



**CONSOLIDATED ANNUAL
PERFORMANCE EVALUATION
REVIEW
PROGRAM YEAR-18**

EXECUTIVE SUMMARY
CITY OF NEW BRAUNFELS, TEXAS
CONSOLIDATED ANNUAL PERFORMANCE AND EVALUATION REPORT
PROGRAM YEAR 18

The City of New Braunfels received \$378,454 in Community Development Block Grant (CDBG) funds for the Program Year 2018 (PY18) from the U.S. Department of Housing & Urban Development (HUD). CDBG funds were allocated to public service activities, public facilities, housing activities and administration. In addition to the PY18 grant, unallocated funds from previous program years of \$149,975 was also available for projects.

Projects and activities funded with CDBG funds must meet one of the following three National Objectives to be eligible for funding: (1) benefit low-moderate income persons; (2) prevent slum and blight; or (3) meet an urgent community need per HUD's definition.

The City obligated 20% (\$75,690) of the total allocation for PY18 to Program Administration and 15% (\$56,768) to Public Services. These amounts are capped at these percentages by federal regulations and based on the current program year grant. The remaining \$245,995 funds were allocated to housing and public facility improvements.

Funded Projects for PY18 were:

- Public Services
 - CASA of Central Texas - \$18,000
 - San Antonio Food Bank - \$8,000
 - Comal County Senior Citizens Foundation – Meals on Wheels - \$20,651
 - The Salvation Army - \$10,117
- Housing
 - Comal County Habitat for Humanity - \$8,500
 - Comal County Senior Citizens Foundation – Minor Home Repairs - \$100,000
- Public Facilities and Parks Improvements
 - Westside Community Center – HVAC Replacement - \$64,400
 - Westside Community Center – Improvement for 2nd Floor Fire Exits - \$88,100

Using CDBG funding, a total of 572 unduplicated low-moderate income residents of New Braunfels benefitted from a public service activity; ten low-income elderly homeowners received minor home repairs and accessibility improvements to their homes; and one first time low-moderate income homebuyer received closing cost assistance.

Information Contained in PY18 CAPER

The PY18 CAPER includes the following components:

- Detailed information on how CDBG funds were expended toward local priorities;
- Charts outlining the number and types of persons assisted including race, ethnicity and income levels;
- Other pertinent and required information regarding the status of CDBG funded projects administered by the City of New Braunfels.

DRAFT

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 City of New Braunfels 5-Year Consolidated Plan identified housing and community development needs and resources to develop a plan for meeting those needs. The Consolidated Plan consists of a 5 year Plan, a Strategic Plan and Annual Action Plan. The Program Year 18 Action Plan described the specific projects and activities that the City undertook during the Program Year.

The Consolidated Annual Performance and Evaluation Report (CAPER) is an assessment of the City's performance in meeting the objectives and goals established in the City's 5-Year Consolidated Plan and Annual Action Plan.

The PY18 activities addressed some of the priorities listed in the 2015-2019 Consolidated Plan. These activities reflected the policies and programs that will best meet the needs within the city, and are listed as follows:

- Public Services
- Decrease Homelessness
- Increase Affordable Housing
- Public Facility and Infrastructure Improvements
- Fair Housing

The City continued to develop innovative ways to solicit public input and held neighborhood meetings and public hearings at various locations in the City. This provided an opportunity for residents who might not be comfortable speaking at a public hearing during a City Council meeting to voice their opinions and concerns about housing and community issues. A Stakeholders meeting was held in April 2018 to solicit input from housing and service providers. The Community Development Advisory Committee (CDAC) reviewed applications for funding, held public forum for applicants and recommended funding to the City Council.

Over the past program year, the City of New Braunfels pursued the goals and objectives outlined in the PY 2018 Annual Action Plan and the PY 2015-2019 Consolidated Plan. This year the City of New Braunfels invested Community Development Block Grant (CDBG) funds to provide:

- Minor home repairs and accessibility improvements for 10 low-income elderly homeowners through the Comal County Senior Citizens Foundation Minor Home Repair program
- Closing cost assistance for one first-time homebuyer through the Comal County Habitat for Humanity

- Supportive services to low-moderate income residents of New Braunfels by CASA, the San Antonio Food Bank, the Salvation Army, Comal County Senior Citizens Foundation Meal on Wheels program.
- Improvements to Westside Community Center, a city-owned facility: replacement of HVAC system and expansion of 2nd floor fire exits to provide better emergency egress for mobility impaired visitors and staff.

DRAFT

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
Affirmatively Further Fair Housing	Program Administration	CDBG: \$	Other	Other	500	350	70.00%	50	47	94.00%
Community and Economic Development	Non-Housing Community Development	CDBG: \$	Facade treatment/business building rehabilitation	Business	10	0	0.00%	0	0	100.00%
Community and Economic Development	Non-Housing Community Development	CDBG: \$	Jobs created/retained	Jobs	10	0	0.00%	0	0	100.00%
Community and Economic Development	Non-Housing Community Development	CDBG: \$	Businesses assisted	Businesses Assisted	10	0	0.00%	0	0	100.00%
Decrease Homelessness	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	100	0	0.00%	0	0	100.00%

Decrease Homelessness	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	50	30	60.00%	13	11	84.62%
Decrease Homelessness	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Homeless Person Overnight Shelter	Persons Assisted	100	0	0.00%	0	0	100.00%
Decrease Homelessness	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	25	0	0.00%	0	0	100.00%

Decrease Homelessness	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Homelessness Prevention	Persons Assisted	100	257	257.00%	0	0	100.00%
Decrease Homelessness	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Housing for Homeless added	Household Housing Unit	25	0	0.00%	0	0	100.00%
Historic Preservation	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	100	0	0.00%	0	0	100.00%
Historic Preservation	Non-Housing Community Development	CDBG: \$	Buildings Demolished	Buildings	10	0	0.00%	0	0	100.00%
Historic Preservation	Non-Housing Community Development	CDBG: \$	Housing Code Enforcement/Foreclosed Property Care	Household Housing Unit	10	0	0.00%	0	0	100.00%

Increase Affordable Housing	Affordable Housing	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	50	257	257.00%	0	0	100.00%
Increase Affordable Housing	Affordable Housing	CDBG: \$	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	50	0	0.00%	0	0	100.00%
Increase Affordable Housing	Affordable Housing	CDBG: \$	Homeowner Housing Added	Household Housing Unit	0	0	0.00%	0	0	100.00%
Increase Affordable Housing	Affordable Housing	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	50	30	60.00%	13	11	84.62%
Increase Affordable Housing	Affordable Housing	CDBG: \$	Direct Financial Assistance to Homebuyers	Households Assisted	50	12	24.00%	8	1	12.50%
Increase Affordable Housing	Affordable Housing	CDBG: \$	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	20	0	0.00%	0	0	100.00%
Increase Affordable Housing	Affordable Housing	CDBG: \$	Homelessness Prevention	Persons Assisted	100	257	257.00%	0	0	100.00%
Increase Affordable Housing	Affordable Housing	CDBG: \$	Housing for Homeless added	Household Housing Unit	20	0	0.00%	0	0	100.00%

Public Facility and Infrastructure Improvements	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1000	7451	745.10%	630	630	100.00%
Public Facility and Infrastructure Improvements	Non-Housing Community Development	CDBG: \$	Homeless Person Overnight Shelter	Persons Assisted	0	664	664.00%	0	0	100.00%
Public Facility and Infrastructure Improvements	Non-Housing Community Development	CDBG: \$	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	0	0	0.00%	0	0	100.00%
Public Facility and Infrastructure Improvements	Non-Housing Community Development	CDBG: \$	Buildings Demolished	Buildings	10	0	0.00%	0	0	100.00%
Public Facility and Infrastructure Improvements	Non-Housing Community Development	CDBG: \$	Housing Code Enforcement/Foreclosed Property Care	Household Housing Unit	10	0	0.00%	0	0	100.00%
Public Services	Public Services	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1000	2566	456.50%	495	572	115.56%
Public Services	Public Services	CDBG: \$	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	50	0	0.00%	0	0	100.00%
Public Services	Public Services	CDBG: \$	Homeless Person Overnight Shelter	Persons Assisted	0	664	664.00%	0	0	100.00%

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.

There are a number of unmet goals from the current Consolidated Plan. In the current Consolidated Plan there were goals and outputs included for activities that the City did not have sufficient funding or capacity to undertake. During the upcoming Consolidated Plan process, the City will develop goals only for activities and projects that are feasible for a 5-year plan based on the estimated amount of CDBG funding the City will receive during the next five years.

Priorities that were met during the 2018 Program Year were the funding of supportive services for low-moderate income residents; minor home repairs and accessibility improvements that allowed elderly homeowners to “age in place” and improved their living conditions; and improved recreational and educational facility.

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
White	511
Black or African American	34
Asian	1
American Indian or American Native	
Native Hawaiian or Other Pacific Islander	
Total	546
Hispanic	281
Not Hispanic	291

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

Narrative

During the 2018 program year, funded agencies were required to submit monthly performance and beneficiary reports. Information on the racial and ethnic status of the individual, families or households assisted was entered into IDIS.

The above chart does not accurately reflect the number of beneficiaries for PY18. The total beneficiaries is 572. The table above does not include: one Asian/White; 10 Black/African American & White; and 15 Multi-Racial beneficiaries. The number of Hispanic beneficiaries and Non-Hispanic beneficiaries is correct.

The PR23 does not accurately reflect the number of beneficiaries of housing and public services during PY18 since it includes beneficiaries that were previously counted in PY17's CAPER.

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	\$528,429.79	\$405,786.29

Table 3 - Resources Made Available

Narrative

The PY18 Action Plan was developed based on committing the entitlement grant of \$378,454 for available programs. An additional amount of \$149,975.79 reflect funds from current program year that were unallocated and previous program years that were either unallocated or recaptured and available to commit to new projects. At the end of PY18, there were several subrecipients that had additional reimbursement requests for September that were submitted in October and are not reflected in the total amount expended during the program year. Total expenditures during PY18 were \$405,786.29.

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
City Wide	100	100	Low Mod Limited Clientele; Low Mod Area

Table 4 – Identify the geographic distribution and location of investments

Narrative

Public Service activities were conducted city-wide. The area covered by this CAPER is the City of New Braunfels, Texas. New Braunfels is located in Comal and Guadalupe Counties. There are areas within New Braunfels that are designated as eligible for CDBG funding based on the percentage of low-moderate income residents. These areas are occupied by at least 49.63 percent low-moderate income residents. New Braunfels has an exception percentage ratio.

Activities funded that were based on serving Low-Moderate Income persons were made available to eligible participants on a city-wide basis. All activities were designed to directly assist low-moderate income households and/or limited clientele beneficiaries. The Minor Home Repair program and Homebuyers Assistance Program are city wide projects designed to assist low-moderate income homeowners and homebuyers. The income guidelines set for activities ensure that all participants are low-moderate income. The Westside Community Center, a city-owned property, projects were determined by census information and are located in low-moderate income areas.

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.

Although CDBG requires no match, subrecipients of CDBG funding from the City of New Braunfels were expected to leverage the CDBG funds with other private, state or local funds. This information is built into applications for CDBG funding to ensure that the City's contribution to the project is proportional to the number of New Braunfels residents served. This information is also taken into consideration when funding recommendations are made by the Community Development Advisory Committee to City Council.

- The City used CDBG funds to improve public facilities that are city owned and located in low-moderate income areas. The two projects at Westside Community Center, a city facility, for PY18 were the installation of a new HVAC system to replace the inefficient and inadequate air conditioning system. The fire exits on the 2nd floor were expanded to provide better emergency egress for mobility impaired visitors and staff.

R-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	0	0
Number of Non-Homeless households to be provided affordable housing units	8	1
Number of Special-Needs households to be provided affordable housing units	13	10
Total	21	11

Table 5 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	0	0
Number of households supported through The Production of New Units	8	1
Number of households supported through Rehab of Existing Units	13	10
Number of households supported through Acquisition of Existing Units	0	0
Total	21	11

Table 6 – Number of Households Supported

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

The City maintained a strong commitment to preserving the existing supply of affordable housing, as well as increasing the availability of affordable housing opportunities through funding minor repair and homeownership programs. During PY18, the Comal County Senior Citizens Foundation's Minor Home Repair program fell short of their goal of 13 projects. This was due to mainly to a lack of eligible applicants for the program and a later than planned start date for projects. The staff worked diligently to provide

outreach and information to senior groups in order to solicit applications and has increased their outreach program in order to meet goals in future CDBG projects.

Comal County Habitat for Humanity proposed to provide closing cost assistance to eight new homebuyers. Due to the inability to locate affordable lots on which to build and weather delays, the agency fell short of its goal and assisted one homebuyer with closing costs.

Discuss how these outcomes will impact future annual action plans.

Based on past experiences and the impact that projects can have on timeliness requirements, the City will fund public facility projects that are “shovel ready”. The City will work with the Comal County Senior Citizens Foundation to review their policies and procedures and outreach plans for the upcoming program year and with Comal County Habitat for Humanity to identify affordable lots for their home builds. Failure to meet contractual goals is a factor in determining future CDBG funding. The CDBG application for subrecipients has been revised to include a detailed timeline for all projects.

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.

Number of Households Served	CDBG Actual	HOME Actual
Extremely Low-income	507	0
Low-income	55	0
Moderate-income – Below 80%	10	0
Total	572	0

Table 7 – Number of Households Served

Narrative Information

The City of New Braunfels is committed to utilizing CDBG funds to assist low-moderate income residents. During PY18 and subsequent past program years, 100% of CDBG funds have benefited low-moderate income residents.

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:

During PY18, the Comal County Homeless Coalition met monthly to discuss issues and challenges in meeting the needs of those experiencing homelessness or at-risk of homelessness. Members of the Coalition represent service and housing providers, public housing staff, emergency services such as The Salvation Army, the McKenna Foundation, special needs populations and City government. City staff from the Police Department, the Westside Community Center and the CDBG program participated in the Coalition's planning process. The Comal County Homeless Coalition is part of the Texas Balance of State Continuum of Care and is managed by the Texas Homeless Network (THN), a statewide nonprofit agency.

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

The Comal County Homeless Coalition conducted a Point-In-Time in January 2019 in an effort to identify the number of persons experiencing homelessness in Comal County. Efforts were directed at locating people who were unsheltered. The PIT count identified 65 adults, 20 children, five young adults (ages 18-24) and seven chronically homeless individuals. Of those surveyed 15 reported having a serious mental illness, eight with substance use disorders, one with HIV/AIDS and nine who were survivors of domestic violence.

The City held a stakeholder meeting to discuss and identify priorities for those experiencing homelessness. The Comal County Homeless Coalition worked to find way to provide more intensive outreach to those experiencing homelessness. There are no agencies in New Braunfels that provide only outreach activities, however, any agencies provide outreach to the specific population that they serve. The City uses CDBG funds to support these agencies. These agencies include but are not limited to the Comal County Crisis Center, Family Promise, Family Life Center, San Antonio Food Bank, Comal County Senior Citizens Foundation, the Salvation Army, CASA and Habitat for Humanity.

The Salvation Army regularly conducted outreach activities and offered programs that provided meals and other supplies for families that are experiencing homeless and those who are at risk of homelessness. Participants were assessed to determine their individual needs and were referred to appropriate services. The San Antonio Food Bank – New Braunfels location- has mobile vans that regularly distributed food in low income neighborhoods and at various agencies in the community as well as at New Braunfels Food Bank.

New Braunfels & Comal County ISDs have Homeless Liaisons that assisted homeless and at risk homeless students and worked closely with the appropriate agencies to secure services. The Homeless Liaison:

- Verified and tracked students; coordinated services for homeless students

- Worked with campuses to make sure students were receiving academic support
- Coordinated with transportation and food services to ensure transportation and breakfast/lunch for students
- Provided supplies and materials: school supplies and emergency clothes
- Assisted agencies such as the Comal County Crisis Center, Family Promise and CASA with school enrollment for children receiving services or residing in emergency shelter

Addressing the emergency shelter and transitional housing needs of homeless persons

Three agencies provided emergency shelters for specific homeless populations in New Braunfels. The Comal County Crisis Center operated an emergency shelter for victims of domestic violence and sexual assault and their children. Connections provided emergency shelter and transitional housing for youth aging out of foster care and unaccompanied homeless youth. Family Promise provide emergency shelter to families experiencing homelessness. All agencies have received CDBG funding in previous years.

In regard to an emergency shelter, through extensive coordination amongst the agencies, members of the Comal County Homeless Coalition opened and supported the City's first Cold Weather shelter for homeless residents when temperatures dropped below freezing for several days this past winter. A task force was created within the Coalition to further develop processes and procedures for the Cold Weather shelter and also to research other shelter opportunities offered by similar-sized cities.

Transitional housing, Rapid Re-Housing and permanent supportive housing are recognized as an unmet need in New Braunfels. NB Housing Partners is developing a transitional housing project in New Braunfels. The 43-unit complex will provide housing and services for individuals and families exiting from emergency shelters or other service programs. The City of New Braunfels provided funding (non-CDBG) for the purchase of the land for this project.

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

As part of the Continuum of Care planning with the Comal County Homeless Coalition, the City worked with service and housing providers to identify mechanisms that prevent discharge from public institutions into homelessness. This has proven to be a difficult task since there are no emergency shelters for the general population and no transitional/Rapid Re-Housing programs in the City.

The San Antonio Food Bank, which maintains a facility in New Braunfels received CDBG funding for emergency food distribution. The Comal County Senior Center's Minor Home Repair program was funded

with CDBG funds assisted low-moderate income elderly homeowners with repairs including accessibility improvements so that they can “age in place” and remain safely in their homes.

Other efforts to prevent homelessness, included the continued funding of public services that provide assistance to low-income persons/households to improve their abilities for self-sufficiency; and providing on-going technical assistance to local service providers to increase organizational capacity and ability to provide effective services.

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

There are few community resources specifically for chronically homeless, individuals and families, families with children, veterans and their families, and unaccompanied youth to make the transition to permanent housing and independent living. Supportive services were available but without affordable housing options the transition to permanent housing and independent living continued to be an obstacle to housing stability.

During PY18 and previous program years, the City has allocated CDBG funding to agencies that provide services and housing to the homeless populations including Family Promise (emergency shelter for families); Comal County Crisis Center (DV shelter); San Antonio Food Bank; The Salvation Army; and Connections (emergency shelter for homeless and runaway youth). Local faith-based organizations also provide specific assistance to those in need as they are able. The lack of resources for homeless housing and services is an unmet need in New Braunfels.

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

Introduction

The public housing organization for the City is the New Braunfels Housing Authority. The Housing Authority has 170 public housing units in New Braunfels that are owned by the Housing Authority. The Housing Authority also owns one high-rise elderly/disabled complex with 100 units and 35 duplexes for larger families. The Housing Authority provides 293 vouchers through the Housing Choice Voucher program. The extent of generational poverty in local public housing is not clear. The City will work with the housing authority to determine if generational poverty is indeed a problem and identify strategies to reduce generational poverty.

Actions taken to address the needs of public housing

The Housing Authority went through a period of change during the year with the Executive Director retiring and the process of selecting a new Executive Director. City staff met with the Interim Executive Director of the Housing Authority during the program year to discuss affordable housing issues and the needs of public housing residents. There is a consensus that the City needs to develop more affordable housing both rental and homeownership but is limited by funding levels and capacity. The Housing Choice Voucher participants have a difficult time locating rental housing that is at or below the FMR. The City did not conduct any CDBG funded activities with the New Braunfels Housing Authority during PY18.

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

New Braunfels Housing Authority encouraged the residents to be more involved in Resident Council meetings by providing the residents the opportunity to learn about the activities, security, modernization projects and management issues and provide input and feedback. The New Braunfels Housing Authority is finalizing the appointment of a new Executive Director. When appointed, City staff will meet with the new Executive Director to discuss upcoming changes and plans for public housing residents and properties. The City plans to have regular meetings and work more closely with the housing authority as the City further develops their Workforce Housing efforts.

The City will continue to support efforts to coordinate the work of social service organizations that provide services, housing assistance and homeownership opportunities to public housing residents. Comal County Habitat for Humanity held regular information sessions and application assistance for public housing residents for the agency's homeownership program. The City has supported Habitat's efforts by providing CDBG closing costs assistance for the past five years. Habitat received \$8,500 from CDBG for closing costs assistance during PY18.

Actions taken to provide assistance to troubled PHAs

The New Braunfels Housing Authority is not designated as a troubled PHA.

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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 City supports the development of affordable housing and has reviewed its policies affecting housing development, building codes and zoning ordinances. The City did not identify any policies that negatively affected affordable housing development. The Workforce Housing Advisory Committee has been meeting to identify priorities, housing needs, obstacles to affordable housing development and is working to develop a plan for increasing the stock of affordable housing. The primary obstacle is the cost of land which increases the price of the house and makes it unaffordable for low-moderate income households.

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

The City of New Braunfels strived to meet the needs of all underserved citizens. The primary obstacle was a lack of resources. There are not enough available resources to address all of the needs within the City of New Braunfels. To fill this gap between need and resources, the City continually sought collaborative projects with other entities and other sources of funding, including the City's general funds, grants, and in-kind contributions. The City made every effort to assist local social service agencies in securing additional funds for community needs as opportunities become available. The City's Grant Coordinator actively sought funding opportunities in order to stretch limited general fund and CDBG dollars.

The City will continue to monitor its policies regarding code enforcement, development costs and housing inspections to ensure equal access for underserved residents. Another primary obstacle was a lack of agencies with the capacity to develop and manage affordable housing projects. There are no Community Housing Development Organizations (CHDOs) or Community Development Corporations (CDCs) in the City of New Braunfels. During PY18, the City continued to work with the Comal County Habitat for Humanity to assist low-income homebuyers obtain housing. The City researched developing a downpayment assistance program but with the high cost of housing in the City, there were very few affordable units on the market and this does not seem like a viable program at this time.

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

The City distributed and maintained documentation of required information for homes built before 1978, including the EPA Lead-based Pamphlet, Notification of Lead Hazard Evaluation, and Notification of Lead Hazard Reduction. In PY18, the City funded a minor home repair through a subrecipient agency. Lead-based paint information is included in the application package and agency staff discusses lead-based paint

issues with the applicants.

The Minor Home Repair program managed by the Comal County Senior Citizen Foundation provided repairs to 10 elderly homeowners (age 62 and older). No children under the age of six resided in or were expected to reside in the ten homes that received repairs during PY18. The agency did provide a Lead-Based Paint Hazards brochure to all applicants and maintained a signed certification that the applicant received in the information in the client file. If a household has children under the age of 6, the Comal County Senior Citizen Foundation, in collaboration with the City, will conduct a lead-based paint inspection and decide on a case-by-case basis if the lead-based paint issues can be addressed and repairs completed within the funding limits established by the program guidelines.

During PY18, the City realized that more could be done to address lead-based paint issues and has formulated a plan that will be implemented in PY19. The City will coordinate with Comal County Health Department to review addresses of proposed housing projects to determine if the location is a housing unit in which children have been previously identified as lead-poisoned. Additionally, the City will require lead-testing from qualified lead inspectors for proposed housing projects for housing built prior to 1978 in which the household includes children aged 6 or under. Positive test results will be reported by City to Comal County Health Department so that the County may then initiate their lead-testing protocol.

As applicable, a lead hazard remediation plan must be included with the scope of work that is submitted to the City by the CDBG-funded subrecipient prior to project approval. A notice to proceed will not be issued by City until a qualified lead inspector verifies that the identified lead hazard has been abated.

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

Using the priorities listed in the 2015-2019 Consolidated Plan as a guide, New Braunfels used CDBG funds in an attempt to target the primary causes of poverty, which is limited access to quality housing, lack of affordable housing both rental and homeownership and lack of public services including services to the homeless.

Action taken during PY18 were:

- Comal County Senior Citizens Foundation - Meals on Wheels provided 105 elderly residents with a hot nutritious meal Monday through Friday. Food for the week-end is also delivered with the Friday meal.
- San Antonio Food Bank provided emergency food assistance to 129 New Braunfels residents as well as providing a mobile pantry at the Westside Community Center and the New Braunfels Housing Authority.
- Habitat for Humanity was funded to provide closing cost assistance to one homebuyer.
- CASA provided advocacy and case management services to 162 abused and/or neglected children.
- The Salvation Army provided meals and services to 155 New Braunfels residents that were experiencing homelessness or at risk of homelessness.

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

During PY18, the City continued to make entitlement funds available to the community through an open application process and issuance of subrecipient agreements. The City provided subrecipient training during the application phase, prior to the execution of Subrecipient Agreements, conducted monitorings and was available for technical assistance. The City maintained its webpage with up-to-date information as a resource for other city departments, general public and service/housing providers. The City participated in the local homeless coalition meetings and conducted an annual Stakeholders meeting to solicit input from service and housing providers on the issues their clients were experiencing identifying gaps in service and to prioritize needs. The City maintains open communication with the Housing Authority and local agencies providing housing and services to low-moderate income people and households.

The City's Grants Coordinator worked closely with other City departments and local agencies to assist in the development of a strong institutional structure for effective program delivery. Staff provided expertise, technical assistance and documentation of need to the general-fund departments of the City, such as the Parks, Planning and Development and the Library. Staff also developed, operated, and monitored the programs with the coordination of various City departments such as Finance, Purchasing, City Secretary, Legal, Parks Departments and the City Manager's office. By working with other City departments, staff minimized the potential gaps in institutional structure that can hinder program success.

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

Implementation of the PY18 Annual Action Plan involved a variety of agencies and City departments. Collaboration and coordination between agencies is important to ensuring that the needs in the community are addressed. The City held a Stakeholders meeting in April 2018 to solicit input on housing and service needs for the Annual Action Plan and to discuss fair housing issues during PY18. The key agencies involved are listed below:

- Community Development Advisory Committee – a nine member volunteer committee of New Braunfels residents that are appointed by City Council and serve three-year terms. CDAC provides guidance and input on CDBG programs and makes funding recommendations to City Council
- McKenna Foundation – local community foundation
- New Braunfels Housing Authority – public housing and Housing Choice vouchers
- CASA – advocacy for abused and neglected children
- Comal County Habitat for Humanity – homeownership programs
- Comal County Senior Citizens Foundation – recreational and educational programs for senior citizens and a minor home repair program aimed at providing the repairs and accessibility improvements in an effort to allow homeowners to “age in place”
- Family Life Center – emergency rent and utility assistance

- Comal County Crisis Center – emergency shelter and services for victims of domestic violence and sexual assault
- STEPS – self-sufficiency program
- San Antonio Food Bank – New Braunfels Facility – emergency food distribution and educational/nutrition programs
- Connections – emergency shelter for homeless and runaway youth
- The Salvation Army – Crisis and emergency services, meal program and supportive services for people experiencing homelessness and low income residents
- New Braunfels & Comal County ISDs – homeless liaisons and services for students who are experiencing homelessness or at-risk of homelessness.
- Hill Country MHDD – mental health services
- Big Brothers-Big Sisters – educational and recreational opportunities for low income and at-risk children and youth

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

The City updated the 2013 Analysis of Impediments to Fair Housing Choice during PY16 and has begun to implement some of the actions listed in the plan. Citizen input on Fair Housing issues was solicited from residents at public hearings, meetings and an on-line survey in English and Spanish. During PY18 information on Fair Housing was distributed using the City’s website. The Fair Housing hotline number is also posted on the City’s website and the City has a designated Fair Housing Officer.

Impediment 1: Lack of Fair Housing Awareness

- All CDBG meetings included a discussion of fair housing information. The Pre-Application CDBG and Subrecipient workshops discussed fair housing. The City issued a proclamation that April is Fair Housing month and posted fair housing information on its website.

Impediment 2: Lack of Transportation Options

- The City recognized the need for further public transportation and developed a feasibility study for fixed route public transit service
- No actions were taken during PY18 with CDBG funding.

Impediment 3: Lack of Affordable Housing

- The City formed the Workforce Housing Advisory Committee to identify barriers to affordable housing and potential solutions.
- The City funded Habitat for Humanity with CDBG funds to assist one low-income homebuyer with 100% of their closing costs.
- The City funded the Comal County Senior Citizens Foundation Minor Home Repair program with

CDBG funds. The program provided needed repairs and accessibility improvements to 10 low-moderate households in an effort to maintain the housing stock and to allow elderly homeowners to safely “age in place”.

Impediment 4: Lack of Accessible Housing Units

- The City funded the Senior Citizens Foundation’s Minor Home Repair Program that provides accessibility improvements to low-income elderly homeowners in New Braunfels. Accessibility improvements were part of the Scope of Work for all 10 projects.

Impediment 5: Lack of Financial Independence and Job Opportunities

- This impediment was identified by the updated Analysis of Impediments to Fair Housing during the summer 2017. The City did not take any actions during PY18.

Impediment 6: Lack of Amenities in Low-Moderate Income Neighborhoods

- During PY18, CDBG funds were used to provide improvements to Westside Community Center, a city-owned facility, located in a low-moderate income area of the city.

The City has a Fair Housing Ordinance and a Fair Housing Officer who is responsible for providing educational materials and information on fair housing; receiving fair housing complaints; assisting complainants in filing documentation with HUD; reviewing City policies to ensure there is no violation to the Fair Housing Act or related Acts; and maintaining a log of all fair housing activities, inquiries and complaints with the outcomes.

No fair housing complaints were received by the City during PY18.

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

City staff monitored each subrecipient of CDBG funds for compliance with CDBG rules and regulations. Each subrecipient executed a Subrecipient Contract with the City that set out HUD rules and regulations, performance objectives, long-term compliance requirements and the CDBG grant amount.

The City developed standardized monitoring forms that were due on a monthly basis and reviewed by staff to determine if the subrecipient was on track to meet contractual goals. These forms provide beneficiary data; project progress reports. City staff was in contact with the subrecipients on a regular basis and available for technical assistance if requested or if the need was identified during a monitoring visit.

As a result of a programmatic and financial monitoring by HUD in June 2017, the City revised subrecipient monitoring requirements and forms to ensure compliance with recommendations made to the City as a result of the City's monitoring review. The City's Financial Policies were also revised to meet the requirements in 2 CFR 200.

All subrecipients received at least one on-site monitoring visit during PY18. For new or poorly performing subrecipients, monitoring were more frequent. The subrecipients were notified via letter and provided with a list of items that will be reviewed.

The letter included information that City staff would need to see, as well as any particular staff person that needed to be available to answer questions. If there were any findings during the monitoring visit, these were included in a letter to the subrecipient, with an expected outcome and time frame to correct all monitoring findings or concerns.

The City offered one-on-one technical assistance and group meeting/training sessions for the subrecipients during the year.

The City also monitored its own performance to ensure it is meeting the goals and objectives as set forth in the Consolidated Plan. Program and subrecipient files were reviewed quarterly to ensure that the information was accurate and current. This information was transferred into the IDIS system that allows HUD to track the City's performance as well.

The City continued to seek and encourage participation of small, minority, and/or women owned businesses in the expenditure of its CDBG grant. The City's Purchasing Department maintains a list of minority and women owned businesses. Subrecipient agencies have a Section 3 clause in their contracts with the City. Section 3 requirements were discussed in application workshops and at the contract signing. Subrecipients were required to track this information and submit a Section 3 report for

employees and contractors or vendors involved in CDBG projects. The City provided the list of minority and woman-owned businesses to the subrecipients when bids are required for a CDBG project. Currently, there are no Section 3 contractors in the City.

All projects that receive CDBG funding were priorities in the Consolidated Plan. This information was provided to applicants at the CDBG workshop. Applications were reviewed by City staff and the Community Development Advisory Committee to ensure that the project met a priority and was eligible for CDBG funding.

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.

In accordance with HUD regulations and the City's Citizen Participation Plan, the notice of the 15-day comment period and the public hearing were published in the local newspaper, and on the City's website. The notice was published in both English and Spanish. The public hearing was held at New Braunfels City Hall, City Council Chambers, 550 Landa Street which is an accessible building. Certified interpreters in Spanish and German, sign language and any additional accessibility needs were available upon request. Copies of the draft CAPER were available at City Hall, the main branch of the Library and on the website. It was noted in the public notice that written and verbal comments received during the public comment period would be summarized and included in the final document for submission to the U.S. Department of Housing and Urban Development.

The City's comment period for the CAPER was from November 18, 2019 through December 2, 2019. The public hearing was held at New Braunfels City Hall at a regularly scheduled City Council meeting on November 25, 2019 beginning at 6:00 PM. Citizens were encouraged to provide verbal or written comments and a City staff member was designated and contact information was provided in the Public Notice. **City Council approved the CAPER at the City Council meeting held on December 9, 2019.**

No written or verbal comments were received.

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.

There were no changes to the City's program objectives during PY18. However due to past issues of timeliness, the City of New Braunfels now evaluates project readiness, past performance with CDBG funds and agency/department capacity prior to committing CDBG funds for a project or activity.

The City does not have an existing Section 108 loan.

Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?

The City of New Braunfels does not have any open Brownfields Economic Development Initiative grants.

[BEDI grantees] Describe accomplishments and program outcomes during the last year.

Not Applicable

DRAFT