

*2016 State of Texas*  
*Consolidated Annual Performance and Evaluation Report*  
*Reporting on Program Year 2015*



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## **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.

The information contained in this Consolidated Annual Performance and Evaluation Report (“CAPER” or “Report”) provides an assessment of the State of Texas' progress towards meeting stated goals and objectives stated in the 2015 – 2019 Consolidated Plan and One Year Action Plan goals and objectives for Program Year (“PY”) 2015. The CAPER reports on Program Year 2015 (February 1, 2015, through January 31, 2016) for the following federal formula grant programs:

- Community Development Block Grant (“CDBG”)
- HOME Investment Partnerships Program (“HOME”)
- Housing Opportunities for Persons with AIDS (“HOPWA”), and
- Emergency Solutions Grant (“ESG”)

For the HOME Program, the state is meeting or exceeding annual goals by 14% and has made significant progress toward meeting needs identified in the Needs Assessment. The goals have been met by the timely programming and reprogramming of funds toward areas of demonstrated need and capacity. HOME allocation priorities are first met through a regional dispersion of funds in accordance with Texas Government Code §2306.111 which requires a Regional Allocation Formula (“RAF”) to allocate HOME funding. The 2015 RAF used data from the Census Bureau to prioritize funding according to needs identified in the Consolidated Plan including number of persons who live at or under 200% of the poverty line; number of households with rent or mortgage payments that exceed 30% of income; number of units with more than one person per room; and vacant units for rent or for sale. In addition, local administrators of TDHCA's HOME funds target assistance to special needs populations as identified through the consolidated planning progress such as the elderly, persons with disabilities, colonia residents, farmworkers, homeless populations, veterans, as well as other special needs groups identified in the Consolidated Plan. Although, in most of its activity types, TDHCA’s HOME performance well exceeded expectations. It should be noted that low performance is indicated in HOME in two categories – single family construction and homebuyer assistance with rehabilitation. Single family construction and homebuyer assistance with rehabilitation are lower than projected because of low demand by subrecipients for these activity types.

It should be noted that there were several instances for which IDIS is requesting data for information that is not federally required and which TDHCA does not collect. In such cases those items have been left blank.

For progress made by CDBG, HOPWA, and ESG, see the narrative sections below Table 1.

**Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)**

Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs, and percentage completed for each of the grantee’s program year goals.

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
CDBG Colonia Self-Help Centers	Self-Help Centers	CDBG: \$	Other	Other	72455	6669	9.20%	14491	6669	46.02%
CDBG Colonia Set-Aside	Affordable Housing Non-Housing Community Development	CDBG Colonias Set-aside: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	16740	5869	35.06%	3348	5869	175.30%
CDBG Disaster Relief / Urgent Need	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	661240	89690	13.56%	132248	89690	67.82%

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
CDBG Economic Development	Non-Housing Community Development Economic Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	66610	150815	226.41%	14122	150815	1,067.94%
CDBG Economic Development	Non-Housing Community Development Economic Development	CDBG: \$	Jobs created/retained	Jobs	4000	679	16.98%			
CDBG Other Construction	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1139215	317274	27.85%	227843	317274	139.25%
CDBG Planning / Capacity Building	Non-Housing Community Development	CDBG: \$ / CDBG Colonias Set-aside: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	187695	52469	27.95%			

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
CDBG Planning / Capacity Building	Non-Housing Community Development	CDBG: \$ / CDBG Colonias Set-aside: \$	Other	Other	0	0		37412	52469	140.25%
Construction of single family housing	Affordable Housing Non-Homeless Special Needs	HOME: \$	Homeowner Housing Added	Household Housing Unit	35	7	20.00%			
Homebuyer assistance with possible rehabilitation	Affordable Housing Non-Homeless Special Needs	HOME: \$	Direct Financial Assistance to Homebuyers	Households Assisted	200	20	10.00%	54	20	37.04%
Homeless Goals	Homeless	ESG: \$	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	22850	740	3.24%	4936	740	14.99%
Homeless Goals	Homeless	ESG: \$	Homeless Person Overnight Shelter	Persons Assisted	53555	8217	15.34%	10711	8217	76.72%
Homeless Goals	Homeless	ESG: \$	Homelessness Prevention	Persons Assisted	31240	3890	12.45%	6248	3890	62.26%

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
HOPWA Permanent Housing Placement Assistance	Affordable Housing Non-Homeless Special Needs	HOPWA: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	65	18	27.69%	13	18	138.46%
HOPWA Short-Term Rent, Mortgage, & Utilities Asst	Affordable Housing Non-Homeless Special Needs	HOPWA: \$	Homelessness Prevention	Persons Assisted	2350	386	16.43%	470	386	82.13%
HOPWA Tenant-Based Rental Assistance	Affordable Housing Non-Homeless Special Needs	HOPWA: \$	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	2200	457	20.77%	445	457	102.70%
HOPWA-Funded Supportive Services	Affordable Housing Non-Homeless Special Needs	HOPWA: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	4450	792	17.80%			

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
HOPWA-Funded Supportive Services	Affordable Housing Non-Homeless Special Needs	HOPWA: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0		910	792	87.03%
Households in new/rehabilitated multifamily units	Affordable Housing Non-Homeless Special Needs	HOME: \$	Rental units constructed	Household Housing Unit	300	387	129.00%	70	387	552.86%
Households in new/rehabilitated multifamily units	Affordable Housing Non-Homeless Special Needs	HOME: \$	Rental units rehabilitated	Household Housing Unit	75	136	181.33%	30	136	453.33%
Rehabilitation of single family housing	Affordable Housing Non-Homeless Special Needs	HOME: \$	Homeowner Housing Rehabilitated	Household Housing Unit	330	179	54.24%	58	179	308.62%
Tenant-Based Rental Assistance with HOME funding	Affordable Housing Non-Homeless Special Needs	HOME: \$	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	2550	457	17.92%	363	457	125.90%

**Table 1 - Accomplishments – Program Year & Strategic Plan to Date**





**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.**

Texas CDBG has continued to address community development needs in rural Texas in carrying out the PY 2015 Action Plan. The vast majority of funding is required to be used to benefit low- to moderate-income areas, and the funding is awarded competitively with significant consideration for regional and local priorities, ensuring that the projects most important to communities are successful.

The Colonia Fund is the second largest program administered by Texas CDBG. In 2015, CDBG funded 13 Colonia Fund-Construction (“CFC”) grants, benefiting 2,146 persons. The \$6.3 million awarded address basic human needs, including first-time water and sewer services, and other utility improvements, along with associated local administration costs. Additional colonia funding was awarded for two Colonia Fund-Planning grants, benefitting 3,723 primarily low- to moderate-income persons. The Colonia Economically Distressed Areas Program (“CEDAP”) set-aside partners with the Economically Distressed Areas Program (“EDAP”) through the Texas Water Development Board - a specific state funding source - to connect colonia residents to major water and sewer construction projects. No funds were awarded for CEDAP projects in 2015, as very few projects met the criteria, and those that did used non-HUD funding sources for the house-to-line connections. TDA is exploring opportunities to expand the partnerships available for CEDAP funding.

A rider to the Texas Department of Agriculture (TDA) state appropriation retains 2.5% of the total annual CDBG allocation for the operation of colonia self-help centers in seven border counties, in addition to the 10% federally mandated colonia set-aside. The self-help centers, overseen by TDHCA’s Office of Colonia Initiatives, received two grants in 2015, totaling \$1,700,000 and benefitting 6,669 persons.

**DISASTER RELIEF / URGENT NEED**

The Disaster Relief (“DR”)/ Urgent Need fund provides assistance for recovery from natural disasters and funds projects that resolve threats to the public health and/or safety of local residents in rural areas. During this reporting period, 11 grants were awarded for Disaster Relief/Urgent Need Fund projects. –Grants were awarded to address drought conditions, wildfire, and flood damage, and will benefit almost 90,000 persons. While the DR Fund did not meet the goal of assisting 132,248 persons in 2015, major flood events in May-June 2015 which required many communities to coordinate with FEMA resulted in a number of additional applications for Disaster Relief/Urgent Need funding that remained pending at the end of the program year.

## ECONOMIC DEVELOPMENT

In PY2015, CDBG funded two types of economic development projects, known as the Texas Capital Fund. Sixteen contracts totaling \$10,914,830 were to create and/or retain 679 jobs under the Real Estate and Infrastructure programs, with at least 51% of those jobs being held by low- and moderate-income workers. The estimated average cost per job created or retained through these contracts is \$16,075. An additional \$2,428,530 was awarded to contracts under the Main Street Program and the Downtown Revitalization Program to stimulate economic development in rural Texas downtown areas. The awards far exceed the goal of benefitting just over 14,000 persons – Main Street / Downtown Revitalization awards reported 150,815 beneficiaries as a result of several larger communities performing city-wide projects and the use of available program income to increase the number of awards.

### **CDBG Use of State Funds (cont.)**

CDBG OTHER CONSTRUCTION - INFRASTRUCTURE IMPROVEMENTS The Community Development ("CD") Fund is the largest fund in the CDGB program. Under the CD Fund, grants are awarded on a competitive basis to address public facilities and housing needs such as sewer and water system improvements, street and drainage improvements, and projects designed to bring existing services up to at least state minimum standards. Of the 259 contracts awarded in PY 2015, 162 were funded by the Community Development fund. Of these, over 80% included water and sewer improvement activities to address basic human needs, and another 15% included road improvement activities. A handful of CD awards along with the Community Enhancement Fund, first awarded in 2015, funded community centers, public safety facilities, and similar opportunities. Beneficiaries for these constructions projects exceeded the goals for 2015. PLANNING The Planning and Capacity Building Fund provides assistance to local governments in rural areas, emphasizing planning activities that primarily address problems in the areas of public works and housing assistance. Texas CDBG awarded 18 grants totaling \$689,120 for planning and capacity building projects to benefit 52,469 persons.

### **HOPWA Progress made in carrying out its strategic plan and its action plan.**

In the budget submitted on the 2015 OYAP, DSHS reserved \$87,679 for administrative expenses (less than the 3% grantee administrative allowance of \$88,417) in order to redirect further funds to HOPWA activities. For 2015, AA contracts totaled \$2,859,583 for the project year. Of the \$2,859,583 contractual budget, \$2,613,671.83 was expended (91%). Of the \$2,947,262 total budget, \$2,701,350.83 was expended (92%). For direct housing assistance (TBRA, STRMU, and PHP), \$2,216,350 was budgeted and \$2,057,607.96 was expended (93%). Individually, TBRA was budgeted at \$1,753,952 with \$1,697,642.95 expended (97%); STRMU was budgeted at \$453,593 with \$353,080.01 expended (78%); and PHP

was budgeted at \$8,805 with \$6,885.00 expended (78%). The Supportive Services budget was \$463,593 with \$411,067.41 expended (89%). Because housing case management is sometimes combined with medical case management funded by the Ryan White HIV/AIDS program, a significant amount of housing supportive services are leveraged from the Ryan White program and other funding sources. Please refer to Part 2: Sources of Leveraging and Program Income for detail. Project Sponsors are permitted to use up to 7% of their contract allocation for administrative services, which is cumulatively \$200,171. Project Sponsors budgeted less than the 7% of the contractual allocation (\$179,640) to utilize more funds for direct services and expended \$144,996.46, which is 6% of the \$200,171 total allowable and 81% of the actual budgeted amount. In the 2015 HOPWA program year, DSHS served 457 households with TBRA (102% of the 445 OYAP goal), 386 households with STRMU assistance (82% of the 470 OYAP goal), and 18 households with PHP assistance (138% of the 13 OYAP goal) for a total of 817 unduplicated households. Of the 817 households served, 792 households also received HOPWA-funded Supportive Services (87% of the 910 OYAP goal). All HOPWA clients receive housing supportive services at some level in order to receive assistance, but some supportive services for clients were leveraged with other funding sources and were not counted in this report. Overall, the HOPWA program was very successful in the 2015 program year.

### **HOPWA Use of State Funds**

DSHS's 2015 HOPWA formula grant award was \$2,947,262. In the State's 2015 One Year Action Plan ("OYAP"), DSHS proposed to serve 445 TBRA, 470 STRMU, and 13 PHP households with assistance, and to provide 910 clients with Supportive Services. DSHS utilized an allocation formula based on prior allocations, historical expenditures, performance data, and reported waitlists. Funds were allocated to address the housing needs in areas with greater evidence of unmet need for HOPWA services. During the project year, funds are reallocated between HOPWA activities within HIV Service Delivery Areas ("HSDAs") to meet changing needs. In the 2011 Texas Medical Monitoring Project, the top HIV-related service that participants stated they needed but were unable to obtain were shelter and housing services (DSHS, 2014b). At the end of the 2015 program year, there were 92 clients on TBRA and 5 clients on STRMU waitlists. Of STRMU waitlisted clients, 2 were waiting for rental assistance, 2 for mortgage assistance, and 1 for utility assistance. TBRA and STRMU waitlists decreased from 150 in 2014 to 97 in 2015, a 35% decrease. After gathering feedback from Administrative Agencies ("AAs"), DSHS allocated the Fiscal Year 2015 formula increase (\$24,630) to TBRA to assist in reducing the waitlists in the current project year. The majority of project sponsors (20 of 25) did not have waitlisted households compared to 19 of 26 without waitlists in 2014. Many TBRA clients depend on HOPWA for extended periods of time because they are unable to transition to other affordable and stable housing. This can prevent new TBRA clients from receiving assistance and contribute to extended waitlists. Continued collaboration with AAs and Project Sponsors to reduce and/or eliminate waitlists will again be a priority in 2016.

### **ESG Progress made in carrying out its strategic plan and its action plan.**

For the ESG program, in the 2016 One Year Action Plan, the persons/households expected to be served by each ESG activity has been adjusted because of a change in projection methodology. The 2015 projections were based on funding planned to be spent on each activity. The 2016 projections are based on funding spent per person per activity from previous ESG awards. Rapid re-housing has historically cost almost double the amount per person than homelessness prevention, and almost ten times the amount per person than emergency shelter or street outreach. To account for the amount of funding per person for rapid re-housing, the total projected number of households served by rapid re-housing decreased by approximately 76%. The new methodology, had it been used in projecting an estimate for 2015, would have estimated that, in 2015, approximately 23,000 persons would be served by emergency shelters, 3,800 would be served by homelessness prevention, and 1,100 would be served by rapid re-housing. Using the new methodology resulted in a decrease in the projected number of persons served for homelessness prevention by 39%, and an increase in the projection of emergency shelter by 1.15%. The performance numbers in Table 1 show that the previous methodology needed adjustments. If the change in methodology was used for the 2015 ESG projections, the performance numbers would be more in line with the expected prior year goals for similarly funded years with the exception of emergency shelter. The projection for emergency shelter will still need to be adjusted or an updated performance measure will need to be developed by TDHCA. In previous CAPERs, TDHCA may have reported on day and night shelters, but the new CAPER template by HUD specifies to report for night shelters only. TDHCA does not have one specific performance measure for its ESG Subrecipients for persons that spent the night at a shelter, so bed nights and persons served at a day or night shelter have been correlated. As a result, the number of persons served for night shelter is lower than previous years' emergency shelter reporting. TDHCA will consider adding a performance measure to capture persons who stay overnight at shelters. However, TDHCA stays within the federal limit of spending less than 60% of its funding on emergency shelter or street outreach by requiring each subrecipient to spend less than 60% of its funding on those two activities. In addition, the 2015 ESG Notice of Funding Availability ("NOFA") had a scoring structure that gave more points to applicants that were serving higher numbers of households with rapid re-housing than applicants that were serving lower numbers of households with rapid re-housing. In this way TDHCA reflects that federal priorities on rapid re-housing and homelessness prevention.

## CR-10 - Racial and Ethnic composition of families assisted

Describe the families assisted (including the racial and ethnic status of families assisted).

### 91.520(a)

	CDBG	HOME	HOPWA	ESG
White	325,874	494	909	22,687
Black or African American	38,288	137	438	10,026
Asian	3,083	1	2	201
American Indian or American Native	2,076	2	6	353
Native Hawaiian or Other Pacific Islander	290	1	7	132
<b>Total</b>	<b>369,611</b>	<b>635</b>	<b>1,362</b>	<b>33,399</b>
Hispanic	148,417	250	549	14,437
Not Hispanic	268,295	413	813	19,366

**Table 2 – Table of assistance to racial and ethnic populations by source of funds**

### Narrative

According to the American Community Survey (“ACS”) 2010-2014 estimates, Texas’ population is approximately 75% White, 12% Black/African American, 4% Asian, and 9% other. In addition, the Texas population was approximately 38% Hispanic and approximately 62% non-Hispanic. Also according to 2010-2014 ACS, the number of people in poverty varied dramatically by race and ethnicity. In Texas, Whites had a poverty rate of 16.1%; Blacks or African Americans had a poverty rate of 24.1%; and Asians had a poverty rate of 11.8%. The Hispanic population had a poverty rate of 26.1%.

ESG - ESG served a higher percentage of minorities than reflected in the general Texas population.

HOME - In the table above, Race categories to report "Other" or "Multi Racial" categories are not provided. The HOME families assisted included 28 Other or Multi Racial families for a total of 663 families assisted.

CDBG- In the table above, Race categories to report "Other" or "Multi Racial" categories are not provided. In PY 2015, the CDBG program completed projects serving over 400,000 person. The percentages of beneficiaries identified as Black (9.2%) and Hispanic (35.6%) roughly correspond to the demographics of Texas overall (11.8% and 37.6% respectively). The CDBG persons assisted included 47,101 Other or Multi Racial persons for a total of 416,712 persons assisted.

HOPWA - In the table above, numbers reported include both eligible individuals and beneficiaries (other household members), not the number of households.

## CR-15 - Resources and Investments 91.520(a)

### Identify the resources made available

Source of Funds	Resources Available	Made	Amount Expended During Program Year
CDBG	269,249,015		74,528,716
HOME	109,200,000		43,353,893
HOPWA	11,789,048		2,701,351
ESG	41,195,380		14,771,397

**Table 3 – Resources Made Available**

### Narrative

HOME - The amount expended for HOME is twice the annual allocation received as it reflects reobligated HOME funds, as well as program income.

ESG - The ESG reporting is cumulative of several years of program funds because of the timing of the release of funds by the federal government and because of unexpended balances that are re-released to ESG subrecipients. Every program year (2/1-1/31) reflects two ESG contract periods; the above figure reflects half of 2014 ESG contracts (2/1/2014-9/30/2015) and half of 2015 ESG contracts (10/1/2015-1/31/2016). In addition, funding from previous contracts is included for smaller amounts of unexpended funds from 2011, 2012 and 2013.

CDBG - The CDBG funding above includes the PY 2015 allocation, any remaining funds from the 2014 allocation, deobligated funds, and program income.

### Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
State of Texas	100	100	State Service Area

**Table 4 – Identify the geographic distribution and location of investments**

### Narrative

ESG Addresses Geographic Areas for Assistance

Assistance provided by ESG funds was available made statewide, and funds were regionally allocation based on the 11 HUD-designated CoC areas: Amarillo; Austin/Travis; Bryan/College Station/Brazos Valley; El Paso City and County; Waco/McLennan; Wichita Falls/Wise, Palo Pinto, Wichita, Archer counties; Houston/Harris County; Dallas City and County/Irving; San Antonio/Bexar County; Fort Worth/Arlington/Tarrant County; and the Texas Balance of State. For 2015, TDHCA did not receive applications from the Wichita Falls/Wise, Palo Pinto, Wichita, Archer counties CoC or the Bryan/College Station/Brazos Valley CoC. In February 2016, TDHCA hosted a roundtable in Bryan/College Station to start a dialogue on how ESG may work in that community in hopes of encouraging ESG applications from the area. TDHCA plans to reach out to Wichita Falls/Wise, Palo Pinto, Wichita, Archer counties CoC to determine how ESG can work in that CoC. TDHCA does not provide priorities for allocating investment

geographically to areas of minority concentration as described in Section 91.320(d).

#### HOME Addresses Geographic Areas for Assistance

TDHCA utilizes the RAF to ensure geographic distribution of HOME funds which considers the number of households in poverty, rent burden, overcrowding, and availability of units for rent and for sale. Assistance to minority populations is analyzed annually and a comprehensive statement of activities is reported in its State of Texas Low Income Housing Plan and Annual Report. Part of this document describes the ethnic and racial composition of families and individuals receiving assistance from each housing program.

HOME funds used for multifamily development are typically paired with tax-exempt bond financing and/or Housing Tax Credits ("HTC"). TDHCA rules that govern the HTC Program include incentives for developments utilizing the 9% HTC (competitive HTC) in high opportunity areas which are defined as high-income, low-poverty areas and are not typically minority-concentrated, but the rules also provide incentives to develop in colonias or economically distressed areas. Developments using tax-exempt bond financing and 4% HTC (non-competitive HTC) are more frequently located in qualified census tracts due to federal guidelines that cause these to be more financially viable.

#### HOPWA Addresses Geographic Areas for Assistance

The Texas HOPWA funding allocations are geographically distributed according to the 26 HIV HSDAs. Allocations are based on several factors, including past performance of Project Sponsors and unmet need, with the majority of Texas HOPWA clients (93% in 2013) classified as extremely low and low income. Allocations generally mirror the Ryan White Program allocation formula, which takes into account population of PLWH, HIV incidence, number of PLWH accessing Ryan White services, percent of PLWH eligible for Medicaid and other considerations. The allocations are then adjusted based on unmet need, prior performance and expenditures, geographic-specific data provided by Project Sponsors, and any other relevant factors. Many of these individuals reside in areas of minority concentration and most PLWH are racial and ethnic minorities, so the program allocates funding to meet the needs of PLWH in Texas.

#### CDBG

See below for the CDBG Regional COG Allocation table and narrative.

## Leveraging

**Explain how federal funds leveraged additional resources (private, state and local funds), including a description of how matching requirements were satisfied, as well as how any publicly owned land or property located within the jurisdiction that were used to address the needs identified in the plan.**

### ESG Program Leverages and Provides Match

To meet the ESG match requirement, TDHCA requires Subrecipients to match 100% of their ESG award. A Subrecipient that is unable to match the award may apply to TDHCA for a match waiver of up to \$100,000. However, these requests have been quite rare.

### 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 10 years and this represents potential tax credit equity in the amount of \$610,000,000, depending on equity pricing. 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 develops a Qualified Allocation Plan ("QAP") each year that governs the selection process of eligible developments which provide affordable 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 increased match requirements for single family activities, and incentivized scoring for match in its competitive activities, to more effectively use limited funding.

### CDBG Leverages and Provides Match

Over 80% of Texas CDBG grants include local matching fund commitments for a total of \$167,071,098. 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. \$158.7 million of the matching funds were associated with job creation activities, with \$100 million committed for a single major project.

HOPWA Leverages

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

<b>Fiscal Year Summary – HOME Match</b>	
1. Excess match from prior Federal fiscal year	7,502,547
2. Match contributed during current Federal fiscal year	806,402
3. Total match available for current Federal fiscal year (Line 1 plus Line 2)	8,308,949
4. Match liability for current Federal fiscal year	3,642,405
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	4,666,544

**Table 5 – Fiscal Year Summary - HOME Match Report**

<b>Match Contribution for the Federal Fiscal Year</b>								
<b>Project No. or Other ID</b>	<b>Date of Contribution</b>	<b>Cash (non-Federal sources)</b>	<b>Foregone Taxes, Fees, Charges</b>	<b>Appraised Land/Real Property</b>	<b>Required Infrastructure</b>	<b>Site Preparation, Construction Materials, Donated labor</b>	<b>Bond Financing</b>	<b>Total Match</b>
0000038311	10/30/2014	960	0	0	0	0	0	960
0000038313	10/30/2014	960	0	0	0	0	0	960
0000038461	10/31/2014	960	0	0	0	0	0	960
0000038462	12/05/2014	960	0	0	0	0	0	960
0000038705	12/05/2014	800	0	0	0	0	0	800
0000038706	12/08/2014	960	0	0	0	0	0	960
0000038718	10/21/2014	0	2,588	0	0	7,155	0	9,743
0000038720	10/24/2014	0	0	0	0	2,609	0	2,609
0000038747	12/15/2014	800	0	0	0	0	0	800
0000038759	12/19/2014	800	0	0	0	0	0	800
0000038774	10/30/2014	0	0	34,850	0	0	0	34,850
0000038901	07/30/2015	0	0	0	0	50,000	0	50,000
0000038967	10/21/2014	36,000	0	0	0	0	0	360,000
0000039112	01/30/2015	150,000	0	0	0	0	0	150,000
0000039190	07/16/2015	0	0	0	0	50,000	0	50,000
0000039193	03/10/2015	0	0	0	0	92,500	0	92,500
0000039198	05/26/2015	150,000	0	0	0	0	0	150,000
0000039225	06/12/2015	0	0	0	0	50,000	0	50,000
0000039377	01/21/2015	37,500	0	0	0	0	0	37,500
0000039701	08/25/2015	20,000	0	0	0	0	0	20,000
0000040078	07/10/2015	0	0	0	65,000	0	0	65,000
0000040252	08/17/2015	46,000	0	0	0	0	0	46,000
0000040606	09/08/2015	5,000	0	0	0	0	0	5,000

**Table 6 – Match Contribution for the Federal Fiscal Year**

**HOME MBE/WBE report**

<b>Program Income – Enter the program amounts for the reporting period</b>				
<b>Balance on hand at beginning of reporting period</b>	<b>Amount received during reporting period</b>	<b>Total amount expended during reporting period</b>	<b>Amount expended for TBRA</b>	<b>Balance on hand at end of reporting period</b>
<b>\$</b>	<b>\$</b>	<b>\$</b>	<b>\$</b>	<b>\$</b>
0	7,970,084	7,736,668	0	261,820

**Table 7 – Program Income**

<b>Minority Business Enterprises and Women Business Enterprises – Indicate the number and dollar value of contracts for HOME projects completed during the reporting period</b>						
	Total	Minority Business Enterprises				White Non-Hispanic
		Alaskan Native American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
<b>Contracts</b>						
Dollar Amount	76,236,085	0	0	1,008,208	233,047	74,994,830
Number	187	0	0	11	3	173
<b>Sub-Contracts</b>						
Number	819	0	3	0	71	745
Dollar Amount	24,583,677	0	286,145	0	6,266,801	18,030,731
	Total	Women Business Enterprises	Male			
<b>Contracts</b>						
Dollar Amount	76,236,085	154,925	76,081,160			
Number	187	2	185			
<b>Sub-Contracts</b>						
Number	0	0	0			
Dollar Amount	0	0	0			

**Table 8 – Minority Business and Women Business Enterprises**

<b>Minority Owners of Rental Property – Indicate the number of HOME assisted rental property owners and the total amount of HOME funds in these rental properties assisted</b>						
	Total	Minority Property Owners				White Non-Hispanic
		Alaskan Native American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0	0	0	0	0	0
Dollar Amount	0	0	0	0	0	0

**Table 9 – Minority Owners of Rental Property**

<b>Relocation and Real Property Acquisition – Indicate the number of persons displaced, the cost of relocation payments, the number of parcels acquired, and the cost of acquisition</b>		
Parcels Acquired	0	0

Businesses Displaced	0	0				
Nonprofit Organizations Displaced	0	0				
Households Temporarily Relocated, not Displaced	0	0				
Households Displaced	Total	Minority Property Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0	0	0	0	0	0
Cost	0	0	0	0	0	0

**Table 10 – Relocation and Real Property Acquisition**

Contracts	0
Number	0
Dollar Amount	\$0
Number	12
Dollar Amount	\$4,753,039

**Table 11: Minority Business Enterprises – Other of Mulit Racial**

**Narrative for Minority Owners of Rental Property and Relocation and Real Property Acquisition**

Data for Minority Owners of Rental Property and Relocation and Real Property Acquisition (Tables 9 and 10) are not required under 24 CFR §91.520 and some of these datapoints are not captured in TDHCA records. Zeros indicted above would more accurately be described as Not Available, and do not necessarily mean that no funds were used for that data point. TDHCA is working towards capturing Relocation and Real Property Acquisition data and more detail will be provided in the 2017 One Year Action Plan and the 2017 CAPER.

Region	Number of Grants	Amount Awarded	Beneficiaries
Alamo Area COG	9	\$ 2,475,000	16,642
Ark-Tex COG	6	\$ 1,650,000	8,070
Brazos Valley COG	5	\$ 1,375,000	1,096
Capital Area COG	7	\$ 1,925,000	19,795
Coastal Bend COG	5	\$ 1,700,000	13,233
Central Texas COG	5	\$ 1,375,000	16,174
Concho Valley COG	4	\$ 800,000	2,631
Deep East Texas COG	11	\$ 2,750,000	20,863
East Texas COG	13	\$ 3,299,900	7,030
Golden Crecent RPC	4	\$ 1,100,000	2,123
Houston-Galveston Area	9	\$ 3,144,250	16,090

Heart of Texas COG	5	\$ 1,500,000	13,949
Lower Rio Grande Valley DC	8	\$ 1,846,960	23,113
Middle Rio Grande DC	6	\$ 1,273,595	4,315
North Central Texas COG	18	\$ 5,175,000	41,743
NORTEX COG	4	\$ 1,100,000	3,797
Permian Basin RPC	3	\$ 1,050,000	1,128
Panhandle RPC	7	\$ 1,586,571	4,347
Rio Grande COG	8	\$ 1,591,380	38,729
South East Texas RPC	5	\$ 1,375,000	3,255
South Plains AG	5	\$ 1,375,000	2,693
South Texas DC	4	\$ 1,219,688	4,315
TEXOMA COG	5	\$ 959,045	11,953
West Central Texas COG	6	\$ 1,650,000	13,258

Table 12: CDBG Regional COG Allocation

### **Narrative for CDBG Regional COG Allocation**

#### 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 Community Development Fund directs funding to communities in every region of the state.

The CD Fund assigns a percentage of the annual allocation based on multiple factors found in the Action Plan to each of the 24 Regional Councils of Government ("COG"), ensuring that each region of the state receives a portion of the funds. See the "CDBG Regional COG Allocation" table below for details.

2. The Colonia Fund directs funding to communities within 150 miles of the Texas-Mexico border.

Texas CDBG awarded \$6,424,376 under the Colonia Fund, including the Colonia Self Help Center set-aside established by the state legislature.

For the Colonia Self-Help Centers (SHCs), centers are established along the Texas-Mexico border in Cameron/Willacy, Hidalgo, Starr, Webb, Maverick, Val Verde, and El Paso counties as well as in any other county designated as an economically distressed area. The SHC Program serves approximately 28 colonias in seven border counties, which are comprised of primarily Hispanic households and have concentrations of very low-income households.

3. All remaining funds are distributed through state-wide competitions without geographic priorities.

### **Narrative for Program Income**

Although it appears under the heading for HOME MBE/WBE report as downloaded from IDIS, data for Program Income (Table 7) is not part of the HOME MBE/WBE report. The zero indicted in Table 7 for "Amount Expended on TBRA" would more accurately be described as Not Available, and does not necessarily mean that no funds were used for that activity.



## CR-20 - Affordable Housing 91.520(b)

Evaluation of the jurisdiction's progress in providing affordable housing, including the number and types of families served, the number of extremely low-income, low-income, moderate-income, and middle-income persons served.

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	4,936	3,919
Number of Non-Homeless households to be provided affordable housing units	631	938
Number of Special-Needs households to be provided affordable housing units	1,197	1,036
<b>Total</b>	<b>6,764</b>	<b>5,893</b>

Table 11 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	6,221	5,164
Number of households supported through The Production of New Units	69	394
Number of households supported through Rehab of Existing Units	419	315
Number of households supported through Acquisition of Existing Units	55	20
<b>Total</b>	<b>6,764</b>	<b>5,893</b>

Table 12 – Number of Households Supported

**Discuss the difference between goals and outcomes and problems encountered in meeting these goals.**

ESG - ESG Program allows Subrecipients to provide short- and medium-term rental assistance. Short-term assistance is up to three months of rent, per 24 CFR §576.106(a)(1). Medium-term assistance is for more than three months but not more than 24 months, per 24 CFR §576.106(a)(2). Both rapid re-housing and homelessness prevention help individuals and households who are experiencing homelessness or are at-risk of homelessness quickly regain stability in housing through rental assistance. Only rapid re-housing is included above because homelessness prevention is reported by person and not household. It should also be noted that the outcome numbers for households is lower because the one-year goal was based on old projection methodology from the 2015 One Year Action Plan, which has since been updated in the 2016 One Year Action Plan. The updated methodology resulted in a large percentage decrease in the projected number of households served. More detail about the changes in projection methodology are described in CR-05.



HOME - The one year goals for TDHCA's HOME Program include homebuyer assistance with possible rehabilitation for accessibility, TBRA, homeowner rehabilitation assistance, rehabilitation of multifamily units, and construction of single-family and multifamily units. Goals are being successfully met.

CDBG - Currently, Texas CDBG funds primarily support affordable housing through water and sewer infrastructure for housing. Communities may lack resources to provide adequate water and sewer services to their residents, especially those communities located in rural settings; CDBG funding offers a method to install, upgrade, and/or improve water services. The CDBG funding provides a cost savings for housing when used to install water and sewer yard lines and pay impact and connection fees for qualifying residents. Housing rehabilitation projects are prioritized in several fund categories. CDBG funds also help communities study affordable housing conditions, thus providing data on affordable housing stock and creating planning tools for expanding affordable housing. CDBG awarded funds to provide 448 utility connections in PY 2015, which is not reflected in the chart above. Such connections are essential to obtaining and maintaining decent housing.

HOPWA - DSHS' HOPWA Program provides STRMU, TBRA, PHP, and Supportive Services to assist low-income HIV-positive clients and their families to establish or maintain affordable, stable housing, reduce the risk of homelessness, and improve access to health care and other services. HOPWA serves PLWH who are 80% or less of area median income ("AMI"), but a majority of Texas HOPWA clients are under 30% AMI and lack of affordable housing is an ongoing issue. DSHS estimates that the HOPWA program will assist 923 unduplicated, income-eligible households with housing subsidy assistance.

In the 2015 HOPWA program year, DSHS served 457 households with TBRA (102% of the 445 OYAP goal), 386 households with STRMU assistance (82% of the 470 OYAP goal), and 18 households with PHP assistance (138% of the 13 OYAP goal) for a total of 817 unduplicated households. Of the 817 households served, 792 households also received HOPWA-funded Supportive Services (87% of the 910 OYAP goal). All HOPWA clients receive housing supportive services at some level in order to receive assistance, but some supportive services for clients were leveraged with other funding sources and were not counted in this report. Project Sponsors reported less need for STRMU than was originally projected so they prioritized TBRA services instead. Overall, the HOPWA program was very successful in the 2015 program year.

**Discuss how these outcomes will impact future annual action plans.**

ESG - TDHCA is considering lengthening its award period in order to allow ESG Subrecipients to offer a longer period of medium-term rental assistance. TDHCA plans to reach out in 2016 and 2017 to homeless service providers, anti-poverty program providers, and stakeholders about the possible change in the award period. The possible change would affect the 2017 ESG award cycle.

HOME - Since HOME is meeting and exceeding goals and objectives, the outcomes above will not impact future annual action plans.

CDBG - Support of housing through utility access yardlines is a core function of TxCDBG that is still needed in many communities. As the issue of colonias and similar communities is multi-faceted, many local obstacles prevent the state from achieving the ultimate goal of providing clean drinking water and affordable housing to all.

HOPWA - There are no changes planned for the HOPWA program.

**Include the number of extremely low-income, low-income, and moderate-income persons served by each activity where information on income by family size is required to determine the eligibility of the activity.**

<b>Number of Persons Served</b>	<b>CDBG Actual</b>	<b>HOME Actual</b>
Extremely Low-income	0	571
Low-income	0	410
Moderate-income	0	259
<b>Total</b>	<b>0</b>	<b>1,240</b>

**Table 13 – Number of Persons Served**

**Narrative Information**

CDBG - TDA received no applications for housing rehabilitation other than utility access yardlines in Program Year 2015.

## **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**

TDHCA addressed the requirements in 24 CFR §91.320 by using funds to reduce and end homelessness. Organizations that applied for ESG assistance received points in the scoring process if they coordinated with the lead agency of the CoC, which provides services and follows a centralized or coordinated assessment process. Each ESG Subrecipient is required to have written policies and procedures in place as described by §578.7(a)(8) and (9); and follows a written standard to provide street outreach, emergency shelter, rapid re-housing, and homelessness prevention assistance. For 2014 ESG contracts, 16 out of 27 ESG Subrecipients offered street outreach. For 2015, 14 of 26 Subrecipients offered street outreach. Street outreach includes case management, emergency health services, emergency mental health services, transportation, and services for special populations. Special populations include homeless youth, victim services, and services for people living with HIV/AIDS.

### **Addressing the emergency shelter and transitional housing needs of homeless persons**

For 2014 ESG contracts, 26 out of 27 ESG Subrecipients offered emergency shelter. For 2015, 22 of 26 Subrecipients offered emergency shelter. The ESG program helps the unsheltered homeless and homeless individuals and families residing in emergency shelter and those fleeing domestic violence to return to stable housing conditions by providing support to organizations that provide emergency services, shelter, and transitional housing to homeless persons and households. If an ESG Subrecipient offers emergency shelter, that Subrecipient may set a target for how many individuals and families move out of emergency shelter and transitional housing and into permanent housing, achieve higher incomes and gain more non-cash benefits. To ensure long-term housing stability, clients will be required to meet with a case manager not less than once per month (with exceptions pursuant to the VAWA and the FVPSA). Subrecipients will also be required to develop a plan to assist program participants to retain permanent housing after the ESG assistance ends.

**Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: likely to become homeless after being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); and, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs**

ESG Subrecipients are encouraged to work in tandem with other programs that help to transition persons out of institutions, such as the HOPWA Program, Section 811 PRA Program, Project Access Program, Money Follows the Person Program, and the Home and Community-Based Services - Adult

Mental Health Program. The Housing and Health Services Coordination Council ("HHSCC") also works to enhance coordination between housing and service agencies to assist persons transitioning from institutions into community-based settings.

Individuals eligible for the State's HOPWA Program who are exiting from an institution receive a comprehensive housing plan and linkage and referrals to health professionals from a case manager. The State HOPWA Program provides TBRA, which can be used to transition persons from institutions into stable housing. Some project sponsors also provide rental deposits and application fees. Other programs included in this Plan also address persons transitioning from institutions. For example, TDHCA has received two awards totaling \$24 million for the Section 811 PRA Program. The program will help extremely low-income individuals with disabilities and their families by providing approximately 550 new integrated supportive housing units in eight metropolitan statistical areas in the state. Members of the target population include individuals transitioning out of institutions; people with severe mental illness; and youth with disabilities transitioning out of the state's foster care system. Individuals in the Section 811 PRA Target Population are eligible for assistance from public agencies, are Medicaid-eligible, and could be at-risk of housing instability and/or homelessness. Coordination between housing and the Health and Human Services ("HHS") agencies is exemplified by the Project Access and Money Follows the Person programs. Project Access uses Section 8 Housing Choice Vouchers administered by TDHCA to assist low-income persons with disabilities transition from nursing homes and Intermediate Care Facilities ("ICFs") to the community, while using the Money Follows the Person Program to provide services from HHS agencies. Since it began in 2002 the TDHCA Governing Board has continued to make changes to Project Access responsive to input from advocates, such as incremental increases in the number of vouchers from 35 vouchers initially up to 140, and the creation of a pilot program with DSHS for persons with disabilities transitioning out of State Psychiatric Hospitals.

In addition, TDHCA offers the use of HOME Tenant Based Rental Assistance ("TBRA") to individuals on the Project Access Wait List, allowing a client to live in the community until a Project Access voucher becomes available. TDHCA conducted outreach and technical assistance to Department of Aging and Disability Services ("DADS") Relocation Specialists and HOME TBRA Administrators to help them serve individuals on the Project Access waiting list.

To further address the needs of individuals transitioning from institutions, HHSCC, codified in Texas Government Code, Chapter 2306, Subchapter NN, seeks to increase coordination of housing and health services, by supporting agencies to pursue funding, such as Relocation Contractor services for people with behavioral health challenges and Intellectual and Developmental Disabilities; Medicaid waiver programs; vouchers from PHAs for people with disabilities and aging Texans; housing resources from the Texas Department of Criminal Justice for people with criminal histories transitioning to the community; and DSHS' rental assistance program.

HHSCC also encourages the coordination of TDHCA with DSHS for DSHS' new Home and Community-Based Services: Adult Mental Health Program. This program will serve individuals with Serious Mental Illness who have long-term or multiple stays in the State's Mental Health Facilities.

**Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again**

For 2014 ESG contracts, 23 out of 27 ESG Subrecipients offered homelessness prevention. For 2015, 18 of 26 Subrecipients offered homelessness prevention and 22 of 26 Subrecipients offered rapid re-housing. ESG funds can be used for short-term and medium-term rental assistance, rental application fees, security deposits, utility deposits, utility payments, and moving costs for homeless individuals or persons at risk of homelessness. Funds can also be used for housing service costs related to housing search and placement, housing stability case management, mediation, legal services, and credit repair. ESG funds can also be used to pay for essential service costs including case management, child care, education services, employment assistance and job training, outpatient health services, legal services, life skills training, mental health services, substance abuse treatment services, transportation, and costs related to serving special populations.

## **CR-30 - Public Housing 91.220(h); 91.320(j)**

### **Actions taken to address the needs of public housing**

The future success of Public Housing Authorities ("PHAs") will center on ingenuity in program design, emphasis on resident participation towards economic self-sufficiency, and partnerships with other organizations to address the needs of this population. With the exception of TDHCA who is itself a small public housing authority with jurisdiction in limited areas, the departments do not have any direct or indirect jurisdiction over the management or operations of PHAs. However, it is important to maintain relationships with these service providers.

#### HOME and ESG Address the Needs of Public Housing

TDHCA publishes all Notices of Funding Availability on its website and sends notification of funding availability statewide through TDHCA's email subscriber lists. As PHAs have received homebuyer assistance and tenant-based rental assistance funds, information is provided to enable them to transition families toward homeownership or provide additional households with rental assistance and services to increase self-sufficiency.

In some cases, PHA residents may be eligible to receive assistance and services from ESG grantees.

#### CDBG Addresses the Needs of Public Housing

Texas CDBG funds primarily support affordable housing through public infrastructure in low-to moderate-income areas. Texas CDBG may serve public housing areas through various funding categories as residents of PHAs qualify as low- to moderate-income beneficiaries for CDBG projects.

### **Actions taken to encourage public housing residents to become more involved in management and participate in homeownership**

HOME, ESG, HOPWA, and CDBG are subject to 24 CFR Part 135 which requires that HUD funds invested in housing and community development construction contribute to employment opportunities for low-income persons living in or near the HUD-funded project. These requirements, called Section 3 requirements, are covered at trainings for Subrecipients; persons who may benefit from employment opportunities include PHA residents.

#### HOME Addresses Public Housing Resident Initiatives

PHAs are eligible to apply to administer HOME funds to provide homebuyer assistance in their areas. PHAs also provide services to increase self-sufficiency, which may include homebuyer counseling services. In addition, TDHCA recently launched two free homebuyer education online courses. One offers a comprehensive pre- and post-purchase tutorial; the other is an introduction to the Texas Mortgage Credit Certificate ("TX MCC") Program. This initiative expands the availability of homebuyer

education training opportunities and self-sufficiency tools for PHA residents.

#### CDBG Addresses Public Housing Resident Initiatives

All CDBG projects that are subject to Section 3 requirements must document their accomplishments. However, it is very difficult for projects in rural areas to meet the Section 3 definition, as most CDBG-funded projects are constructed with existing construction crews and do not generate new hiring opportunities. Contracting opportunities are advertised locally and available to public housing residents and others through a competitive bidding process.

#### **Actions taken to provide assistance to troubled PHAs**

TDHCA has worked to promote programs that will rehabilitate and bring substandard housing into compliant condition and will develop additional affordable housing units. For example, most of the PHA applications for HTCs are for rehabilitation and the applications for new construction usually include a demolition of the existing units. TDHCA also offers a variety of funding sources for assistance. Most PHAs that apply are usually from larger Metropolitan Statistical Areas, which are Participating Jurisdictions ("PJs") and are generally not eligible to receive HOME funding through TDHCA. Consistent with fair housing objectives, TDHCA seeks ways to accomplish these activities in a manner that seeks to place PHA units in areas of greater opportunity and align with fair housing. Developments must disclose and address undesirable site or neighborhood characteristics.

In its role as a small public housing authority, TDHCA at HUD's request has absorbed vouchers from two PHAs which were having difficulties: the Navasota Housing Authority and the Alamo Area Council of Governments. HUD identified that the Navasota Housing Authority was administering vouchers outside of their jurisdiction, and in the case of Alamo Area Council of Governments they were struggling to administer their voucher program. Therefore, each of these housing authorities contacted TDHCA to discuss the possibilities of absorbing these vouchers with HUD's support. During a series of meetings with HUD staff and the PHAs, discussion resulted in on-site visits, file reviews and ultimately TDHCA Board action to proceed. Both housing authorities transferred their voucher authority and associated tenants and tenant files to TDHCA.

To expand its work with PHAs, TDHCA has developed a relationship with the Texas Housing Association and the Texas chapter of the National Association of Housing and Redevelopment Officials ("NAHRO"), which serve the PHAs of Texas. Whenever possible, the State will communicate to PHAs the importance of serving special needs populations.

## **CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j)**

**Actions taken to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment. 91.220 (j); 91.320 (i)**

The agencies have identified various obstacles that may affect the ability to meet underserved needs in Texas. They include the lack of affordable housing, lack of organizational capacity, lack of organizational outreach, local opposition to affordable housing, regulatory barriers to affordable housing, and area income characteristics (particularly in rural areas). The agencies take actions to mitigate these obstacles such as effectively using existing resources to administer programs, providing information resources to individuals and local areas, and coordinating resources.

### **Actions taken to address obstacles to meeting underserved needs. 91.220(k); 91.320(j)**

#### HOME

The HOME Program provides grant funds, deferred forgivable loans, and repayable loans through units of local government, nonprofit and for-profit organizations, CHDOs, Councils of Governments (“COGs”), and PHAs. These funds are primarily used to foster and maintain affordable housing by providing rental assistance, rehabilitation, or reconstruction of owner-occupied housing units, down payment and closing cost assistance for the acquisition of affordable single family housing, and funding for rental housing development or preservation of existing affordable or subsidized rental housing. HOME funds may also be used in conjunction with the Housing Tax Credit Program to construct or rehabilitate affordable multifamily housing.

#### ESG

TDHCA encourages the use of ESG funds to provide homeless prevention and rapid re-housing assistance, and a shift has taken place in the last several years from emergency shelter to rapid re-housing and homelessness prevention. Since 2013, approximately 34% of program funds have been spent on emergency shelter and 53% of program funds have been spent on homelessness prevention and rapid re-housing. The homelessness prevention and rapid re-housing funds can work to reduce the capacity needed by the emergency shelters, allowing individuals and families at-risk of homelessness to better integrate with the community.

#### CDBG

Texas CDBG encourages affordable housing projects using several methods in the allocation of CDBG funds to eligible communities that can participate in its programs, including favorable state scoring and regional prerogative to prioritize funding for housing infrastructure and rehabilitation. Each region is encouraged to set aside a percentage of the regional allocation for housing improvement projects, and housing applications are scored as high priority projects at the state level.

Currently, the primary method of promoting and supporting affordable housing under the CDGB



program is by providing water and wastewater infrastructure for residential housing. The CDBG funding provides a cost savings for housing when CDBG funds are used to provide first-time water and wastewater services by installing water and sewer house-to-line connections and paying impact and connection fees for qualifying residents.

CDBG funding also helps cities and counties study affordable housing conditions. The plans produced through CDBG planning contracts provide both valuable data concerning a city's or county's affordable housing stock and planning tools for expanding their affordable housing.

The most commonly cited obstacle to meeting the underserved community development needs of Texas cities (aside from inadequate funding) is the limited administrative capacity of the small rural towns and counties the CDBG Program serves. Rural areas may also have difficulty finding interested contractors who have the financial stability and flexibility to complete these projects. Contractors can earn more working in metropolitan areas with larger projects and without the location costs required to transport materials and equipment to rural communities. Texas CDBG staff offers technical assistance to communities and works with regulatory agencies as appropriate to resolve issues and promote successful CDBG projects.

The physical size and the diversity of the State of Texas can present challenges to understanding and meeting underserved needs in local communities. The TDA Field Offices have been established to better serve these communities by providing technical assistance across eleven regions. In addition, the Colonia Self-Help Centers continue to address affordable housing needs in border counties by assisting qualifying colonia residents to finance, refinance, construct, improve or maintain a safe, suitable home in suitable areas.

**Actions taken to reduce lead-based paint hazards. 91.220(k); 91.320(j)**

[This question is duplicated in IDIS. Using this space to respond to "Actions taken to reduce lead-based paint hazards. 91.220(k); 91.320(j)," which is now missing from IDIS.]

**ESG**

For ESG, TDHCA requires Subrecipients to evaluate and reduce lead-based paint hazards for conversion, renovation, or rehabilitation projects funded with ESG funds, and tracks work in these efforts as required by the Lead-Based Paint Poisoning Prevention Act's implementing regulations at 24 CFR Part 35. During the annual contract implementation training, TDHCA provides ESG Subrecipients with federal and state requirements and information related to lead-based paint regulations. TDHCA requires that ESG funded Subrecipients determine if a housing unit was built prior to 1978, for households seeking ESG funded rent or rent deposit assistance whose household has a family member(s) six years of age or younger. If the housing unit is built prior to 1978, the ESG Subrecipient will notify the household of the hazards of lead-based paint.

ESG Subrecipients using ESG funds for renovation, rehabilitation or conversion must comply with the Lead Based Paint Poisoning Prevention Act (42 USC, Chapter 63, §4831) and the Residential Lead-Based Paint Hazard Reduction Act of 1992 (42 USC, Chapter 63, §4852). Through renovation, rehabilitation or conversion, ESG increases access to shelter without lead-based paint hazards. In addition, ESG Subrecipients are required to complete a lead-based paint visual assessment inspection if a unit was constructed before 1978 and a child under the age of six will be living in the unit. This inspection, which makes sure all deteriorated paint has been stabilized, reduces lead-based paint hazards to clients receiving ESG rapid re-housing or homelessness prevention.

### **CDBG**

In accordance with CDBG state regulations and the Lead-Based Paint Poisoning Prevention Act, CDBG has adopted a policy to eliminate as far as practicable the hazards of lead poisoning due to the presence of lead-based paint in any existing housing assisted under the CDBG program. Federal policy prohibits the use of lead-based paint in residential structures constructed or rehabilitated with federal assistance. Abatement procedures should be included in the housing rehabilitation contract guidelines for each project and must appear in the approved work write-up documentation for all homes built prior to 1978 that will be rehabilitated, as outlined in the CDBG Project Implementation Manual.

### **HOPWA**

HOPWA assisted units, including shared housing arrangements, must be safe, sanitary, and compliant with all state and local housing codes, licensing requirements, or other local requirements. In addition, housing must meet all Housing Quality Standards as well as Lead-Based Paint and Fire Safety requirements to be approved.

### **HOME**

The HOME Program increases the awareness of the hazards of lead-based paint by requiring screening for TBRA, homebuyer assistance and homeowner rehabilitation. Furthermore, single-family and multifamily development activities in HOME increase the access to lead-based-paint-free housing because they create new housing. The HOME Program requires lead screening in housing built before 1978 for all HOME-eligible activities. Rehabilitation activities fall into three categories: 1) Requirements for federal assistance up to and including \$5,000 per unit; 2) Requirements for federal assistance from \$5,000 per unit up to and including \$25,000 per unit; and 3) Requirements for federal assistance over \$25,000 per unit. Requirements for federal assistance up to and including \$5,000 per unit are: distribution of the pamphlet 'Protect Your Family from Lead in Your Home' is required prior to renovation activities; notification within 15 days of lead hazard evaluation, reduction, and clearance must be provided; receipts for notification must be maintained in the administrator file; paint testing must be conducted to identify lead based paint on painted surfaces that will be disturbed or replaced or administrators may assume that lead based paint exist; administrators must repair all painted surfaces that will be disturbed during rehabilitation; if lead based paint is assumed or detected, safe work practices must be followed; and clearance is required only for the work area. Requirements for federal assistance from \$5,000 per unit up to and including \$25,000 per unit include all the requirements for federal assistance up to and including \$5,000 per unit and also the following: a risk assessment must be

conducted prior to rehabilitation to identify hazards in assisted units, in common areas that serve those units and exterior surfaces or administrators can assume lead based paint exist; and clearance is required for the completed unit, common areas which serve the units, and exterior surfaces where the hazard reduction took place. Requirements for federal assistance over \$25,000 per unit included all the requirements for federal assistance from \$5,000 per unit up to and including \$25,000 per unit and the following: if during the required evaluations lead-based paint hazards are detected on interior surfaces of assisted units, on the common areas that serve those units or on exterior surfaces including soils, then abatement must be completed to permanently remove those hazards; and if lead based paint is detected during the risk assessment on exterior surfaces that are not disturbed by rehabilitation then interim controls may be completed instead of abatement.

### **Actions taken to reduce the number of poverty-level families. 91.220(k); 91.320(j)**

According to the American Community Survey for 2010 to 2014, Texas had a poverty rate of 17.7% during this time period compared to the national poverty rate of 15.6%. The federal government defined the poverty threshold in 2016 is \$24,300 for a family of four. Many of these poverty-level households can have worst-case housing needs such as severe cost burden, substandard housing and involuntary displacement. Poverty can be self-perpetuating, creating barriers to education, employment, health, and financial stability.

TDA, TDHCA, and DSHS each have an important role in addressing Texas poverty. These agencies seek to reduce the number of Texans living in poverty, thereby providing a better future for all Texans. This means trying to provide long-term solutions to the problems facing people in poverty and targeting resources to those with the greatest need.

### **HOME**

Through the HOME TBRA, TDHCA assists households with rental subsidy and security and utility deposit assistance for an initial period not to exceed 24 months. As a condition to receiving rental assistance, households must participate in a self-sufficiency program, which can include job training, General Education Development (“GED”) classes, or drug dependency classes. The HOME Program enables households to receive rental assistance while participating in programs that will enable them to improve employment options and increase their economic independence and self-sufficiency. Rental assistance may be extended beyond the 24-month period subject to TDHCA’s program rules and based on availability of funds.

### **ESG**

The ESG Program funds activities that provide shelter, essential services, and rapid re-housing for homeless persons, as well as intervention services for persons threatened with homelessness. Essential services for homeless persons include medical and psychological counseling, employment counseling, substance abuse treatment, transportation, and other services. Rapid re-housing services for homeless persons include short and medium-term rental assistance, application fees, security deposits, utility deposits and payments, and moving costs. For 2014 ESG, the State committed \$2,412,856 for shelter

and \$2,768,394 for rapid re-housing activities. In 2015 ESG, the State committed \$2,843,153 for shelter and \$3,031,779 for rapid re-housing. These services are intended to help homeless individuals and those with poverty-level incomes improve their conditions and achieve self-sufficiency.

For individuals facing homelessness, homelessness prevention funds can be used for short-term subsidies to defray rent and utility arrearages for households receiving late notices, security deposits, and payments to prevent foreclosure. In 2014 ESG, the State committed \$1,440,304 for homelessness prevention activities. In 2015 ESG, the State committed \$1,201,401 for homelessness prevention activities. These services are intended to assist very low income households and those with poverty-level incomes in avoiding becoming homeless. (Note that the figures in this section do not correlate to the numbers reported on performance earlier as these figures cross multiple CAPER periods.)

#### HOPWA

DSHS HOPWA Program Administrative Agencies and Project Sponsors are required to take the HOPWA Getting to Work Training Curriculum. The Getting to Work Training Curriculum assists service providers in understanding HIV/AIDS in the context of employment and the different approaches to helping clients who are ready to work identify and achieve their related goals. Employment and vocational services are not authorized activities of the DSHS HOPWA Program. However, a household's individualized housing plan under Supportive Services – specifically, housing case management – could include goals and tasks related to increasing household income.

#### CDBG

A substantial majority of Texas CDBG funds, nearly 95%, are obligated to cities and counties under the funding competitions meeting the national objective to "principally benefit low and moderate income persons." Texas CDBG encourages the funding of communities with a high percentage of persons in poverty through its application scoring. The CDBG projects funded under this national objective are required to serve at least 51% low to moderate income persons. In addition, the CDBG allocation formula used to distribute Community Development funds among regions includes a variable for poverty in the community distress scoring. The percentage of persons in poverty for each region is factored into the allocation formula in order to target funding toward communities with the greatest need. In PY 2015, CDBG awarded 214 contracts under the National Objective of benefiting primarily low to moderate income persons. The \$70,467,635 in funds obligated for this National Objective benefits 503,017 persons, of whom 298,714 are low- to moderate-income persons. The CDBG economic development funds are instrumental in creating infrastructure and jobs. By creating and retaining jobs through assistance to businesses and then providing lower income people access to these jobs, CDBG can be a very effective anti-poverty tool. Providing jobs that offer workplace training and education, fringe benefits, opportunities for promotion, and services such as child care can further maximize the potential benefits. In addition, programs that improve infrastructure affords the opportunity to upgrade existing substandard housing (such as in the colonias) and build new affordable housing where none could exist before. In accordance with 24 CFR §135.1, known as Section 3 of the Housing and Urban Development Act of 1968, as amended, Grant Recipients using CDBG funding for housing or other public construction are required, to the greatest extent feasible, to provide training and employment

opportunities to lower income residents and contracting opportunities to businesses in the project area when those opportunities are triggered by HUD funding. CDBG provides Technical Assistance and program guidance on methods to be employed toward Section 3 goals. Although attaining Section 3 goals is very difficult in rural communities, CDBG closely monitors the results of the communities efforts.

### **Actions taken to develop institutional structure. 91.220(k); 91.320(j)**

#### **HOME**

The HOME Program encourages partnerships in order to improve the provision of affordable housing. Organizations receiving HBA funds are required to provide homebuyer education classes to households directly, or coordinate with a local organization that will provide the education. In addition, organizations receiving TBRA funds must provide self-sufficiency services directly, or coordinate with a local organization that will provide the services. HOME staff also participates in workgroups with representatives from many organizations. The workgroups focus on rural housing, disability, and health related issues around the state.

#### **CDBG**

CDBG funds are awarded to non-entitlement units of general local government thereby providing these communities with financial resources to respond to its community development needs. Such may include planning; constructing community facilities, infrastructure, and housing; and implementing economic development initiatives. Each applicant to the CDBG Program is required through its citizen participation process to inform local housing organizations of its intention to apply for CDBG funding through the Texas CDBG and invite their input into the project selection process. Texas CDBG continues to coordinate with the Texas Department of Housing and Community Affairs, the Texas Water Development Board, the Secretary of State's Colonia workgroup, the Governor's Economic Development Matrix workgroup, the Texas Water Infrastructure Coordinating Committee, and the 24 Regional Councils of Governments to further its mission and target beneficiaries of CDBG funds through programs such as the Colonia Self-Help Centers, the Colonia Economically Distressed Areas Program, the Housing Tax Credit Program, and the Texas Capital Fund.

#### **HOPWA**

DSHS contracts with Administrative Agencies ("AAs") in seven Ryan White Part B HIV Planning Areas encompassing 26 HIV Service Delivery Areas ("HSDAs"). AAs act as an administrative arm for DSHS, with DSHS oversight. AAs subcontract with Project Sponsors in each HSDA for statewide service delivery. These services are integrated with the larger Ryan White HIV/AIDS Program both in administration and service delivery, which in turn is integrated into the larger, multi-sectoral system for delivering treatment and care to these clients. This structure ensures the coordination of all agencies serving PLWH, avoids duplication, saves dollars, and provides the comprehensive supportive services for PLWH in each local community.

#### **ESG**

TDHCA encourages all ESG subrecipients to develop partnerships with service providers in their area, which can develop into collaborative applications. Collaborative applications have a lead agency, which contracts with TDHCA for ESG funding and reporting, and partner agencies, which receive funding through and report to the lead agency. In addition, ESG subrecipients are required to participate in the local HMIS with exceptions for victim and legal services providers. In order to localize the distribution of ESG funds, TDHCA ran pilot programs in which CoC lead agencies managed a local competition of ESG funds in their CoC regions. The pilot occurred in Fort Worth/Arlington/Tarrant County CoC with the Tarrant County Homeless Coalition ("TCHC") and in Houston/Harris County CoC with the Coalition for the Homeless of Houston/Harris County ("CFTH"). TCHC ran a local competition in 2014 and 2015 and CFTH ran a local competition in 2015 on behalf of TDHCA to award TDHCA's ESG funding. The local competitions included:- designing the local NOFA and application; - receiving and reviewing local ESG applications;- coordinating budgets for all ESG applicants; and - making objective decisions during the award process of ESG funds. TCHC reported that the greatest value of its 2014 local competition was greater CoC consultation with the State on local issues. For CoCs not running a local competition, TDHCA asks the CoCs to complete a certification which relays how involved ESG Subrecipients are in the CoC processes. When CoCs establish a local competition, working relationships between the CoCs and the State are created and foster communication. TCHC met several goals during its local competition of ESG funding. First, TCHC addressed needs that were not being met through CoC funding or local ESG grantees (i.e., the City of Arlington, the City of Fort Worth, and Tarrant County). In 2014, TCHC started the process of ESG Consultations to make sure State and local ESG Subrecipients used standard forms to implement coordinated assessment. The ESG Consultations also included making sure the ESG grantees did not provide multiple awards for one activity. Specifically, TCHC knew more awards needed to be made for street outreach and rapid re-housing. The local competition allowed TCHC to achieve a broader distribution of funding for activities in both 2014 and 2015. Second, TCHC established meaningful collaborations and broader participation. Not only did TCHC manage a local competition, but the TCHC also managed the ESG contracts of its awardees. Because TCHC managed the contracts, TDHCA eliminated the minimum amounts specified by TDHCA's NOFA. TCHC reported that bundling services into one contract created efficiency in contract management, but did not always create efficient provision of services. TCHC required that its applicants show their collaborations through memorandums of understanding or letters of support, but the collaborations did not have to be formalized by a shared budget. In addition, TCHC eliminated the points awarded for organizations that had previously administered ESG funding, allowing organizations that had not been funded by ESG to receive an ESG award. TDHCA found that TCHC contract management had advantages, such as freedom to award contracts in smaller amounts than the TDHCA minimum contract amounts, and also disadvantages, such as TCHCA's learning curve to monitor progress on the contracts. These two pilots provided very valuable information to TDHCA in program design. Due to the administrative costs and learning curve associated with managing contracts at the local level, TDHCA is not planning at this time to award CoCs directly, but a CoC may be funded as part of a collaborative application.

**Actions taken to enhance coordination between public and private housing and social service agencies. 91.220(k); 91.320(j)**

Given that Texas is the second largest state, TDA, TDHCA, and DSHS support the formation of partnerships in the provision of housing, housing-related, and community development endeavors to reach more people than one entity could do alone. Partnerships can help expand the geographic area that services reach, as well as leverage and layer funding to address the finite amount of financial resources available for affordable housing, community service, and community development.

TDA, TDHCA, and DSHS are primarily pass-through funding agencies and distribute federal funds to local entities that in turn provide assistance to households. Because of this, the agencies work with many housing and community development partners, including consumer groups, community-based organizations, neighborhood associations, community development corporations, councils of governments, community housing development organizations, community action agencies, real estate developers, social service providers, local lenders, investor-owned electric utilities, local government, nonprofits, faith-based organizations, property managers, state and local elected officials, and other state and federal agencies.

There are many benefits to these partnerships: risk and commitment are shared; the principle of reciprocity requires that local communities demonstrate an awareness of their needs and a willingness to participate actively in solving problems, therefore local communities play an active role in tailoring the project to their needs; partners are able to concentrate specifically on their area of expertise; and a greater variety of resources insure a well targeted, more affordable product.

**Identify actions taken to overcome the effects of any impediments identified in the jurisdictions analysis of impediments to fair housing choice. 91.520(a)**

**HOME and ESG**

Through rule provision, outreach and training, and monitoring, TDHCA works to ensure that its housing and assistance programs are furthering fair housing choice and reducing barriers for protected classes and low income residents in Texas as required by HUD. The Texas Workforce Commission's ("TWC") Civil Rights Division is tasked with enforcing the Fair Housing Act as well as the State of Texas' Fair Housing Act, which was passed in 1989 and prohibits discrimination based on race, color, national origin, sex, religion, familial status, and disability status in homeownership or rental housing opportunities. TDHCA is currently working with TWC to ensure that prospective applicants and residents are aware of TWC's complaint process and that owners and management agents operating TDHCA monitored properties are aware of their responsibilities under the Federal and State Fair Housing Act. TWC offers free, web-based fair housing training. TDHCA and TWC have a Memorandum of Understanding outlining the agency's roles, strengthening collaboration and the management of complaints. The MOU requires mandated reporting from both agencies for uncorrected fair housing violations.

TDHCA staff utilizes a Fair Housing Tracking Database that assists the state in consolidating fair housing records across programs and funding streams as well as track goals under the Analysis of Impediments. The database allows TDHCA to better review current efforts and identify areas for improvement. Database reports are shared with TDHCA's Board of Directors periodically.

The ESG Program worked in collaboration with TDHCA's Legal Division and the TDHCA Fair Housing Project Manager to create a Fair Housing component of the 2015 ESG Implementation Webinar. In January 2016, ESG, Legal, and Fair Housing staff collaborated to create a webinar on Coordinated Access and Fair Housing. When implementing coordinated access, ESG Subrecipients were trained to make sure homelessness diversion and homelessness prevention was provided evenly across protected classes, and Subrecipients consider needs of protected classes when connecting clients to resources.

The 2016 ESG applications required submission of a Language Access Plan for persons with Limited English Proficiency. This includes providing applications, forms and educational materials in English and Spanish as well as other languages as appropriate for the service area. Language access plans assist with fair housing barriers based on national origin. Staff requested a HUD waiver for the flexibility to exceed Fair Market Rents in areas in which the PHA had an approved payment standard that was higher than the FMR and for persons with disabilities. Exceeding the FMR will allow the Department to affirmatively promote fair housing choice by expanding participants' ability to move or remain in higher opportunity neighborhoods that may have a more expensive rental market.

The HOME program has a 5% set-aside to serve persons with disabilities; funds may be used statewide including in Participating Jurisdictions. Minimum Construction Standards were revised to utilize some universal design concepts, increasing the stock of housing that is available for persons with disabilities. Tenant Based Rental Assistance is encouraged as a bridge to Project Access, prioritizing individuals residing in institutions, waiting to receive a Project Access voucher, transitioning into community based settings.

### **CDBG**

TDHCA uses CDBG funds in Colonia Self-Help Centers, providing a number of programs and services including credit and debt counseling related to home purchase and finance. These programs assist households in re-establishing credit. Self Help Centers play an integral role in providing information to persons with Limited English Proficiency along the border. The Texas Bootstrap Loan program is a self-help housing construction program which may be used toward suitable housing within or outside of a Colonia area, protecting fair housing choice and opportunity. TDA conducts training and provides educational material to the participating units of general local government on federal and state fair housing laws and procedures, including technical assistance. The following are examples of this performance: Texas State Fair: TDA conducted a new activity at the Texas State Fair to educate communities and residents and to promote Fair Housing goals throughout the state. For three weeks, the booth proclaiming 'Fair Housing Matters!' provided kids coloring activities and fair housing information, distributing thousands of coloring sheets and over 700 Fair Housing bags with information from TWC. The Texas State Fair estimates that over 2 million attendees visited the pavilion.



release announcing Fair Housing Month: Commissioner of Agriculture Sid Miller released a statement during Fair Housing Month under the heading 'Housing Discrimination is not Tolerated in Texas.'  
Contractor Certifications: All applicants for the CDBG funds must certify that they will take action to affirmatively further fair housing. This certification must be signed and submitted with the initial application for funding and is also included in the contract, if awarded. This certification is discussed at the application workshops and is clearly noted in the application guides.  
Planning Activities: Contracts awarded under the Planning and Capacity Building Fund are required to include fair housing elements in several planning components, including housing inventory analysis, capital improvement needs planning, analysis of zoning ordinances, and overall planning strategies.  
Civil Rights and Fair Housing Technical Assistance: Texas CDBG has assigned a staff member to be responsible for the fair housing and civil rights requirements of the program. Staff addresses questions from the grantees and general public regarding civil rights, provides copies of civil rights laws and fair housing brochures upon request, and makes any appropriate referrals on an on-going basis.  
Project Implementation Manual: A copy of the TxCDBG Project Implementation Manual was made available to all new grantees and to the public via the TDA website to assist in the administration of project activities and to inform entities of applicable laws and regulations. This manual includes a chapter regarding fair housing and equal opportunity with information, forms, checklists, and recommended activities to ensure compliance with all regulations.  
Monitoring of Civil Rights Requirements: Texas CDBG administers on average between 600 and 800 open CDBG contracts throughout the year. Program Monitors review each contractor for civil rights requirements using a detailed checklist on civil rights and fair housing requirements. Contracts are not administratively closed until the civil rights and fair housing requirements are met.

## **CR-40 - Monitoring 91.220 and 91.230**

**Describe the standards and procedures used to monitor activities carried out in furtherance of the plan and used to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements**

### **HOME and ESG Monitoring**

The Compliance Division of TDHCA has three sections that are involved in monitoring HOME and/or ESG: Contract Monitoring, Compliance Monitoring, and Physical Inspections. The Contract Monitoring section monitors HOME TBRA, Homeowner Rehabilitation Assistance, Homebuyer Assistance, and all activities under ESG. This section also ensures compliance with Davis Bacon, Uniform Relocation Act, and other requirements during the construction of HOME rental developments. The Compliance Monitoring section ensures compliance with HOME income/rent restrictions, as well as affirmative marketing, tenant selection criteria, and other mandates, as applicable. The Physical Inspections section ensures compliance with property condition standards and accessibility for HOME and ESG. Owners and administrators are notified about 30 days prior to monitoring. Monitors use standardized checklists to ensure compliance with program requirements. Noncompliance is communicated in written format. HOME rental developments' Loan Commitments and/or Contracts include areas for Section 3 Compliance and Minority/Women's Enterprise requirements. The General Contractor must provide a narrative of efforts they have made to meet these requirements prior to releasing the final draw and/or retainage.

HOME TBRA, Homeowner Rehabilitation Assistance, Homebuyer Assistance, and ESG are monitored based on risk factors that include the amount of funds spent, complaints, prior monitoring results, and single audit findings. Based on risk, the review may be conducted onsite or through a desk review. If HOME properties fall into material or ongoing non-compliance or have financial/operational issues that require intervention, TDHCA's Asset Management Division works with the owner to determine the most effective workout/resolution strategy. The two primary goals for HOME-assisted developments is to restore compliance with the Land Use Restrictive Agreement ("LURA") and facilitate repayment of the loan under the originally agreed upon terms.

### **HOPWA Monitoring**

AAs act as an administrative arm for DSHS, with DSHS oversight, by administering the HOPWA program locally for a five-year project period. AAs must comply with all federal and state regulations, policies, standards, and guidelines as specified in their contractual Statement of Work. AAs must confirm that Project Sponsors manage program funds in compliance with HUD and DSHS regulations. The DSHS HOPWA Coordinator monitors AA program activities for the HIV/STD Prevention and Care Branch. This monitoring involves periodic site and technical assistance visits to AAs and Project Sponsors. AAs and Project Sponsors (through their AAs) must submit Semi-Annual and Year-End Program Progress Reports (PPRs) to DSHS. In addition, AAs must submit Exhibit A to report Semi-Annual and Year-End expenditures

for their Project Sponsors. AAs submit monthly billing reports and quarterly financial status reports. DSHS Contract Oversight and Support Section conducts fiscal audits. The DSHS Contract Management Unit serves as liaisons between DSHS and the AA, and maintains monitoring records. Principles for fiscal administration are established by the Texas Uniform Grants Management Standards ([www.governor.state.tx.us/files/state-grants/UGMS062004.doc](http://www.governor.state.tx.us/files/state-grants/UGMS062004.doc)). DSHS monitoring requirements are located at <http://www.dshs.state.tx.us/hivstd/pops/default.shtm>.

### **CDBG Monitoring**

TDA ensures compliance through monitoring of CDBG funded projects. Each community is reviewed for compliance with previous awards prior to the award of new funds. Contracts include federal and state requirements which are monitored through an objective risk assessment to determine the appropriate level of monitoring. The areas reviewed include procurement, financial management, environmental records, construction contracts, client files for rehabilitation services, labor standards, single audits, and fair housing and civil rights policies. The Compliance unit and the Project Management unit communicate throughout the contract implementation phase of contracts to identify and possibly resolve issues prior to the monitoring phase. The Colonia SHC activities are facilitated through a Memorandum of Understanding between TDHCA and TDA, with the TDHCA providing the majority of oversight.

### **Citizen Participation Plan 91.105(d); 91.115(d)**

**Describe the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.**

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, online discussion forums, 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.

To reach minorities and non-English speaking residents, the Plan outreach follows TDHCA's Language Access Plan. Also, the notices are available in Spanish and English, per Texas Government Code Chapter 2105. Translators will be made available at public meetings, if requested.

The State notifies stakeholders and communities in areas where CDBG funds are proposed for use by distributing information on public hearings through the CDBG email list from TDA. Information related to the Plan and opportunities for feedback were provided through webinars and web discussions that 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.

Due to the short 90-day turnaround time of the 2016 CAPER, between the end of HUD's Program Year (January 31, 2016) and the April 30, 2016 due date, the public will be given reasonable notice by publication in the *Texas Register* and on TDHCA's website at <http://www.tdhca.state.tx.us>. The 15-day public comment period began Friday, April 1, 2016, and continued until 6:00 pm Austin Local Time on Friday, April 15, 2016. A summary of public comments is provided in attachment 2.

**CR-45 - CDBG 91.520(c)**

**Specify the nature of, and reasons for, any changes in the jurisdiction’s program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.**

Although TDA’s program objectives have not changed, the 2016 Action Plan includes the following program initiatives to address rural communities’ need for economic development:

1. A new fund called the Small and Microenterprise Revolving Fund (SMRF) has been created to provide capital for rural communities to invest in new and/or existing small businesses and microenterprises. In cooperation with a qualified, nonprofit development organization (NDO), SMRF monies will be loaned to local small businesses and microenterprises through the creation of a revolving loan fund (RLF) to support job creation/retention activity for predominately low and moderate income persons. \$ 1,500,000 in program income funds will initially fund this program.

2. TDA is also modifying funding for its Small Towns Environment Program (STEP). The program provides funds to eligible applicants for water and sewer infrastructure improvements utilizing self-help methods. The community must provide local volunteer labor and available material resources such as equipment in order to demonstrate a 40% cost saving off the retail construction price of the water or sewer project. Funding for this program has been changed from a percentage of the allocation to a set-aside of deobligated funds, and changing from a competitive funding process to a first-come-first served model. This will allow TDA to focus funding on the appropriate projects as they are ready to proceed, rather than needing to coordinate volunteers activities with the federal funding deadlines.

3. Maximum grant amounts for several fund categories, including colonia funding and the Main Street / Downtown Revitalization programs, will be increased in order to fund meaningful and effective projects with current construction prices.

<b>Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?</b>	No
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**[BEDI grantees] Describe accomplishments and program outcomes during the last year.**

## **CR-50 - HOME 91.520(d)**

### **Include the results of on-site inspections of affordable rental housing assisted under the program to determine compliance with housing codes and other applicable regulations**

Please list those projects that should have been inspected on-site this program year based upon the schedule in §92.504(d). Indicate which of these were inspected and a summary of issues that were detected during the inspection. For those that were not inspected, please indicate the reason and how you will remedy the situation.

For a list of results of on-site inspections of affordable rental housing assisted by TDHCA, see *Attachment 1 - TDHCA On-site Inspection Report*. In preparation of this report, the TDHCA recognized that many of the properties are cited with noncompliance under the category "Noncompliance related to Affirmative Marketing requirements described in §10.617 of this chapter". The monitoring activity in the attached is reflective of onsite reviews conducted February 1, 2015 through January 31, 2016, which includes the timeframe in which TDHCA adopted a new rule related to Affirmative Marketing (10 TAC §10.617). The rule was adopted in the Texas Administrative Code on January 8, 2015, and implementation of the rule was delayed until April 1, 2015. During that time, TDHCA conducted a webinar to provide training and technical assistance to owners and managers on the new rule. That presentation along with the slides are still available for viewing at (<http://www.tdhca.state.tx.us/pmcomp/presentations.htm>). While Affirmative Marketing has always been a requirement, the new rule prescribes the method by which an owner would identify their housing market and groups least likely to apply. An Affirmative Marketing Web Tool (<http://public.tdhca.state.tx.us/amtp/AMT.go.main>) was created to assist in crafting a compliant Affirmative Marketing Plan; as well as a guide to use the web tool and outreach census data to assist to marketing efforts. All Department trainings have been updated and the Department continues to conduct outreach and technical assistance to ensure that our partners have a clear understanding and the tools they need to comply.

### **Provide an assessment of the jurisdiction's affirmative marketing actions for HOME units. 92.351(b)**

Compliance rules in 10 TAC §10.617 require that owners of Developments with five or more total units must affirmatively market their units to promote equal housing choice for prospective tenants, regardless of race, color, religion, sex, national origin, familial status, or disability and must develop and carry out an Affirmative Fair Housing Marketing Plan (or "Affirmative Marketing Plan") to provide for marketing strategies and documentation of outreach efforts to prospective applicants identified as "least likely to apply." Furthermore, an Affirmative Fair Housing Marketing Plan (HUD Form 935.2a) is required of all applicants for HOME multifamily funds, and is also required for single family activities under the Single Family Programs Umbrella Rule at §20.9. Multifamily affirmative marketing rules were revised in 2015. The new rule will guides owners and managers in identifying "least likely to apply" populations using HUD's definition of minority concentration and seek to clarify and expand on HUD's definition of a "market area". The Department hosted roundtables for feedback and created a tool to

assist in comparing tenant pool data (or in the case of new construction developments, census tract demographic data) to MSA or County demographic census data. TDHCA's board in December 2015 approved the new SF affirmative marketing rule requiring an Affirmative Marketing Plan—HUD Form 935.2B or equivalent plan. Staff is developing a training to assist SF activities in complying with the rule to affirmatively marking and promote choice and opportunity for those considered "least likely" to know about or apply for housing based on an evaluation of market area data.

**Refer to IDIS reports to describe the amount and use of program income for projects, including the number of projects and owner and tenant characteristics**

TDHCA received approximately \$10.1 million in Program Income. Of that, 10% was reserved for administration and approximately \$9.1 million went back into projects. During this reporting cycle, program income was used to fund 167 homeowner rehabilitation assistance activities and 13 multifamily rental activities (nearly \$1.75 million). TDHCA's HOME Multifamily program requires that 20% of units be set aside for households at or below 50% Area Median Income ("AMI") at Low HOME Rent or less, consistent with 24 CFR §92.252. Household eligibility for the remaining 80% of HOME Multifamily units is set at or below 80% AMI at the High HOME rent level. However, many developers set household eligibility for the remaining 80% of HOME Multifamily units at or below 60% AMI or at the High HOME rent level, in order to align with Low-Income Housing Tax Credit ("LIHTC") requirements. Owner characteristics of Multifamily HOME developments align with 24 CFR §92.300, in that 15% of HOME funds designated for multifamily activities are awarded to Community Housing Development Organizations ("CHDOs") and the remaining 85% of funds designated for multifamily activities are awarded to for-profit owners or developers.

**Describe other actions taken to foster and maintain affordable housing. 91.220(k) (STATES ONLY: Including the coordination of LIHTC with the development of affordable housing). 91.320(j)**

As discussed above, many HOME-assisted multifamily developments are paired with tax-exempt bond and/or Housing Tax Credits ("HTC"). TDHCA rules that govern the HTC Program include incentives for developments utilizing the 9% HTC (competitive HTC) in high opportunity areas which are defined as high-income, low-poverty areas and are not typically minority-concentrated. However, the rules also provide incentives to develop in colonias or economically distressed areas. Developments using tax-exempt bond financing and 4% HTC (non-competitive HTC) are more frequently located in qualified census tracts due to federal guidelines that cause these to be more financially viable.

## CR-55 - HOPWA 91.520(e)

### Identify the number of individuals assisted and the types of assistance provided

Table for report on the one-year goals for the number of households provided housing through the use of HOPWA activities for: short-term rent, mortgage, and utility assistance payments to prevent homelessness of the individual or family; tenant-based rental assistance; and units provided in housing facilities developed, leased, or operated with HOPWA funds.

<b>Number of Households Served Through:</b>	<b>One-year Goal</b>	<b>Actual</b>
Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family	470	386
Tenant-based rental assistance	445	457
Units provided in permanent housing facilities developed, leased, or operated with HOPWA funds	0	0
Units provided in transitional short-term housing facilities developed, leased, or operated with HOPWA funds	0	0

**Table 14 – HOPWA Number of Households Served**

### Narrative

Project Sponsors reported less need for STRMU than was originally projected so they prioritized TBRA services instead.



## CR-60 - ESG 91.520(g) (ESG Recipients only)

### ESG Supplement to the CAPER in *e-snaps*

#### For Paperwork Reduction Act

### 1. Recipient Information—All Recipients Complete

#### Basic Grant Information

Recipient Name	TEXAS
Organizational DUNS Number	806781902
EIN/TIN Number	742610542
Identify the Field Office	FT WORTH
Identify CoC(s) in which the recipient or subrecipient(s) will provide ESG assistance	San Antonio/Bexar County CoC

#### ESG Contact Name

Prefix	Mr
First Name	Michael
Middle Name	0
Last Name	De Young
Suffix	0
Title	Community Affairs Division Director

#### ESG Contact Address

Street Address 1	221 E. 11th Street
Street Address 2	0
City	Austin
State	TX
ZIP Code	78711-3941
Phone Number	5124752125
Extension	0
Fax Number	5124753935
Email Address	michael.deyoung@tdhca.state.tx.us

#### ESG Secondary Contact

Prefix	Ms
First Name	Cathy
Last Name	Collingsworth
Suffix	0
Title	Fiscal and Reporting Manager
Phone Number	5124753858
Extension	0
Email Address	cathy.collingsworth@tdhca.state.tx.us

**2. Reporting Period—All Recipients Complete**

**Program Year Start Date** 02/01/2015  
**Program Year End Date** 01/31/2016

**3a. Subrecipient Form – Complete one form for each subrecipient**

**Subrecipient or Contractor Name:** ADVOCACY OUTREACH

**City:** Elgin

**State:** TX

**Zip Code:** 78621, 2937

**DUNS Number:**

**Is subrecipient a victim services provider:** Y

**Subrecipient Organization Type:** Other Non-Profit Organization

**ESG Subgrant or Contract Award Amount:** 604627

**Subrecipient or Contractor Name:** SAN ANTONIO METROPOLITAN MINISTRY, INC.

**City:** San Antonio

**State:** TX

**Zip Code:** 78216, 7017

**DUNS Number:**

**Is subrecipient a victim services provider:** N

**Subrecipient Organization Type:** Other Non-Profit Organization

**ESG Subgrant or Contract Award Amount:** 780295

**Subrecipient or Contractor Name:** SERVICE OF THE EMERGENCY AID RESOURCE CENTER FOR THE HOMELESS

**City:** Houston

**State:** TX

**Zip Code:** 77002, 9115

**DUNS Number:** 785823600

**Is subrecipient a victim services provider:** N

**Subrecipient Organization Type:** Other Non-Profit Organization

**ESG Subgrant or Contract Award Amount:** 804627

**Subrecipient or Contractor Name:** THE BRIDGE OVER TROUBLED WATERS, INC

**City:** Pasadena

**State:** TX

**Zip Code:** 77501, 3488

**DUNS Number:** 174065052

**Is subrecipient a victim services provider:** N

**Subrecipient Organization Type:** Other Non-Profit Organization

**ESG Subgrant or Contract Award Amount:** 871410

**Subrecipient or Contractor Name:** PROJECT VIDA PVCDC

**City:** El Paso

**State:** TX

**Zip Code:** 79905, 2415

**DUNS Number:** 791970320

**Is subrecipient a victim services provider:** N

**Subrecipient Organization Type:** Other Non-Profit Organization

**ESG Subgrant or Contract Award Amount:** 353547

**Subrecipient or Contractor Name:** SHARED HOUSING CENTER

**City:** Dallas

**State:** TX

**Zip Code:** 75204, 5814

**DUNS Number:** 052767832

**Is subrecipient a victim services provider:** N

**Subrecipient Organization Type:** Other Non-Profit Organization

**ESG Subgrant or Contract Award Amount:** 315730

**Subrecipient or Contractor Name:** THE FAMILY PLACE

**City:** Dallas

**State:** TX

**Zip Code:** 75209, 0999

**DUNS Number:** 002933091

**Is subrecipient a victim services provider:** N

**Subrecipient Organization Type:** Other Non-Profit Organization

**ESG Subgrant or Contract Award Amount:** 1204627

**Subrecipient or Contractor Name:** CATHOLIC CHARITIES OF THE ARCHDIOCESE OF GALVESTON-HOUSTON

**City:** Houston

**State:** TX

**Zip Code:** 77006, 3435

**DUNS Number:** 125303896

**Is subrecipient a victim services provider:** N

**Subrecipient Organization Type:** Faith-Based Organization

**ESG Subgrant or Contract Award Amount:** 553715

**Subrecipient or Contractor Name:** CORPUS CHRISTI HOPE HOUSE, INC.

**City:** Corpus Christi

**State:** TX

**Zip Code:** 78404, 2521

**DUNS Number:** 948815337

**Is subrecipient a victim services provider:** N

**Subrecipient Organization Type:** Other Non-Profit Organization

**ESG Subgrant or Contract Award Amount:** 273464

**Subrecipient or Contractor Name:** AMARILLO, CITY

**City:** Amarillo

**State:** TX

**Zip Code:** 79105,

**DUNS Number:** 786202994

**Is subrecipient a victim services provider:** N

**Subrecipient Organization Type:** Unit of Government

**ESG Subgrant or Contract Award Amount:** 221331

**Subrecipient or Contractor Name:** SALVATION ARMY-WACO

**City:** Waco

**State:** TX

**Zip Code:** 76703,

**DUNS Number:** 828097704

**Is subrecipient a victim services provider:** N

**Subrecipient Organization Type:** Faith-Based Organization

**ESG Subgrant or Contract Award Amount:** 96808

**Subrecipient or Contractor Name:** FAMILY ABUSE CENTER, INC.

**City:** Waco

**State:** TX

**Zip Code:** 76710,

**DUNS Number:** 956512610

**Is subrecipient a victim services provider:** Y

**Subrecipient Organization Type:** Other Non-Profit Organization

**ESG Subgrant or Contract Award Amount:** 72876

**Subrecipient or Contractor Name:** FAMILY VIOLENCE PREVENTION SERVICES, INC.

**City:** San Antonio

**State:** TX

**Zip Code:** 78209,

**DUNS Number:** 161804901

**Is subrecipient a victim services provider:** Y

**Subrecipient Organization Type:** Other Non-Profit Organization

**ESG Subgrant or Contract Award Amount:** 150000

**Subrecipient or Contractor Name:** FRIENDSHIP OF WOMEN, INC.

**City:** Brownsville

**State:** TX

**Zip Code:** 78521,

**DUNS Number:** 015226129

**Is subrecipient a victim services provider:** N

**Subrecipient Organization Type:** Other Non-Profit Organization

**ESG Subgrant or Contract Award Amount:** 982161

**Subrecipient or Contractor Name:** LA POSADA PROVIDENCIA

**City:** San Benito

**State:** TX

**Zip Code:** 78586,

**DUNS Number:** 610343464

**Is subrecipient a victim services provider:** N

**Subrecipient Organization Type:** Other Non-Profit Organization

**ESG Subgrant or Contract Award Amount:** 1129199

**Subrecipient or Contractor Name:** MID-COAST FAMILY SERVICES, INC.

**City:** Victoria

**State:** TX

**Zip Code:** 77901,

**DUNS Number:** 790072524

**Is subrecipient a victim services provider:** N

**Subrecipient Organization Type:** Other Non-Profit Organization

**ESG Subgrant or Contract Award Amount:** 435540

**Subrecipient or Contractor Name:** YOUTH AND FAMILY ALLIANCE DBA LIFEWORKS

**City:** Austin

**State:** TX

**Zip Code:** 78704,

**DUNS Number:** 137614244

**Is subrecipient a victim services provider:** Y

**Subrecipient Organization Type:** Other Non-Profit Organization

**ESG Subgrant or Contract Award Amount:** 802097

**Subrecipient or Contractor Name:** CITY OF DENTON

**City:** Denton

**State:** TX

**Zip Code:** 76205,

**DUNS Number:** 071380190

**Is subrecipient a victim services provider:** N

**Subrecipient Organization Type:** Unit of Government

**ESG Subgrant or Contract Award Amount:** 653842

**Subrecipient or Contractor Name:** SHELTER AGENCIES FOR FAMILIES IN EAST TEXAS

**City:** Mt. Pleasant

**State:** TX

**Zip Code:** 75455,

**DUNS Number:** 024049913

**Is subrecipient a victim services provider:** Y

**Subrecipient Organization Type:** Other Non-Profit Organization

**ESG Subgrant or Contract Award Amount:** 299689

**Subrecipient or Contractor Name:** WOMEN'S SHELTER OF EAST TEXAS, INC.

**City:** Lufkin

**State:** TX

**Zip Code:** 75902,

**DUNS Number:** 164747693

**Is subrecipient a victim services provider:** Y

**Subrecipient Organization Type:** Other Non-Profit Organization

**ESG Subgrant or Contract Award Amount:** 275000

**Subrecipient or Contractor Name:** SAN ANTONIO FAMILY ENDEAVORS, INC.

**City:** San Antonio

**State:** TX

**Zip Code:** 78228,

**DUNS Number:** 118914498

**Is subrecipient a victim services provider:** N

**Subrecipient Organization Type:** Other Non-Profit Organization

**ESG Subgrant or Contract Award Amount:** 647860

**Subrecipient or Contractor Name:** Alliance of Community Assistance Ministries, Inc.

**City:** Houston

**State:** TX

**Zip Code:** 77056, 6660

**DUNS Number:** 067630032

**Is subrecipient a victim services provider:** N

**Subrecipient Organization Type:** Other Non-Profit Organization

**ESG Subgrant or Contract Award Amount:** 755177

**Subrecipient or Contractor Name:** City of Beaumont

**City:** Beaumont

**State:** TX

**Zip Code:** 77701, 3548

**DUNS Number:** 073901118

**Is subrecipient a victim services provider:** N

**Subrecipient Organization Type:** Unit of Government

**ESG Subgrant or Contract Award Amount:** 165329

**Subrecipient or Contractor Name:** Matagorda County Women's Center

**City:** Bay City

**State:** TX

**Zip Code:** 77404, 1820

**DUNS Number:** 800512840

**Is subrecipient a victim services provider:** Y

**Subrecipient Organization Type:** Other Non-Profit Organization

**ESG Subgrant or Contract Award Amount:** 302288

**Subrecipient or Contractor Name:** Salvation Army - Corpus Christi

**City:** Corpus Christi

**State:** TX

**Zip Code:** 78403, 2507

**DUNS Number:** 080617504

**Is subrecipient a victim services provider:** N

**Subrecipient Organization Type:** Faith-Based Organization

**ESG Subgrant or Contract Award Amount:** 604627

**Subrecipient or Contractor Name:** Salvation Army - El Paso

**City:** El Paso

**State:** TX

**Zip Code:** 79995, 0756

**DUNS Number:** 080667731

**Is subrecipient a victim services provider:** N

**Subrecipient Organization Type:** Faith-Based Organization

**ESG Subgrant or Contract Award Amount:** 150000

**Subrecipient or Contractor Name:** Tarrant County Homeless Coalition

**City:** Fort Worth

**State:** TX

**Zip Code:** 76147, 1406

**DUNS Number:** 824740125

**Is subrecipient a victim services provider:** N

**Subrecipient Organization Type:** Other Non-Profit Organization

**ESG Subgrant or Contract Award Amount:** 1182863



**Subrecipient or Contractor Name:** Salvation Army - Tyler

**City:** Tyler

**State:** TX

**Zip Code:** 75710, 2050

**DUNS Number:** 189974447

**Is subrecipient a victim services provider:** N

**Subrecipient Organization Type:** Faith-Based Organization

**ESG Subgrant or Contract Award Amount:** 904627

**Subrecipient or Contractor Name:** Center Against Family Violence

**City:** El Paso

**State:** TX

**Zip Code:** 79915, 2729

**DUNS Number:** 956326813

**Is subrecipient a victim services provider:** Y

**Subrecipient Organization Type:** Other Non-Profit Organization

**ESG Subgrant or Contract Award Amount:** 147550

**Subrecipient or Contractor Name:** Salvation Army - Houston

**City:** Houston

**State:** TX

**Zip Code:** 77002, 8814

**DUNS Number:** 106822328

**Is subrecipient a victim services provider:** N

**Subrecipient Organization Type:** Faith-Based Organization

**ESG Subgrant or Contract Award Amount:** 162339

**Subrecipient or Contractor Name:** Coalition for the Homeless of Houston/Harris County

**City:** Houston

**State:** TX

**Zip Code:** 77002, 7665

**DUNS Number:** 832250815

**Is subrecipient a victim services provider:** N

**Subrecipient Organization Type:** Other Non-Profit Organization

**ESG Subgrant or Contract Award Amount:** 130350

## CR-65 - Persons Assisted

### 4. Persons Served

#### 4a. Complete for Homelessness Prevention Activities

Number of Persons in Households	Total
Adults	0
Children	0
Don't Know/Refused/Other	0
Missing Information	0
<b>Total</b>	<b>0</b>

Table 15 – Household Information for Homeless Prevention Activities

#### 4b. Complete for Rapid Re-Housing Activities

Number of Persons in Households	Total
Adults	0
Children	0
Don't Know/Refused/Other	0
Missing Information	0
<b>Total</b>	<b>0</b>

Table 16 – Household Information for Rapid Re-Housing Activities

#### 4c. Complete for Shelter

Number of Persons in Households	Total
Adults	0
Children	0
Don't Know/Refused/Other	0
Missing Information	0
<b>Total</b>	<b>0</b>

Table 17 – Shelter Information

**4d. Street Outreach**

<b>Number of Persons in Households</b>	<b>Total</b>
Adults	0
Children	0
Don't Know/Refused/Other	0
Missing Information	0
<b>Total</b>	<b>0</b>

**Table 18 – Household Information for Street Outreach**

**4e. Totals for all Persons Served with ESG**

<b>Number of Persons in Households</b>	<b>Total</b>
Adults	0
Children	0
Don't Know/Refused/Other	0
Missing Information	0
<b>Total</b>	<b>0</b>

**Table 19 – Household Information for Persons Served with ESG**

**5. Gender—Complete for All Activities**

	<b>Total</b>
Male	0
Female	0
Transgender	0
Don't Know/Refused/Other	0
Missing Information	0
<b>Total</b>	<b>0</b>

**Table 20 - Gender Information**

## 6. Age—Complete for All Activities

	Total
Under 18	0
18-24	0
25 and over	0
Don't Know/Refused/Other	0
Missing Information	0
<b>Total</b>	<b>0</b>

Table 21 – Age Information

## 7. Special Populations Served—Complete for All Activities

### Number of Persons in Households

Subpopulation	Total	Total Persons Served – Prevention	Total Persons Served – RRH	Total Persons Served in Emergency Shelters
Veterans	0	0	0	0
Victims of Domestic Violence	0	0	0	0
Elderly	0	0	0	0
HIV/AIDS	0	0	0	0
Chronically Homeless	0	0	0	0
<b>Persons with Disabilities:</b>				
Severely Mentally Ill	0	0	0	0
Chronic Substance Abuse	0	0	0	0
Other Disability	0	0	0	0
Total (Unduplicated if possible)	0	0	0	0

Table 22 – Special Population Served

### Extended Submission Date for CR-65

On March 30, 2016, TDHCA received notification that the HUD Fort Worth Field Office has granted TDHCA's request to extend the submission deadline for the CR-65 report via eCart for the Emergency Solutions Grant until July 29, 2016. This request was granted to allow TDHCA additional time to coordinate with each of the Continuum of Cares and subrecipients throughout Texas in order to obtain accurate data. TDHCA is required to submit the other elements of the Annual ESG Performance Report with the CAPER.

**Submission of CR-65 and eCart Data**

Per the "CAPER Reporting and eCart Guide, Version 1.1, October, 2015" available at <https://www.hudexchange.info/resources/documents/eCart-Guidebook.pdf>, all CR-65 data has been provided in Section CR-00 as a Word document with an embedded Excel file titled "eCart Data for CR-65." Further, ESG Subrecipients that have missing or incomplete data are listed in the Word document titled "Explanations for eCart Data" in Section CR-00. TDHCA, the recipient, will continue to work with these ESG Subrecipients to correct and submit data in future program years. Several domestic violence providers were not able to create CSV files.

## CR-70 – ESG 91.520(g) - Assistance Provided and Outcomes

### 10. Shelter Utilization

Number of New Units - Rehabbed	0
Number of New Units - Conversion	0
Total Number of bed-nights available	254,192
Total Number of bed-nights provided	192,219
Capacity Utilization	75.62%

**Table 23 – Shelter Capacity**

### 11. Project Outcomes Data measured under the performance standards developed in consultation with the CoC(s)

Each year TDHCA releases an electronic ESG survey to receive input from the local CoC member agencies. One of the topics on the survey is the TDHCA-required performance measures. TDHCA routinely receives comments about reducing the number of measures or adding new measures. In general, TDHCA strives to have its performance measures closely resemble the measures in the CAPER in order to ensure that federal requirements are met and minimize time ESG Subrecipients spend reporting.

## CR-75 – Expenditures

### 11. Expenditures

#### 11a. ESG Expenditures for Homelessness Prevention

	Dollar Amount of Expenditures in Program Year		
	2013	2014	2015
Expenditures for Rental Assistance	45,100	730,260	192,536
Expenditures for Housing Relocation and Stabilization Services - Financial Assistance	0	80,909	41,021
Expenditures for Housing Relocation & Stabilization Services - Services	6,300	248,982	85,561
Expenditures for Homeless Prevention under Emergency Shelter Grants Program	0	0	0
<b>Subtotal Homelessness Prevention</b>	<b>51,400</b>	<b>1,060,151</b>	<b>319,118</b>

Table 24 – ESG Expenditures for Homelessness Prevention

#### 11b. ESG Expenditures for Rapid Re-Housing

	Dollar Amount of Expenditures in Program Year		
	2013	2014	2015
Expenditures for Rental Assistance	0	1,067,965	188,514
Expenditures for Housing Relocation and Stabilization Services - Financial Assistance	0	300,624	106,376
Expenditures for Housing Relocation & Stabilization Services - Services	0	735,845	133,452
Expenditures for Homeless Assistance under Emergency Shelter Grants Program	0	0	0
<b>Subtotal Rapid Re-Housing</b>	<b>0</b>	<b>2,104,434</b>	<b>428,342</b>

Table 25 – ESG Expenditures for Rapid Re-Housing

#### 11c. ESG Expenditures for Emergency Shelter

	Dollar Amount of Expenditures in Program Year		
	2013	2014	2015
Essential Services	83,420	882,384	416,082
Operations	91,094	889,044	355,152
Renovation	0	0	0
Major Rehab	0	0	0
Conversion	0	0	0
<b>Subtotal</b>	<b>174,514</b>	<b>1,771,428</b>	<b>771,234</b>

Table 26 – ESG Expenditures for Emergency Shelter

### 11d. Other Grant Expenditures

	Dollar Amount of Expenditures in Program Year		
	2013	2014	2015
HMIS	0	354,681	94,530
Administration	9,749	184,180	53,737
Street Outreach	8,084	405,992	152,279

Table 27 - Other Grant Expenditures

### 11e. Total ESG Grant Funds

Total ESG Funds Expended	2013	2014	2015
7,377,498	235,663	5,474,874	1,666,961

Table 28 - Total ESG Funds Expended

### 11f. Match Source

	2013	2014	2015
Other Non-ESG HUD Funds	0	556,280	99,597
Other Federal Funds	0	1,109,823	155,340
State Government	0	305,899	156,515
Local Government	0	52,280	2,911
Private Funds	0	2,246,259	926,514
Other	0	1,329,233	328,405
Fees	0	0	0
Program Income	0	124,843	0
<b>Total Match Amount</b>	<b>0</b>	<b>5,724,617</b>	<b>1,669,282</b>

Table 29 - Other Funds Expended on Eligible ESG Activities

### 11g. Total

Total Amount of Funds Expended on ESG Activities	2013	2014	2015
14,771,397	235,663	11,199,491	3,336,243

Table 30 - Total Amount of Funds Expended on ESG Activities

Breakout of Prior Year Funds Expended During FY 2014	2010 ESGP	2011 ESGP	2012 ESG	GRAND TOTAL
Homelessness Prevention	186,299			
Essential Services	125,080	58,976	100,087	
Operations	92,292	1,332	53,404	
Administration	16,482			
.....SUBTOTAL	420,153	60,308	153,491	
Tenant-based rental assistance-HP		19,357	200,290	
Housing Relocation and Stabilization Services-HP Financial		18,681	2,733	



Housing Relocation and Stabilization Services-HP Services		14,655	59,977	
.....SUBTOTAL		52,693	262,999	
Tenant-based rental assistance-RRH		36,785	115,561	
Housing Relocation and Stabilization Services-RRH Financial		8,517	2,865	
Housing Relocation and Stabilization Services-RRH Services			23,273	
.....SUBTOTAL		45,303	141,698	
Street Outreach		6,369	5,131	
Homeless Management Information System (HMIS)		0	9,694	
Administrative Costs		0	10,534	
GRAND TOTAL	420,153	164,672	583,548	1,168,373

**Table 30 - Breakout of Prior Year Funds Expended During FY 2014**

# Attachment

## TDHCA On-site Inspection Report

2016 CAPER

TDHCA On-Site Inspection Report

Attachment 1

CMTS	HOME	Development	Date of File Review	Description of Noncompliance	Status of Noncompliance
544	1001591	Cottonwood Apartments	5/1/15	Noncompliance related to Affirmative Marketing requirements	Corrected
870	1001076	Alta Vista I & II	1/28/16	None	N/A
1051	1001684	Stepping Stone & Taylor Square Apartments	6/25/15	Noncompliance related to Affirmative Marketing requirement	Corrected
1130	1001679	Elmwood Apartments	2/25/15	Noncompliance related to Affirmative Marketing requirement; Noncompliance with lease requirements (§92.355 and §570.487(c) - failure to provide lead based paint disclosure; UPCS violation	Corrected
1303	1001590	Northwood Apartments	2/25/15	Noncompliance related to Affirmative Marketing requirements	Corrected
1304	1001591	Oakwood Apartments	2/25/15	Noncompliance related to Affirmative Marketing requirements; Noncompliance with lease requirements (§92.253(c) - failure to provide 30 day notice for termination	Corrected
1904	538003	Nueces Bend at Two Rivers Place	3/13/15	None	N/A
2603	539111	Bavarian Manor Apartments	3/31/15	Noncompliance related to Affirmative Marketing requirements; Failure to execute required lease provisions or exclude prohibited lease language (§92.253)	Corrected
2605	539109	Angelica Homes	11/1/15	UPCS violation	Corrected
2612	532322	Claremont Apartments	9/15/15	UPCS violation	Corrected
2615	538610	Denton Affordable Housing	3/3/15	Noncompliance related to Affirmative Marketing requirements	Owner has been referred to the Department's Enforcement Committee for Affirmative Marketing requirements
2616	537605	Denver City Multi-family	12/9/15	UPCS violation	Corrected
2618	534031	Rincon Point Apartments	3/1/15	UPCS violation	Corrected
2619	531105	Garden Terrace Apartments	2/18/15	UPCS violation	Corrective action due 4/26/2016

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CMTS	HOME	Development	Date of File Review	Description of Noncompliance	Status of Noncompliance
2623	537602	Hillside Senior Community	6/24/15	None	N/A
2625	533345	Juan Linn Apts	5/1/15	Noncompliance related to Affirmative Marketing requirements	Corrected
2626	536268	Keystone Apartments	11/1/15	UPCS violation	Corrected
2630	539098	Levelland Multi-family	5/19/15	Owner did not properly calculate utility allowance	Corrected
2636	532305	Freeport Apartments	5/14/15	Household income above limit upon initial occupancy (219,505); Noncompliance related to Affirmative Marketing requirement; Owner failed to correctly document tenant's annual income recertification (409); Noncompliance with lease requirements (§92.253(c) - failure to provide 30 day notice for termination	Corrected
2643	537601	Notre Dame Hills	12/1/15	UPCS violation	Corrected
2646	535247B	Olton Multifamily Housing	5/19/15	None	N/A
2653	539113	Piney Woods Home	5/15/15	Owner did not properly calculate utility allowance; Affirmative Marketing requirement; Owner failed to correctly document tenant's annual income recertification (311,608,908,1202,1306)	Corrected
2654	539099	Grandview Retirement Village	8/1/15	UPCS violation	Corrected
2658	532315	Plainview II	12/9/15	UPCS violation	Corrected
2659	538625	Prado II Apartments	6/25/15	UPCS violation	Corrected

CMTS	HOME	Development	Date of File Review	Description of Noncompliance	Status of Noncompliance
2664	532331	Jose Gonzales Homes	11/1/15	UPCS violation	Owner has been referred to the Department's Enforcement Committee
2668	532307	Doroteo N. Garza Homes	7/16/15	Owner did not properly calculate utility allowance; Affirmative Marketing requirement; Owner failed to allow monitoring	Owner has been referred to the Department's Enforcement Committee
2671	534284	Cedar Ridge Apartments	8/31/15	Household income above limit upon initial occupancy (222); Gross rent exceeds limit (127); UPCS violation	Corrected
2675	535248	Olton Multifamily Housing	5/19/15	Owner did not properly calculate utility allowance; Affirmative Marketing requirement; Household income above limit upon initial occupancy (315 -14th street)	Corrected
2676	533303	Colorado City Homes	11/1/15	UPCS violation	Corrected
2677	534341	Colorado City Homes II	11/1/15	UPCS violation	Corrected
2685	535004	Jourdanton Elderly Housing	5/13/15	Owner did not properly calculate utility allowance; Affirmative Marketing requirement	Owner has been referred to the Department's Enforcement Committee
2686	536294	Leaning Oaks Seniors	2/24/15	Noncompliance related to Affirmative Marketing requirements	Corrected

CMTS	HOME	Development	Date of File Review	Description of Noncompliance	Status of Noncompliance
2693	530647	Special Needs Rental Housing	1/22/16	Noncompliance related to Affirmative Marketing requirements; UPCS violation	Corrective action due 5/31/2016; UPCS corrected
2694	533300	Spur Triplex	9/29/15	Owner did not properly calculate utility allowance	Corrective action due 6/27/2016
2695	539114	St. Michael Estates	9/4/15	None	N/A
2696	532303	Sterling Park Square	1/22/16	Noncompliance related to Affirmative Marketing requirements; Household income above limit upon initial occupancy (405)	Corrective action due 4/15/2016
2700	532321	Warren House Apartments	9/16/15	None	N/A
2701	533308	Webb Street	1/13/16	UPCS violation	Corrected
2702	535259	West Gate Apartments	5/21/15	Noncompliance related to Affirmative Marketing requirements; Owner failed to correctly document tenant's annual income recertification (2103)	Corrected
2704	533027	Mountain View Apartments	1/14/16	UPCS violation	Corrective action due 5/11/2016
2709	533302	Robstown Homes	5/19/15	UPCS violation	Corrected
2713	539116	Riverview Apartments	5/13/15	None	N/A
2718	534339	Southwest Village Apartments	1/26/16	Noncompliance related to Affirmative Marketing requirements; UPCS violation	Corrective action due 4/25/2016
2724	536292	Sutton Square Duplexes	6/18/15	UPCS violation	Corrected
2726	533209	Tembell Home	1/14/16	UPCS violation	Corrective action due 5/11/2016

CMTS	HOME	Development	Date of File Review	Description of Noncompliance	Status of Noncompliance
2728	532316	Town Creek Homes	11/1/15	UPCS violation	Corrected
2730	539110	Villa De Reposo (San Luis - Asherton)	11/1/15	UPCS violation	Corrected
2733	536288	Whitney Retirement Village	2/26/15	None	N/A
3372	1001638	Fox Run Apartments	8/12/15	Noncompliance related to Affirmative Marketing requirements	Corrected
3390	542069	Pecan Creek Apartments	2/25/15	Owner failed to correctly document tenant's annual income recertification (422); UPCS violation	Corrected
4001	530200	Dale Meadows	5/18/15	Owner did not properly calculate utility allowance; Noncompliance with lease requirements (§92.253(c) - failure to provide 30 day notice for termination); Failure to provide a Tenant Selection Criteria (§92.253); Owner failed to correctly document tenant's annual income recertification (201)	Some issues uncorrected and the Owner has been referred to the Department's Enforcement Committee
4002	530201	Villa De Reposo - (Encinal)	4/28/15	Owner did not properly calculate utility allowance; Affirmative Marketing requirement; Owner failed to correctly document tenant's annual income recertification (602); Gross rent exceeds limit (600); UPCS violation	Some issues uncorrected and the Owner has been referred to the Department's Enforcement Committee; UPCS corrected
4007	531301	Spring Garden Apartments IV	10/26/15	Affirmative Marketing requirement	Corrected
4202	542076	Bridgeport Estates Phase II	10/26/15	Affirmative Marketing requirement	Corrected
4205	535247A	George Gervin - Garden Apartments	10/1/15	UPCS violation	Corrected

CMTS	HOME	Development	Date of File Review	Description of Noncompliance	Status of Noncompliance
4222	1000639	Cypress Creek at River Bend	5/1/15	UPCS violation	Corrected
4301	1000432	Bel Aire Manor Apartments	1/27/16	Affirmative Marketing requirement	Corrective action due 5/4/2016
4312	1000417	Spring Terrace - Austin	2/18/15	Affirmative Marketing requirement	Corrected
4318	535094	East Elmira at Park Avenue	8/27/15	Owner did not properly calculate utility allowance; Household income increased above 80% at recertification and owner failed to properly determine rent (1); Gross rent exceeds limit (1,2,3); UPCS violation	Some issues uncorrected and the Owner has been referred to the Department's Enforcement Committee; UPCS corrected
4333	1000608	Estates of Bridgeport IVa	10/26/15	Affirmative Marketing requirement	Corrected
4351	1000651	LULAC Amistad Apartments	3/1/15	UPCS violation	Corrected
4395	1000654	Pembroke Court	1/26/16	Affirmative Marketing requirement	Corrective action due 5/31/2016
4402	1000652	Skyline Terrace	2/17/15	Affirmative Marketing requirement	Corrected
4471	1001139	Holland House Apartments	2/27/15	Owner failed to correctly document tenant's annual income recertification (117,126,213,218,221,315,401,425)	Corrected
4498	1001138	Hyatt Manor Apartments	2/1/15	UPCS violation	Corrected
4549	1001003	Chisum Trail Apartments	3/3/15	Noncompliance with lease requirements (§92.253(c) - failure to provide 30 day notice for termination	Corrected
4572	100112	Costa Mariposa	10/22/15	None	N/A

CMTS	HOME	Development	Date of File Review	Description of Noncompliance	Status of Noncompliance
4589	1001074	Huntington	8/26/15	Affirmative Marketing requirement	Corrective action due 6/19/2016
4593	1001075	Park Ridge Apartments	1/27/16	None	N/A
4611	1001134	Courtwood Apartments	11/20/15	Affirmative Marketing requirement	Owner has been referred to the Department's Enforcement Committee
4612	1001135	Hillwood Apartments	11/20/15	Affirmative Marketing requirement	Owner has been referred to the Department's Enforcement Committee
4650	1001128	Horizon Meadows Apartments	1/26/16	None	N/A
4707	1001250	Evergreen at Richardson	3/5/16	Affirmative Marketing requirement	Corrected
4722	1001214	Milam Creek Senior Village II	7/27/15	UPCS violation	Corrected
4724	1001242	Artisan at Port Isabel	2/25/15	Household income above limit upon initial occupancy (7101)	Corrected
4730	1001319	Sulphur Springs Pioneer Crossing for Seniors	5/1/15	UPCS violation	Corrected
4732	1001306	Merritt Lakeside Senior Village	2/1/15	UPCS violation	Corrected
4745	1001244	Oak Creek Townhomes	1/26/16	Affirmative Marketing requirement	Corrective action due 4/25/2016
4761	1001234	Casa Ricardo	4/1/15	UPCS violation	Corrected
4785	1001504	Countrywood Apartments	12/29/15	UPCS violation	Corrected
4802	1001494	Amber Stone Apartments	2/1/15	UPCS violation	Corrected



CMTS	HOME	Development	Date of File Review	Description of Noncompliance	Status of Noncompliance
4803	1001492	The Overlook at Plum Creek	3/31/15	Noncompliance with lease requirements (§92.253(c) - failure to provide 30 day notice for termination	Corrected
4830	2/23/2015	Villas of Giddings	2/23/15	None	N/A
4831	1001540	Riverwood Commons	8/21/15	None	N/A
4832	1001668	Heartland Village Apartments	4/16/15	Affirmative Marketing requirement; UPCS violation	Corrected
4835	1001672	The Reserves at High Plains	5/21/15	Owner did not properly calculate utility allowance; Affirmative Marketing requirement; Owner failed to correctly document tenant's annual income recertification (1-121,4-414)	Corrected
4839	1001674	Inez Tims	5/14/15	Affirmative Marketing requirement	Corrected
4841	1001687	Villa Brazos	3/25/15	None	N/A
4843	1001675	Villas on Independence	8/25/15	UPCS violation	Corrected
4844	1001680	Parkview Place	6/19/15	Owner failed to correctly document tenant's annual income recertification (202,312)	Corrected
4845	1001682	Hacienda del Sol Apartments	8/21/15	Household income above limit upon initial occupancy (10204); UPCS violation	Corrected
4846	1001669	Merritt Legacy	5/11/15	None	N/A
4847	1001676	Sunrise Terrace	8/20/15	UPCS violation	Corrected
4848	1001681	Paseo Pointe	8/20/15	UPCS violation	Corrected
4849	1001686	Highland Villas	6/24/15	None	N/A

CMTS	HOME	Development	Date of File Review	Description of Noncompliance	Status of Noncompliance
4882	1001750	Stonebridge of Kelsey Park	5/20/15	None	N/A
4885	1001759	The Residences of Solms Village	8/28/15	Affirmative Marketing requirement	Owner has been referred to the Department's Enforcement Committee
4887	1001828	Sienna Pointe	5/13/15	UPCS violation	Corrected
4890	1001799	Creek View Apartments III	8/25/15	None	N/A
4910	1002028	Bailey Square	4/23/15	UPCS violation	Corrected
4922	1001715	Chandler Place Apartments	8/25/15	None	N/A
4937	1002047	Oak Ridge Apartments	8/21/15	UPCS violation	Corrected
4949	1002031	Evergreen at Arbor Hills	12/8/15	UPCS violation	Corrected
4968	1002040	La Esperanza Del Rio	1/27/16	UPCS violation	Corrected

# Public Comment Summary and Response

## Attachment 2 – Summary and Reasoned Responses to Public Comment Received

Texas received eight comments from two sources: SafePlace and the Texas Homeless Network (“THN”). Seven comments were related to ESG and one comment was related to HOPWA.

**Comment 1:** SafePlace and THN both support TDHCAs consideration of lengthening the 2017 award period in order to allow ESG Subrecipients to offer a longer period of medium-term rental assistance.

Response: TDHCA acknowledges the comments and will continue to solicit public comment through the 2017 planning process on the possible lengthening of the award period in order to allow ESG Subrecipients to offer a longer period of medium-term rental assistance. No changes have been made to the 2016 CAPER in response to this comment as the proposal noted was specific to 2017.

**Comment 2:** THN commented that the annual ESG goal for Tenant Based Rental Assistance (“TBRA”)/Rapid Re-housing (“RRH”) activities is behind schedule and recommends that TDHCA work with Continuums of Care (“CoCs”) to identify methods of targeting this funding.

Response: As described in CR-05 - Goals and Outcomes, the persons/households expected to be served by each ESG activity has been adjusted because of a change in projection methodology. The performance numbers in Table 1 of CR-05 show that the previous methodology needed adjustments. If the change in methodology was used for the 2015 ESG projections, the performance numbers would be more in line with the expected prior year goals for similarly funded years with the exception of emergency shelter.

In addition, the 2015 ESG Notice of Funding Availability (“NOFA”) had a scoring structure that gave more points to applicants that were serving higher numbers of households with rapid re-housing than applicants that were serving lower numbers of households with rapid re-housing. In this way TDHCA reflects priorities on rapid re-housing and homelessness prevention.

TDHCA will continue to solicit input from the CoCs to effectively administer the ESG program statewide. No changes have been made to the 2016 CAPER in response to this comment.

**Comment 3:** THN recommends that TDHCA consider Rapid Re-Housing as a much needed permanent housing option. Rapid Re-Housing may require more ESG funding than other interventions, but it is proven to be one of the most cost effective solutions to homelessness when all program expenses are considered in cost analyses. THN strongly recommends TDHCA consult with CoCs on the scoring structure for ESG prior to the next competition.

Response: TDHCA does consult with CoCs at least once annually on a variety of topics which have included ESG policy direction and agrees with THN that TDHCA should be sure to consult with CoCs on the overall scoring structure for ESG prior to the next competition. No changes have been made to the 2016 CAPER in response to this comment but TDHCA commits that it will seek out such input as the 2017 ESG Notice of Funding is developed.

**Comment 4:** THN commented that the 100% match requirement is unrealistic for many organizations, especially in rural areas. THN recommends TDHCA consider increasing the amount of and frequency of

match waivers, reduce required match and/or allow CoCs as a whole to provide match for projects in their geographic area.

Response: As federally required by 24 CFR 576.201, ESG recipients must provide 100% match for its ESG grant. TDHCA passes that matching requirement to its ESG Subrecipients. Per 24 CFR 576.201(a)(2), the first \$100,000 of the fiscal year grant is not required to be matched. TDHCA proactively also passes the opportunity for \$100,000 in a match waiver to its Subrecipients during the application process. Since the ESG program began, TDHCA has not received a request for the \$100,000 waiver during the application process and as of this writing no 2016 ESG Applicants have requested the waiver.

TDHCA will continue to offer the \$100,000 match waiver based on the need of the Subrecipient for the waiver. As of this writing, there are no plans to increase the amount of the waiver, since the waiver amount is listed in the federal regulations. TDHCA will consider allowing CoCs to provide match for projects in their geographic areas in the 2017 ESG Application cycle. No changes have been made to the 2016 CAPER in response to this comment.

**Comment 5:** THN recommends that TDHCA encourage a homeless preference among PHAs to align with the U.S. Department of Housing and Urban Development's ("HUD's") "Opening Doors" goals.

Response: While the Consolidated Plan requires that TDHCA work with PHAs per 24 CFR §91.320(j), TDHCA has no jurisdiction over PHAs. Most of TDHCA's ESG interaction with PHAs has to do with TDHCA's Subrecipients working with the PHA residents. At this time there is no authority for TDHCA to encourage PHAs to accept or pursue certain federal preferences over the other local decisions that are made. TDHCA continue to explore opportunities to more work closely with PHAs on goals to address homelessness. No changes have been made to the 2016 CAPER in response to this comment.

**Comment 6:** THN recommends that TDHCA address the obstacle of screening criteria including review of criminal background, income requirements and credit history as these are very significant barriers to affordable housing.

Response: Guidance from HUD was released on April 4, 2016, stating that criminal background should be considered on a case-by-case basis, and that a blanket policy of denying persons housing because of criminal arrest records was discriminatory. In addition, if people are denied access to housing, the landlord/property manager must "be able to prove through reliable evidence that its policy or practice of making housing decisions based on criminal history actually assists in protecting resident safety and/or property." Reviewing criminal records and making the decision for rental applications on a case by case basis is the guidance of the federal government.

TDHCA will continue to follow guidance released from HUD to address barriers to affordable housing. No changes have been made to the 2016 CAPER in response to this comment.

**Comment 7:** In reference to actions taken to reduce the number of poverty level families in CR-35, THN recommends that the Texas Department of State Health Services ("DSHS") consider offering

employment/vocational services as authorized activity if recipients continue to be required to take an employment course.

Response: As indicated in CR-36 Other Actions, HUD requires Housing Opportunities for Persons with AIDS (“HOPWA”) Project Sponsors to take the Getting to Work Training Curriculum. The curriculum covers a range of topics, including the benefits of working while living with HIV, employment resources, and how households can take advantage of the Earned Income Disregard if they are receiving Tenant-Based Rental Assistance (“TBRA”) services. Clients are not required to participate in any employment or vocational services. Per the curriculum, HUD encourages Project Sponsors to refer clients to local workforce centers if part of the household’s individualized plan is to increase earned income. HOPWA is the payer of last resort for any activity. Historically, DSHS has prioritized TBRA; Short-Term Rent, Mortgage, and Utility Assistance (“STRMU”); and Permanent Housing Placement (“PHP”) because DSHS and its our Project Sponsors agree that these are the most important and indispensable HOPWA activities. While HOPWA could pay for employment and vocational services as Supportive Services, workforce centers are better suited and funded for delivering these kinds of services and they should be leveraged. So, the DSHS HOPWA Program limits the use of Supportive Service funds to housing case management, smoke detector provision, and basic telephone services. No changes have been made to the 2016 CAPER in response to this comment.

**Comment 8:** In reference to actions taken to develop institutional structure in CR-35, THN supports CoCs holding local competitions as long as sufficient administrative dollars are made available to allow the CoC to increase staffing capacity to manage the competition.

Response: TDHCA will continue to work with CoCs to hold local competitions and, for the 2016 ESG application cycle, offered a small portion of the total available administrative funds for CoC lead agencies to run the local competition, with a minimum of \$500 in each CoC region. This resulted in a range of \$500 to approximately \$6,900 offered to a CoC to run a local competition. As a result of feedback from the CoC’s that have performed local competitions in the past, TDHCA increased the administrative funds available to run a local competition. For example, when the Coalition for the Homeless of Houston/Harris County ran a local competition in 2015, they received \$1,500. The Coalition for the Homeless of Houston/Harris County is currently running a local competition in 2016 and they will receive \$4,081 in administrative funds for their work. No changes have been made to the 2016 CAPER in response to this comment.

## eCart Data for CR-65



ESG-CAPER-Reporting  
-Tool-TDHCA.xlsm

# Explanations for eCart Data

## TDHCA Ecart-Missing Subrecipient Data:

1. **City of Denton**-This subrecipient has submitted CSF files with the CoC listed as the Organization Name and the Organization ID. The Recipient will continue to work with this subrecipient to correct the data elements. **(DV Partner)**
2. **Friendship of Women**-This subrecipient has submitted CSV files. There are errors which exceed the error threshold for the DV agency. The Recipient will continue to work with this subrecipient to correct their data. **(DV Subrecipient)**
3. **Salvation Army Corpus Christi**-This subrecipient has submitted incomplete data. The Recipient will continue to work with this subrecipient to gather the remaining CSV files.
4. **City of Amarillo**-This agency has submitted one CSV file. . The Recipient will continue to work with this subrecipient to gather the remaining CSV files.
5. **Bridge Over Troubled Waters**-This subrecipient has indicated that it cannot generate CSV files. The Recipient will continue to work with this subrecipient to create the required CSV files. **(DV Subrecipient)**
6. **Alliance Of Community Assistance Ministries**-This subrecipient has submitted CSV files. However identifying information in Question 4a is not populating. The Recipient will continue to work with this subrecipient to correct its CSV files.
7. **Family Abuse Center**-This subrecipient submitted CSV files in the wrong format. The Recipient will continue to work with this subrecipient to correct the CSV files. **(DV Subrecipient)**
8. **Matagorda County Women's Crisis Center**- This subrecipient has indicated that it cannot generate CSV files. The Recipient will continue to work with this subrecipient to create the required CSV files. **(DV Subrecipient)**
9. **City of Beaumont**-This subrecipient submitted CSV files in the wrong format and is missing data from multiple partners. The Recipient will continue to work with this subrecipient to correct the CSV files. **(DV Partner)**