural Health and Economic Development Advisory Council (TRHED) met on September 16, 2015, and May 25, 2016, to discuss rural policy issues, as well as receive updates and proposed program changes for the state CDBG program.

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

There are two main methods in which TDHCA coordinates its work with other colonia-serving entities. One relates to the Colonia SHC Program which funds specific Texas-border county governments with four-year contracts. Awards and funding associated with this program are reviewed and recommended by a Colonia Resident Advisory Group ("C-RAC"). The other coordination effort relates to a cross-agency effort organized by the Texas Secretary of State that generates structured communications and data collection in conjunction with other state agencies serving colonias with their respective programs. On a very frequent basis—weekly or more often—TDHCA provides guidance and oversight to the county governments with which TDHCA has executed SHC contracts. Somewhat less often, TDHCA provides guidance and technical assistance to the housing subgrantees with whom respective counties have contracted to achieve specific deliverables per their individualized SHC subcontracts. Every one to two

years, TDHCA organizes and implements a workshop for all eligible counties and their subgrantees to review rules and best practices and to exchange other program updates. Periodically, TDHCA convenes a meeting with the C-RAC, which is a group of colonia residents who live in the specific colonias served by the centers. This grass-roots-style committee approves contracts, evaluates county recommendations and provides TDHCA and the counties with guidance on programming and activities in the colonias. Lastly, approximately every two years, TDHCA updates its SHC Program rules, and initiates this process by first soliciting comment from the public at large for critiques of the current rules and suggestions for changes.

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

On a quarterly basis, TDHCA and TDA convene with several other state agencies that directly serve colonia residents in the areas of utilities infrastructure, transportation infrastructure, water/water water, health services, housing, and consumer issues. This group is called the Colonia Interagency Infrastructure Coordination Work Group and is organized by the Texas Office of the Secretary of State's Colonia Initiatives Program. This group has been meeting regularly since approximately 2007 when Texas passed legislation requiring the systematic identification and classification of Texas colonias, and the tracking of colonia-serving state-funded projects. The overarching goal of the workgroup is to stop the proliferation of colonias and improve the health, safety, and quality of life for colonia residents in the Texas-Mexico border region. By classifying colonias based on their level of infrastructure and access to public health services, various state agencies, and the Texas Legislature are able to prioritize funding and target colonias with critical needs (Texas Office of the Secretary of State, 2010). Besides TDHCA and TDA, other agency members of this work group include the Texas Water Development Board ("TWDB"), the Texas Commission on Environmental Quality, the Texas Department of Transportation, HHSC, and the DSHS.

Further, to promote greater supply of rental housing for colonia residents and to enhance the availability of municipal services to colonias, TDHCA has scoring criteria in its Qualified Allocation Plan for properties proposed in colonias.

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

ESG funds are released by Notice of Funding Availability ("NOFA") for an amount of available funding within each Continuum of Care ("CoC") region. Applicants within each CoC region either submit an application for ESG funding directly to TDHCA or to their CoC Lead Agency; if submitted to their CoC Lead, it is the CoC Lead that recommends ESG awards to TDHCA for their region. The CoC and ESG Subrecipients are required to interact on a number of levels. For example, the ESG Subrecipient is required to access the CoC's coordinated access which, per 24 CFR §578 is "designed to coordinate

program participant intake assessment and provision of referrals.” In this way, CoCs and ESG Subrecipients work together to address the needs of persons experiencing or at-risk of homelessness.

In 2016, TDHCA held a roundtable in the Wichita Falls/Wise, Palo Pinto, Wichita, and Archer Counties’ CoC with CoC member agencies and anti-poverty service providers to determine how ESG funding could be used. For 2015 and 2016 ESG application cycles, TDHCA received no applications from this CoC. Specifically for youth, the CoCs member agencies worked for several months in 2015 and 2016 to count and assess the needs of youth experiencing or at-risk of homelessness. Per the 84(R) Texas Legislative Session House Bill 679, TDHCA was required to conduct a count of youth experiencing homelessness. TDHCA contracted with the Texas Network of Youth Services (“TNOYS”) to engage communities to conduct the counts in conjunction with the HUD-required point in time counts or as a stand-alone youth count. As a result of the outreach, the CoC lead agencies or member agencies in 13 Texas communities focused on determining the number of youth experiencing homelessness or housing instability in their communities. The counts resulted in the submission of 1,007 surveys and were part of the statewide initiative called Youth Count Texas! (“YCTX”), conducted from October 2015 to March 2016.

The next phase of YCTX includes the analysis of the data collected by YCTX, along with Texas Education Agency (“TEA”), and Department of Family Protective Services (“DFPS”). TDHCA has contracted with the University of Houston to analyze the data and develop a strategic plan to address youth homelessness, per House Bill 679. As part of the outreach to develop the strategic plan, the University of Houston participated in sessions at the TNOYS conference in August 2016, and at the Texas Conference on Ending Homelessness (“TCEH”) in September 2016. The TCEH has the participation of many CoC member agencies.

Specifically for Veterans, TDHCA is conducting a study on Homelessness among Veterans, which is required per 84(R) Texas Legislative Session Senate Bill 1580. The study includes input received from roundtables at the TCEH in 2015 and at the Texas Veterans Commission Summit in 2016, during which over 100 participants gave recommendations on how to address Veteran homelessness.

In addition, the Texas Interagency Council for the Homeless (“TICH”) meets at least once a year with CoCs. The TICH was created in 1989 by the Texas Legislature to coordinate the State’s homeless resources and services. The TICH created a Youth Workgroup to give input into YCTX and a Veterans Workgroup to provide input into the Study on Homelessness among Veterans. The TICH Youth Workgroup includes DFPS, TEA, Texas Homeless Education Office, Texas Department of Juvenile Justice, and the Texas Health and Human Services Commission. The TICH Veteran Workgroup includes TDHCA, Texas Veteran Commission, Texas Health and Human Services enterprise agencies, Texas State Affordable Housing Corporation, and Texas Homeless Network. The TICH membership as a whole receives regular updates on YCTX and the Study on Homelessness among Veterans.

Describe consultation with the Continuum(s) of Care that serves the State in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects

and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS

In October 2016, TDHCA released a draft 2017 ESG NOFA for public comment. During the public comment period, TDHCA anticipates input from the CoCs and ESG subrecipients on how to allocate ESG funds and prioritize scoring, develop performance standards and evaluate outcomes, and develop funding, policies and procedures for HMIS.

The draft 2017 ESG NOFA may include additional points for domestic violence and legal service providers that work to integrate their programs into the CoCs coordinated access/centralized entry system. Several CoC member agencies have communicated to TDHCA that their coordinated access systems function through HMIS. Because domestic violence and legal service providers are not permitted to use HMIS per 24 CFR §576.400(f), those service providers could be excluded from the coordinated access system without a workaround of the current system. Additional points may be available for the purpose of integrating the domestic violence and legal service providers in coordinated access, with the understanding that information entered into an HMIS-comparable database must not be entered directly into or provided to an HMIS.

TDHCA hosted a roundtable to discuss the possibility of instituting sub-regions in the Balance of State CoC region. The Balance of State CoC is the largest CoC with over 200 counties. Through analysis of the last three years of ESG funding cycles, some areas in west and mid Texas have not received State ESG funding as they are competing against all counties in the BoS region. Currently the Balance of State CoC is the most competitive CoC region for ESG applications, with both the largest number of applicants and the highest-scoring applications. The implementation of regions within the Balance of State may encourage local providers in those areas to apply for ESG funding if the competition was limited to local areas.

TDHCA is working with the CoCs to revise the ESG scoring metrics in conjunction with the CoCs. TDHCA has received feedback that the CoC Program has certain targets for similar activities that are higher than ESG's targets. ESG Subrecipients that are CoC members are getting mixed messages by the HUD CoC Program giving different targets of acceptable percentages of goals reached than TDHCA. TDHCA will reevaluate its ESG Subrecipient performance and compare that performance to HUD's CoC targets to determine scoring criteria for the ESG awards.

Last year, TDHCA released a survey seeking program input from the CoCs. TDHCA plans to host an online forum instead of a survey for the 2017 ESG Program. Notice of the online forum will be sent out via email list announcement.

For 2016 ESG funds, TDHCA identified five CoC Lead Agencies that met specific pre-Application criteria and were used to manage a local competition for 2016 ESG funding: Metro Dallas Homeless Alliance for the Dallas City and County CoC; Tarrant County Homeless Coalition for the Fort Worth/Arlington/Tarrant

County CoC; El Paso Coalition for the Homeless for the El Paso City and County CoC; the City of Amarillo for Amarillo CoC; and Coalition for the Homeless of Houston/Harris County for City of Houston/Harris County CoC. TDHCA plans to release a Request for Applications for 2017 ESG Coordinators, which are lead agencies at the CoC that will run a local competition on behalf of TDHCA for ESG funds. In this way, the CoC lead agencies have authority to recommend allocations for ESG program funds and evaluate outcomes for ESG.

TDHCA consults with CoCs through involvement in the TICH and through participation in the TCEH. The TICH held a quarterly meeting on September 21, 2016, in conjunction with this conference. At the meeting, TDHCA sought public input from the TICH and CoC members on coordinated planning around homelessness issues.

2. Agencies, groups, organizations and others who participated in the process and consultations

Table 1 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	TICH
	Agency/Group/Organization Type	Housing Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Victims of Domestic Violence Services-homeless Services-Health Services-Education Services-Employment Service-Fair Housing Services - Victims Health Agency Child Welfare Agency Other government - Federal Other government - State Other government - County Other government - Local
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Input on the 2017 OYAP will be sought at the January 2017 quarterly meeting of the Texas Interagency Council for the Homeless (TICH). The function of the TICH is to coordinate the state's resources and services to address homelessness. TICH serves as an advisory committee to TDHCA. Representatives from eleven state agencies sit on the council along with members appointed by the governor, lieutenant governor, and speaker of the house of representatives.

2	Agency/Group/Organization	Rural Health and Economic Development Advisory Council
	Agency/Group/Organization Type	Housing Services - Housing Services-Health Other government - State Other government - County Other government - Local Regional organization Planning organization Business and Civic Leaders
	What section of the Plan was addressed by Consultation?	Economic Development Anti-poverty Strategy CDBG Method of Distribution
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Details on the Rural Health and Economic Development Advisory Council fall meeting will be included in the final 2017 OYAP. Consisting of nine members, this council is tasked with identifying rural policy priorities and reviewing the effectiveness of existing rural programs. The council's Rural Policy plan focused on strategic initiatives for economic and community development, improvements to existing rural health care systems and recommendations for the use and allocation of Community Development Block Grant funding, which is used to make improvements in rural communities across Texas.

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

As indicated in the Introduction, during the ongoing consultation and public participation process, Texas seeks input from a wide range of agency types.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Texas Homeless Network	Texas Homeless Network (THN) is a non-profit membership-based organization helping Texas communities prevent and end homelessness. THN provides training and technical assistance around the state of Texas helping service providers and communities better serve the homeless population with the end goal of preventing and ending homelessness.

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Pathways Home	TICH	Pathways Home presents findings which indicate that greater coordination of employment and health service resources with local housing programs would expand the State's capacity to prevent and end episodes of homelessness. In response to the study findings, Pathways Home proposes a framework to help more of the State's most vulnerable citizens to enter and remain in safe housing. A report is generated annually by the TICH that serves as a supplement to Pathways Home.

Table 2 – Other local / regional / federal planning efforts

Narrative

Since the consolidated planning process is an ongoing effort, the State continues to consult with agencies, groups, and organizations through the program year cycles for CDBG, ESG, HOME, NHTF and HOPWA, [and the development of HUD required fair housing documents.](#)

[In the development of HUD required fair housing documents, the State plans to consult with housing agencies administering public housing, Public Housing Authorities \(“PHAs”\), state-based and regionally-based organizations that represent protected class members and organizations that enforce fair housing laws, including agencies that participate in HUD’s Fair Housing Initiatives Program \(“FHIP”\) and HUD’s Fair Housing Assistance Program \(“FHAP”\). Further, the State will make available on TDHCA’s website HUD-provided data and supplemental information which the State intends to incorporate into these documents. At least three public hearings will be held before a HUD required Fair Housing document is published for comment.](#)

[If a material amendment of a HUD required fair housing documents is needed as described in 24 CFR 5.164, reasonable notice by publication on TDHCA’s website will be given, comments will be received for no less than 30 days after notice is given, and a public hearing will be optional, and will be held within the public comment period.](#)

Language needs

[The State conducted an analysis of eligible program participants with Limited English Proficiency \(“LEP”\). The analysis was performed for households at 200% poverty, roughly equivalent to 80% area median income statewide in Texas. The overwhelming need, at 74% of LEP persons, was for Spanish language translation. The state will translate vital documents into Spanish. The state will analyze market areas for program beneficiaries to determine if documents should be translated into additional languages. The state will apply four-factor analysis to consider the resources available and costs considering the frequency with which LEP persons come into contact with the program and the nature and importance of the program, activity, or service. The State will make reasonable efforts to provide language assistance to ensure meaningful access to participation by non-English speaking persons.](#)

AP-12 Participation - 91.115, 91.300(c)

1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting

Encouragement of Public Participation

To reach minorities and non-English speaking residents, the Plan outreach follows [TDHCA's the State's Language Access Plan](#). Also, the notices are available in Spanish and English, per Tex. Gov't Code Chapter 2105. Translators will be made available at public meetings, if requested.

The State encourages the involvement of individuals of low incomes and persons with disabilities in the allocation of funds and planning process through regular meetings, including community-based institutions, consumer workgroups, and councils (many of these meetings are listed in the Strategic Plan Section 35 of the 2015-2019 Consolidated Plan). All public hearing locations are accessible to all who choose to attend. Comments can be submitted either at a public hearing or in writing via mail, fax, or email. Reasonable notice by publication on TDHCA's website at <http://www.tdhca.state.tx.us> will be given, and comments will be received for no less than 30 days after notice is given.

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

Public hearings

~~The Draft 2017 OYAP was released for a 30-day public comment period from November 11, 2016, to December 12, 2016. A public hearing was held in Austin on November 16, 2015. Constituents were encouraged to provide input regarding all programs in writing or at the public hearing.~~

~~The p~~Public hearing schedules ~~was~~are published in the Texas Register and on TDHCA's website at <http://www.tdhca.state.tx.us>, and ~~is~~are advertised by opt-in email distribution and during various workgroups and committee meetings. During the public comment period, printed copies of ~~the~~ draft Plans are available from TDHCA, and electronic copies may be available for download from TDHCA's website. Constituents are encouraged to provide input regarding all programs in writing or at the public hearings. See the Citizen Participation Outreach table below for details of annual outreach.

Criteria for Amendment to the Consolidated Plan

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

Performance Report

The 2017 CAPER will analyze the results of the 2016 OYAP. Due to the short 90-day turnaround time of the end of the State's Program Year (1/31) and the due date of the CAPER, the public will be given reasonable notice by publication on TDHCA's website at <http://www.tdhca.state.tx.us>. Comment will be accepted for a minimum of 15 days. A public hearing will be optional.

One Year Action Plan

The draft One Year Action Plan ("OYAP") is released for public comment prior to HUD's release of actual annual allocation amounts, and the draft OYAP reflects estimated allocation amounts. Once HUD releases actual annual allocation amounts and prior to submission to HUD, proposed activities' budgets will be increased or decreased from the estimated funding levels to match actual allocation amounts, and proposed program goals will be adjusted proportionally or as otherwise described in the 2017 Action Plan.

[Complaints related to the Consolidated planning process follow the TDHCA complaint process, as defined by 10 Texas Administrative Code §1.2.](#)

[For details on the development of or amendments to HUD required Fair Housing document, see the AP-10 Narrative section above.](#)

2. Summary citizen participation process and efforts made to broaden citizen participation in Colonias

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

TDHCA provides guidance, technical assistance and oversight to the units of local government with which TDHCA has executed SHC contracts. Technical assistance includes program administration, guidelines, requirements needed to fulfill contractual requirements in serving colonia residents with CDBG funding. Every one to two years, TDHCA organizes and implements a workshop for all eligible counties and their subgrantees to review rules, best practices, and exchange other program updates. Periodically, TDHCA convenes a meeting with C-RAC. This grass-roots-style committee considers contract proposals, approves contracts, evaluates county recommendations, and provides TDHCA and the

counties guidance on programming and activities in the colonias. Lastly, approximately every two years, TDHCA updates its SHC Program rules, and initiates this process by first soliciting comment from the public at large for critiques of the current rules and suggestions for changes.

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

On a quarterly basis, TDHCA and TDA convene with several other state agencies that directly serve colonia residents in the areas of utilities infrastructure, transportation infrastructure, water/water water, health services, housing, and consumer issues. This group is called the Colonia Interagency Infrastructure Coordination Work Group and is organized by the Texas Office of the Secretary of State's Colonia Initiatives Program. This group has been meeting regularly since approximately 2007 when Texas passed legislation requiring the systematic identification and classification of Texas colonias, and the tracking of colonia-serving state-funded projects. The overarching goal of the workgroup is to stop the proliferation of colonias and improve the health, safety, and quality of life for colonia residents in the Texas-Mexico border region. By classifying colonias based on their level of infrastructure and access to public health services, various state agencies, and the Texas Legislature are able to prioritize funding and target colonias with critical needs (Texas Office of the Secretary of State, 2010). Besides TDHCA and TDA, other agency members of this work group include the Texas Water Development Board ("TWDB"), the Texas Commission on Environmental Quality, the Texas Department of Transportation, HHSC, and DSHS.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
<u>1</u>	<u>Public Meeting – TDHCA Board Meeting</u>	<u>Non-targeted/broad community</u>	<u>The Draft 2017 OYAP was presented at the TDHCA Board meeting of November 10, 2016, and the Board approved its release for public comment.</u>	<u>Public comments are accepted at each meeting of the TDHCA Board in accordance with §2306.032(f) and §2306.066(d) of the Tex. Gov’t Code. No public comments were received for the Draft 2017 OYAP at the TDHCA Board meeting of November 10, 2016.</u>		<u>TDHCA’s board agenda and information is filed with the Texas Office of the Secretary of State (“SOS”) in advance of each meeting, in accordance with the Texas Open Meetings Act. Board materials are posted at http://www.tdhca.state.tx.us/board/meetings.htm.</u>
<u>2</u>	<u>Public Comment Period #1</u>	<u>Non-targeted/broad community</u>	<u>The Draft 2017 OYAP was released for a 30-day public comment period from November 14, 2016, to December 15, 2016.</u>	<u>The State received 3 total comments from 10 organizations. A summary of public comments and reasoned responses are provided in Attachment A.</u>		<u>Texas Register Announcement of public hearing and public comment period: https://www.sos.texas.gov/texreg/archive/November252016/In%20Addition/In%20Addition.html#117</u>

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
<u>14</u>	Public Hearing	Non-targeted/broad community	The State held a public hearing on November 12, 2015 <u>December 6, 2016</u> to receive comments on the <u>Draft 2016</u> OYAP. Three individuals attended and no public comment was provided.	No public comments were received at the public hearing.		http://www.tdhca.state.tx.us/events/index.jsp?eventID=2328
<u>5</u>	<u>Public Meeting – TDHCA Board Meeting</u>	<u>Non-targeted/broad community</u>	<u>A summary of revisions was presented at the TDHCA Board meeting of March 23, 2017.</u>	<u>No public comments were received for proposed revisions to the Draft 2017 OYAP at the TDHCA Board meeting of March 23, 2017.</u>		http://www.tdhca.state.tx.us/board/meetings.htm
<u>6</u>	<u>Public Comment Period #2</u>	<u>Non-targeted/broad community</u>	<u>A Revised Draft 2017 OYAP was released for a 30-day comment period from May 12, 2017, to June 12, 2017.</u>	<u>No public comments were received.</u>		http://www.tdhca.state.tx.us/public-comment.htm

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
<u>7</u>	<u>Public Meeting – TDHCA Board Meeting</u>	<u>Non-targeted/broad community</u>	<u>The Final 2017 OYAP was presented at the TDHCA Board meeting of June 22, 2017.</u>	<u>No public comments were received for the Final 2017 OYAP at the TDHCA Board meeting of June 22, 2017.</u>		http://www.tdhca.state.tx.us/board/meetings.htm
<u>82</u>	Internet Outreach	Non-targeted/broad community	TDHCA has a centralized webpage for public comment on all plans, reports, and program rules.	All public comments and reasoned responses are provided in the Public Comment Attachment.		http://www.tdhca.state.tx.us/public-comment.htm

Table 3 – Citizen Participation Outreach