



Texas Department of Housing and Community Affairs

Summary of CDBG-CV Second Amendment to the 2019 State of Texas Consolidated Plan One Year Action Plan

December 2020 / January 2021

The Governor of the State of Texas has designated the Texas Department of Housing and Community Affairs (TDHCA) to receive all allocations of CDBG-CV funds under the CARES Act. It's three allocations are \$40,000,886, \$63,546,200 and \$38,299,172 respectively for a total of \$141,846,258.

In November 2020, HUD approved the Department's Substantial Amendment to its One Year Action Plan reflecting the programming of all allocations of the CDBG-CV funds with a primary focus on rental assistance. Signed by the President on December 27, 2020, an additional and significant federal resource, the Coronavirus Relief Bill (tied to H.R. 133, The Consolidated Appropriations Act, 2021) is dedicated specifically to rental assistance.

The availability of the rental assistance resource through the Coronavirus Relief Bill provides an estimated \$1.9 billion for Texans and provides a widely needed dedicated source for rental assistance. In light of that new dedicated resource, TDHCA has reconsidered the highest and best use of the flexible CDBG-CV funds. The new Relief Bill funds being released contemporaneously with the previously planned CDBG-CV rental assistance funds, will inadvertently create competition between the programs as tenants and landlords seek out the program that can assist them the most; will create significant confusion among tenants, landlords, referral systems, and subrecipients; and will create a heightened risk of benefits being duplicated, a federal ineligible use of funds.

Therefore, TDHCA is proposing a second amendment to its 2019 State of Texas Consolidated Plan One-Year Action Plan specifically focused on using the CDBG-CV for rental assistance only for short-term coverage in the entitlement communities of Texas who were expecting CDBG-CV contracts as of January 15, 2021. This gap resource, estimated at approximately \$37.4 million, will be available for obligation by entitlement communities until July 31, 2021. All other funds previously identified as rental assistance in the initial Plan amendment will be used to provide payment assistance for households facing mortgage arrears and challenges in paying their mortgages due to the pandemic's economic impact on their household. This second amendment action being released for public comment is subject to rescission or amendment any time prior to its final submission to HUD.

As required by the CDBG-CV notice, TDHCA will allocate \$40,000,886 (the amount of its first allocation) to non-entitlement units of general local government (UGLG). Non-entitlement units are cities with populations of less than 50,000 (except cities that are designated principal cities of Metropolitan Statistical Areas), and counties with populations of less than 200,000.

All CDBG-CV allocations will be used for the following activities to prevent, prepare for, or respond to the coronavirus. Depending on the ease of implementation of these activities and the demand at the time the services are provided, TDHCA may redirect funds from one activity to another, without submitting an

additional substantial amendment, to expedite the delivery of assistance in these urgent times for up to 25% of the budgeted activities. However, the \$40,000,886 in Urgent Need Mortgage Assistance allocated competitively to non-entitlement cities and counties will remain with non-entitlement cities and counties, but may be relocated among awardees if the funds are not timely expended.

As previously stated, the Executive Director or designee may reallocate funds among these activities up to a 25% change without further amendment to this plan.

Uses for CDBG-CV Funds

CDBG-CV Program Activity	Recommended Allocation
1. Urgent Need Rental/Mortgage Assistance A. Approximately \$37.4 million allocated to entitlement cities and counties already operating COVID rental assistance programs for a rental assistance activity until COVID Relief Act funds are able to be released. A commitment of at least 10% of all RA is required to be available for eviction diversion. B. Competitive Allocation for Urgent Need Mortgage Payment Assistance (\$68,517,020) <ul style="list-style-type: none"> • \$40,000,886 to be allocated to benefit non-entitlement cities and counties • \$28,516,134 to be allocated competitively to entitlement cities and counties, nonprofits and regional providers for Urgent Need Mortgage Payment Assistance 	\$105,917,020
2. Food Bank Distribution Assistance	\$21,000,000
3. Provider Relief Assistance - Persons with Disabilities	\$5,000,000
4. Legal Services for Persons with Disabilities	\$250,000
TDHCA Administration and Technical Assistance (up to 7%)	\$9,679,238
Total first, second and third allocations from HUD	\$141,846,258

1. Urgent Need Assistance - \$105.9M

The COVID-19 pandemic has had a massive impact on families' abilities to work for pay, and their capacity to pay their rent or mortgage. Unpaid rents also affect landlords who must continue to pay mortgages, property taxes and maintenance costs for their rental properties in spite of their income from rents being reduced. Up to now, the need for assistance has far outpaced the availability of local rental assistance funds. The Coronavirus Relief Bill is expected to channel an estimated \$1.9 billion into Texas for this purpose. As such TDHCA is only proposing to dedicate \$37.4 million of CDBG-CV for this purpose and only to be made available for those entitlement communities having anticipated receiving contracts from the state by January 15, 2021, until such time as Coronavirus Relief Bill funds are able to be released by providers (whether that provider is the state or communities who receive their own allocation of COVID Relief Act funds). All other funds originally contemplated for rental assistance will be made available for mortgage payment assistance.

\$37.4 million Rental Assistance

Rental Assistance in Entitlement Communities with Existing Rental Assistance Programs. Approximately \$37.4 million will be directly committed to those entitlement communities already having COVID rental assistance programs and that have submitted an application for such rental assistance by the December 28, 2020 deadline already having been released by TDHCA. This will continue to allow those larger cities and counties that had anticipated receiving contracts by January

15, 2021, to still receive funds until Coronavirus Relief Bill rental assistance funds can be accessed. Cities and counties will generally be able to use their existing program design and intake forms subject to approval from the Department. The documents executed by households and landlords will need to be those prepared by the Department, or meeting Department approval. It is estimated these funds will be available in contracts by January 15, 2021.

As required by CDBG-CV rules, the emergency rental assistance will be made directly to the landlord or property owner, on behalf of the individual or families in need of assistance, and not directly to an individual or family in the form of a direct income payment. Funds dedicated to this activity will assist households for no more than six months of rental assistance, including arrears. The assistance will allow payments for up to 5 months of arrears and at least one month of forward payment of the full amount of the contracted rent up to the Department established limit.

Eviction Diversion: To keep Texans in their homes who have fallen behind on their rent because of the impact of COVID-19 and whose landlords have initiated eviction proceedings, Subrecipients receiving rental assistance will be required to also serve as the Eviction Diversion rental assistance provider for one or more designated Justices of the Peace as specified by TDHCA and the Office of Court Administration. Ten percent of their contract amount will be set aside for this activity until a specified time and then may be reallocated by the Department into other contracts for this activity or be allowed to be used for other rental assistance payments by, in the Department's sole discretion. Rental assistance will be in the form of lump sum payments to landlords in exchange for allowing tenants to remain in their homes. The Supreme Court of Texas is intending to remove or seal the initiated eviction from the household's record to mitigate the secondary effects on the tenant's ability to rent housing in the future. It is anticipated that the Coronavirus Relief Bill funds will now serve as the source for any other eviction diversion activities for the state.

\$68.5 million Mortgage Assistance

As required by CDBG-CV rules, the emergency mortgage assistance payments will be made directly to mortgage lenders / loan servicers, on behalf of the individual or families in need of assistance, and not directly to an individual or family in the form of a direct income payment. Funds dedicated to this activity will assist households for no more than six months of mortgage assistance, including arrears. The assistance will allow payments for up to 5 months of arrears and at least one month of forward payment of the full amount of the monthly mortgage payment up to the Department established limit.

Funds dedicated to mortgage assistance will be allocated regionally to ensure broad geographic distribution in the state and programmed in the following ways:

- Mortgage Assistance in Rural and Small Metro Areas: As required by HUD, TDHCA will allocate at least \$40,000,886 (the amount of its first allocation) to non-entitlement units of general local government through a competitive notice of funding availability and made available regionally. Non-entitlement units are cities with populations of less than 50,000 (except cities that are designated principal cities of Metropolitan Statistical Areas), and counties with populations of less than 200,000. There are approximately 1,000 rural and small cities and counties in Texas. The Department will provide specific program design guidelines, facilitating the program administration for non-entitlement awardees. Based on the length of conducting a competitive application, we estimate the assistance will be available in communities approximately 4-5 months from the time this Plan is accepted by HUD. The State may consider extending non-entitlement communities the option of having the state

administer a program on their behalf.

- Balance of State Coverage. The funds within each region not allocated for non-entitlement awardees – approximately \$28.5 million - will be used to fund one or more of the following: 1) entitlement communities, 2) local or regional nonprofit organizations, 3) and/or regional organizations to provide mortgage assistance to the balance of the area within a region. If needed the state may provide assistance to the balance of the area within a region. It is the intent of TDHCA that an eligible household anywhere in the state will be able to apply for mortgage assistance funds. To minimize the risk of duplication of benefits, properties in an area covered by a contracted non-entitlement or entitlement awardee will be assisted through that respective program, and will therefore not be eligible to be assisted through the regional or statewide activity.
2. Food Bank Distribution Assistance – \$21M
Funds dedicated to this activity will serve as state match for FEMA eligible activities related to food bank distribution. The Texas Department of Emergency Management (TDEM) has expended approximately \$133 million in food distribution activities to address food and nutrition needs statewide in response to the pandemic, of which the state was required to cover 25% (approximately \$33 million). These CDBG funds will cover approximately \$21 million of that match requirement, based upon a review of the CDBG eligibility of the incurred costs.
 3. Assistance for Persons with Disabilities – \$5M
Given that persons with disabilities (PWD) are disproportionately low income and may be particularly vulnerable to both the physical and economic effects of COVID-19, TDHCA is proposing to use \$5 million specifically for those providers and facilities that assist persons with disabilities. It is estimated that the state will enter agreements, non-competitively, with an existing network of subrecipients to assist local providers in accessing funds. We anticipate funds will be made available to providers in communities approximately 4 months from the time the Plan is accepted by HUD.
 4. Legal Services for Persons with Disability – \$250K
TDHCA will dedicate \$250K in legal services designed to address the specific needs and rights of people with disabilities who have been impacted by the pandemic.
 5. TDHCA Administration – \$9.7M
TDHCA is allowed to use up to 5 percent of its allocation for general administration and up to two percent for technical assistance for a total of \$9,929,238. However, TDHCA is planning to use up to \$9,679,238 – having dedicated \$250,000 out of this pool of funds for the provision of legal services for persons with disabilities. Also, from within the administration pool, up to approximately \$500,000 may be used to pursue expanded broadband planning efforts in the state focusing on the needs of households at 80% or below AMI. Some portion of these funds may be used to support the planning for and/or establishment of a statewide homeless information management warehouse, system or initiative.

NOTE: In the plan document that follows, the changes proposed are reflected in blackline so that the reader can quickly identify what has changed.

2015-2019 State of Texas Consolidated Plan
 SP-35 Anticipated Resources - 91.315(a)(4), 91.320(c)(1,2)

Anticipated Resources (only added row shown)

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of Con Plan: \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG-CV	public - federal	Admin and Planning Urgent Need Public Services Rental Assistance Financial Assistance	\$141,846,258	\$0	\$0	\$141,846,258	\$0	CDBG-CV funding will be allocated to the following activities to address the pandemic: 1) Rental assistance 2) Food bank distribution assistance 3) Relief to providers of persons with disabilities 4) Legal services for persons with disabilities 5) <u>Mortgage Assistance</u> 4)6) State Administration

State of Texas 2019 One-Year Action Plan

AP-15 Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of Con Plan: \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG-CV	public - federal	Admin and Planning Urgent Need Public Services Rental Assistance Financial Assistance	\$141,846,258	\$0	\$0	\$141,846,258	\$141,846,258	CDBG-CV funding will be allocated to the following activities to address the pandemic: 1) Rental assistance 2) Food bank distribution assistance 3) Relief to providers of persons with disabilities 4) Legal services for persons with disabilities 5) <u>Mortgage Assistance</u> 4)6) State Administration

AP-20 Annual Goals and Objectives

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
26	CDBG-CV Rental Mortgage Assistance for Rural and Small Metro Areas	2019	2019	Affordable Housing Non-Homeless Special Needs	State of Texas	Rental Assistance TBRA	CDBG-CV: \$40,000,886	Tenant-based rental assistance/Rapid Rehousing Other: <u>Mortgage Assistance: 9,462,887</u> Households
27	CDBG-CV Rental Assistance for Entitlement Communities with Existing COVID Rental Assistance Programs	2019	2019	Affordable Housing Non-Homeless Special Needs	State of Texas	Rental Assistance TBRA	CDBG-CV: <u>\$37,400,000</u> \$40,000,000	Tenant-based rental assistance/Rapid Rehousing: <u>4,111</u> Households Assisted <u>6,596</u>
28	CDBG-CV Rental Mortgage Assistance for Balance of State Coverage	2019	2019	Affordable Housing Non-Homeless Special Needs	State of Texas	Rental Assistance TBRA	CDBG-CV: <u>\$28,516,134</u> \$25,916,134	Tenant-based rental assistance/Rapid Rehousing Other: <u>Mortgage assistance/Rapid Rehousing: 2,771</u> 5,036 Households Assisted
29	CDBG-CV Food bank distribution assistance	2019	2019	Non-Housing Community Development	State of Texas	Public Services	CDBG-CV: \$21,000,000	Public Service activities other than Low/moderate income housing benefit: 0 Persons Assisted*
30	CDBG-CV Relief to Providers of Persons with Disabilities	2019	2019	Non-Housing Community Development Non-Homeless Special Needs	State of Texas	Public Services	CDBG-CV: \$5,000,000	Public Service activities other than Low/moderate income housing benefit: 0 Persons Assisted*
31	CDBG-CV Legal Services for Persons With Disabilities	2019	2019	Non-Housing Community Development Non-Homeless Special Needs	State of Texas	Public Services	CDBG-CV: \$250,000	Public Service activities other than Low/moderate income housing benefit: 0 Persons Assisted*
32	CDBG-CV Administration	2019	2019	Administration/ Technical Assistance	State of Texas	Rental Assistance TBRA Admin and Planning Public Service	CDBG-CV: \$9,679,238	Other: 0 Other

* Please note that in SP-45 and AP-20 below, the Goal Outcome Indicator for both programs reflects 0 persons being assisted at this time. The HUD system requires that a numeral be entered here, yet at this time an estimate is not available. Therefore, the field is defaulted to 0.

Goals Summary

26	Goal Name	CDBG-CV Rental-Mortgage Assistance for Rural and Small Metro Areas
	Goal Description	Funds will be awarded competitively to units of general local governments (UGLGs) in the state of Texas for rental-mortgage assistance funds using a regional allocation to ensure broad geographic distribution in the state.
27	Goal Name	CDBG-CV Rental Assistance for Entitlement Communities with Existing Rental Assistance Programs
	Goal Description	Fund will be directly committed to those entitlement communities already having existing COVID rental assistance programs <u>and that applied for such program funds by the December 28, 2020 deadline already released.</u> This will allow those larger cities and counties to quickly channel funds through their current program infrastructure <u>until other Treasury dedicated rental assistance funds are available.</u>
28	Goal Name	CDBG-CV Rental-Mortgage Assistance for Balance of State Coverage
	Goal Description	The funds within each region not allocated for non-entitlement awardees – approximately \$28.5 million - will be used to fund one or more of the following: 1) entitlement communities, 2) local or regional nonprofit organizations, 3) and/or regional organizations to provide mortgage assistance to the balance of the area within a region. If needed the state may provide assistance to the balance of the area within a region. The funds within each region not allocated for non-entitlement awardees and not committed directly to entitlement communities with existing rental assistance programs – approximately \$25.9 million – will be used to fund one or more of the following: 1) entitlement communities within that region not already having a rental program in operation, 2) a regional organization to provide rental assistance to the balance of the area within that region, and/or 3) if needed the state may provide assistance to the balance of the area within that region.
29	Goal Name	CDBG-CV Food Bank Distribution Assistance
	Goal Description	Funds dedicated to this activity will serve as state match for FEMA eligible activities related to food bank distribution. The Texas Department of Emergency Management (TDEM) has expended approximately \$133 million in food distribution activities to address food and nutrition needs statewide in response to the pandemic, of which the state was required to cover 25% (approximately \$33 million). These CDBG funds will cover approximately \$21 million of that match requirement, based upon a review of the CDBG eligibility of the incurred costs.
30	Goal Name	Relief to Providers of Persons with Disabilities
	Goal Description	Funds will support relief assistance to providers of persons with disabilities, such as group homes, covering the costs of activities like: salaries, sheltering residents outside of group homes when quarantining, Personal Protective Equipment (PPP) and if determined eligible by HUD, the cost of holding beds for tenants who area temporarily relocated because of COVID-19.
31	Goal Name	CDBG-CV Legal Services for Persons With Disabilities
	Goal Description	Funds will be directed to Disability Rights Texas to provide unique legal services to persons with disabilities.
32	Goal Name	CDBG-CV Administration

	Goal Description	CDBG-CV General Administrative costs including Technical Assistance. Up to \$500,000 of these funds will also be used to support broadband planning. <u>Some portion of these funds may be used to support the planning for and/or establishment of a statewide homeless information management warehouse, system or initiative.</u>
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AP-30 Methods of Distribution

Distribution Methods

Table 1 - Distribution Methods by State Program

26	State Program Name:	CDBG-CV Rental-Mortgage Assistance for Rural and Small Metro Areas
	Funding Sources:	CDBG-CV: \$40,000,886
	Describe the state program addressed by the Method of Distribution.	Funds will be made available competitively and regionally to all Texas non-entitlement units of general local government (UGLGs) to apply as Subrecipients with funds limited to use for rental-mortgage assistance. Funds not applied for within a region will be made available to non-entitlement applications from other regions. Subrecipients who apply can elect service areas of its jurisdiction (one city, one county) and enter into a contract for a given amount of funds.
	Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	<p>A Notice of Funding Availability will contain a description of all criteria used to select applicants for funding, including the relative weight of each criterion.</p> <p>Priority will be given to non-entitlement UGLGs who have an existing rental assistance activity in place that can readily utilize the funds and applicants that: 1) agree to access their CRF funds to be used as rental assistance, if not expended by that time, or 2) have already accessed their Coronavirus Relief Fund (CRF) allocation.</p> <p>The Department will provide specific program design guidelines, facilitating the program administration for non-entitlement awardees that do not have an existing rental-mortgage assistance program.</p>
	Describe how resources will be allocated among funding categories.	<p>Funds dedicated to this activity will assist households for <u>no more than six months</u> of rental and mortgage assistance, including arrears. The assistance will allow payments for up to 5 months of arrears and at least one month of forward payment of the full amount of the <u>monthly mortgage payment – including principal, interest, taxes, and insurance - if escrowed up to the Department-established limit</u>. It is unclear at this time if taxes (as escrowed) are an eligible cost; however, because the taxes escrowed are a component of any arrears and payment, TDHCA would like to be able to determine this to be an eligible cost. If not initially determined by HUD as eligible, TDHCA will request a waiver from HUD for this factor so that the assistance can be of greatest help to Texans affected by the pandemic. contracted rent up to the Department established limit.</p> <p>The households needing assistance would be identified by Subrecipients reaching out to <u>households in their community, properties and/or tenants</u>. Subrecipients will accept applications from landlords and will have the option of <u>also working with clients directly households</u>, however all payments must be made to landlords mortgagees/loan servicers directly.</p>
	Describe threshold factors and grant size limits.	A grant limit per contract and threshold factors for subrecipients will be identified in the Notice of Funding Availability. Program participants must evidence or certify that they have been economically impacted by the pandemic and assistance is limited to no more than 6 consecutive months of rental

		assistance per household. <u>There may also be limitations regarding mortgages held or financed by a public agency.</u>
What are the outcome measures expected as a result of the method of distribution?		Based on the following calculations, we estimate serving <u>6,3113,887</u> households <ul style="list-style-type: none"> • Average <u>Texas Mortgage Payment (including taxes) Fair Market Rent (FMR) for non-entitlement counties in Texas= \$1,492,919</u> • Estimated average months of assistance = 6 months • Total Cost for <u>4-6 months at Avg. FRM-Mortgage Payment = \$5,5148,952</u> • Allocation of \$40,000,886 (minus 13% Subrecipient admin) = Estimated funds available for rental assistance or \$34,800,770 • Estimated # of Households to be served: <u>6,3113,887</u>

27	State Program Name:	CDBG-CV Rental Assistance for Entitlement Communities with Existing Rental Assistance Programs
	Funding Sources:	CDBG-CV: \$40,000,000 <u>\$37,400,000</u>
	Describe the state program addressed by the Method of Distribution.	Approximately \$37.440 million will be committed through non-competitive direct awards to those entitlement communities already having rental assistance programs responsive to the pandemic and that applied for CDBG-CV from the Department by December 28, 2020. The program is voluntary and cities and counties will have an opportunity to accept or decline the funds.
	Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	There are 74 CDBG entitlement communities in the State of Texas. The Department will offered rental assistance grants to those entitlement cities and counties already operating COVID-19 rental assistance programs. This will allow those larger cities and counties to quickly channel funds through their current programs until the Coronavirus Relief Bill rental assistance funds are available.
	Describe how resources will be allocated among funding categories.	Funds dedicated to this activity will assist households for no more than six months of rental and assistance, including arrears. The assistance will allow payments for up to 5 months of arrears and at least one month of forward payment of the full amount of the contracted rent up to the Department established limit. The households needing assistance would be identified by Subrecipients reaching out to properties and/or tenants. Subrecipients will accept applications from landlords and will have the option of working with clients directly or via landlords, however all payments must be made to landlords directly.
	Describe threshold factors and grant size limits.	The amount of funds each entitlement will receive will be determined by dividing-allocating the \$37.440M in this category among the entitlements with COVID-19 rental assistance programs that <u>applied for such accept</u> funds by using an allocation formula similar to the one HUD used to distribute its CDBG-CV 2 funds. Factors considered in the allocation formula for each entitlement include the number of low-income elderly, unemployment cases, children in poverty and rate of COVID-19 cases.

	<p>What are the outcome measures expected as a result of the method of distribution?</p>	<p>Based on the following calculations, we estimate serving 4,111<u>4,397</u> households</p> <ul style="list-style-type: none"> • Average Fair Market Rent (FMR) for entitlement counties in Texas= \$1,319 • Estimated average months of assistance = 6 months • Total Cost for <u>6</u>4 months at Avg. FRM = \$7,914 • Allocation of \$40,000,000<u>\$37,400,000</u> minus 13% Subrecipient admin = Estimated funds available for rental assistance or \$34,800,000<u>\$32,538,000</u> • Estimated # of Households to be served: 4,397<u>4,111</u>
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28	State Program Name:	CDBG-CV Rental Mortgage Assistance for Balance of State Coverage
	Funding Sources:	CDBG-CV: \$28,516,134 25,916,131
	Describe the state program addressed by the Method of Distribution.	<p>The funds within each region not allocated for non-entitlement awardees – approximately \$28.5 million - will be used to fund mortgage assistance to one or more of the following: 1) entitlement communities, 2) local or regional nonprofit organizations, 3) and/or regional organizations to cover the balance of an area within a region. The funds within each region not allocated for non-entitlement awardees and not committed directly to entitlement communities with existing rental assistance programs – approximately \$25.9 million – will be made available through a competitive application process to fund one or more of the following:</p> <ol style="list-style-type: none"> 1. Entitlement communities within that region not already having a rental program in operation, 2. A regional organization to provide rental assistance to the balance of the area within that region, and/or <p>If no organizations applies to serve a given area, the state may provide assistance to the balance of the area within that region.</p> <p>It is the intent of TDHCA that an eligible household anywhere in the state will be able to apply for mortgage assistance funds. Properties in an area covered by a contracted non-entitlement or entitlement awardee will be assisted through that respective program, and will therefore not be eligible to be assisted through the regional or statewide activity.</p>
	Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	Priority will be given to subrecipients that can readily utilize the funds and establish a program within a short amount of time given the contracts will be for a one-year period. Other criteria will be further explained in the Notice of Funding Availability.
	Describe how resources will be allocated among funding categories.	Funds dedicated to this activity will assist households for <u>no more than six months</u> of rental and mortgage assistance, including arrears. The assistance will allow payments for up to 5 months of arrears and at least one month of forward payment of the full amount of the <u>monthly mortgage payment – including principal, interest, taxes and insurance</u> contracted rent up to the Department established limit. <u>It is unclear at this time if taxes (as escrowed) are an eligible cost; however, because the taxes escrowed are a component of any arrears and payment, TDHCA would like to be able to determine this to be an eligible cost. If not initially eligible, TDHCA will request a waiver from HUD for this factor so that the assistance can be of greatest help to Texans affected by the pandemic.</u>

		The households needing assistance would be identified by Subrecipients reaching out to properties and/or tenants. Subrecipients will accept applications from landlords and will have the option of also working with clients directly or via landlords, however households. a All payments must be made to mortgagees/loan servicers landlords directly.
	Describe threshold factors and grant size limits.	Households must be able to evidence or certify that they have been economically impacted by the pandemic. No threshold or grant size limits will apply on a per household or per property basis, beyond that assistance is limited to no more than 6 months of rental assistance per household <u>and costs must be reasonable.</u>
	What are the outcome measures expected as a result of the method of distribution?	Based on the following calculations, we estimate serving 3,358,771 households <ul style="list-style-type: none"> • Average <u>Texas Mortgage Payment (including taxes) Fair Market Rent (FMR) for all counties in Texas= \$1,119,492</u> • Estimated average months of assistance = 6 months • Total Cost for 6 months at Avg. FRM = \$6,7148,952 • Allocation of \$28,516,134\$25,916,131 minus 13% Subrecipient admin) = Estimated funds available for rental assistance \$24,809,036\$22,547,034 Estimated # of Households to be served: 2,7713,358

29	State Program Name:	CDBG-CV Food Bank Distribution Assistance
	Funding Sources:	CDBG-CV: \$21,000,000
	Describe the state program addressed by the Method of Distribution.	Funds dedicated to this activity will serve as state match for FEMA eligible activities related to food bank distribution. The Texas Department of Emergency Management (TDEM) has expended approximately \$133 million in food distribution activities to address food and nutrition needs statewide in response to the pandemic, of which the state was required to cover 25% (approximately \$33 million). These CDBG funds will cover approximately \$21 million of that match requirement, based upon a review of the CDBG eligibility of the incurred costs. This activity will be accomplished through the execution of an Interagency Agreement between TDHCA and TDEM. Upon execution, funds can be paid. It is estimated that funds can be distributed to TDEM within approximately 3 months from the time the Plan is accepted by HUD
	Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	Not applicable.

	Describe how resources will be allocated among funding categories.	Not applicable.
	Describe threshold factors and grant size limits.	Not applicable.
	What are the outcome measures expected as a result of the method of distribution?	Match for eligible CDBG food expenses already incurred by the State.

30	State Program Name:	CDBG-CV Assistance for Group Home Providers of Persons with Disabilities
	Funding Sources:	CDBG-CV: \$5,000,000
	Describe the state program addressed by the Method of Distribution.	These funds will be made available to housing providers of assistance to persons with disabilities (to be defined in subsequent documents but intended to include group homes) to allow those entities to receive reimbursement for a series of eligible COVID-related expenses (not having been paid or is available to be paid for by another pandemic-specific funding source).
	Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	TDHCA intends to allow eligible providers to include both nonprofit and for profit entities. However, for-profit entities may be more limited in the assistance they can receive which may be determined, in part, by their ownership structure and access to other resources.
	Describe how resources will be allocated among funding categories.	This activity will cover the cost of salaries/wages for employees hired or retained specifically to provide COVID related assistance; hotel or room costs for expenses incurred in keeping PWD clients quarantined; costs of purchasing Personal Protection Equipment (PPE) for staff and PWD clients; and costs of holding beds for clients who are temporarily relocated because of COVID but cannot be made available to a new client if determined allowable by HUD.
	Describe threshold factors and grant size limits.	A maximum amount of assistance by category type and per provider will be implemented.
	What are the outcome measures expected as a result of the method of distribution?	Providers assisted (unknown number at this time).
31	State Program Name:	CDBG-CV Legal Services for Persons With Disabilities
	Funding Sources:	CDBG-CV: \$250,000

	Describe the state program addressed by the Method of Distribution.	Funds will be directed to Disability Rights Texas to provide unique legal services to persons with disabilities. This will be accomplished through a contract with Disability Rights Texas to administer the funds.
	Describe all of the criteria that will be used to select applications and the relative importance of these criteria.	Not Applicable
	Describe how resources will be allocated among funding categories.	Not Applicable
	Describe threshold factors and grant size limits.	Not Applicable
	What are the outcome measures expected as a result of the method of distribution?	Legal Services provided to Persons with Disabilities

AP-35 Projects – (Optional)

Introduction:

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

TDHCA will receive \$9,127,824 in ESG, DSHS will receive \$4,422,464 under the 2019 HOPWA allocation. TDHCA has been allocated an additional \$97,792,616 in 2020 ESG-CV funds, and \$141,846,258 in CDBG-CV funds and DSHS has been allocated an additional \$724,936 under the CARES Act, outlined as ESG20 Texas, CV- and CV-COVID-19 respectively for the purposes of this plan, and the use of these funds is further described below.

#	Project Name
26	CDBG-CV Rental Mortgage Assistance for Rural and Small Metro Areas
27	CDBG-CV Rental Assistance for Entitlement Communities with Existing Rental Assistance Programs
28	CDBG-CV Rental Mortgage Assistance for Balance of State Coverage
29	CDBG-CV Food Bank Distribution Assistance
30	CDBG-CV Relief Assistance for Providers of Persons with Disabilities
31	CDBG-CV Legal Services for Persons With Disabilities

Table 2 – Project Information

Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

Reasons for allocation priorities and other obstacles to addressing underserved needs can be found in the description of ~~ESG20 and~~ CDBG-CV projects above. Actions to meeting underserved needs are found in Action Plan Section 85.

AP-38 Project Summary
 Project Summary Information

26	Project Name	CDBG-CV Rental <u>Mortgage</u> Assistance for Rural and Small Metro Areas
	Target Area	State of Texas
	Goals Supported	Funds will be awarded competitively to units of general local governments (UGLGs) in the state of Texas for rental/utility assistance. <u>If there are insufficient applicants, the Department may request UGLGs to hold a public hearing for the state to administer these funds on behalf of the UGLG.</u>
	Needs Addressed	Rental <u>Mortgage</u> Payment Assistance
	Funding	CDBG-CV: \$40,000,886
	Description	Funds will be awarded competitively to units of general local governments (UGLGs) in the state of Texas for <u>mortgage</u> rental assistance funds.
	Target Date	9/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	6,314 <u>3,887</u> Households
	Location Description	N/A
	Planned Activities	<u>Mortgage</u> Rental Assistance
27	Project Name	CDBG-CV Rental Assistance for Entitlement Communities with Existing Rental Assistance Programs
	Target Area	State of Texas
	Goals Supported	Fund will be directly committed to those entitlement communities already having rental assistance programs <u>that applied to TDHCA by December 28, 2020</u> . This will allow those larger cities and counties to quickly channel funds through their current programs.
	Needs Addressed	Rental Assistance
	Funding	CDBG-CV: \$40,000,000 <u>\$37,400,000</u>

	Description	Fund will be directly committed to those entitlement communities already having rental assistance programs that applied to TDHCA by December 28, 2020. This will allow those larger cities and counties to quickly channel funds through their current programs.
	Target Date	9/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	4,114,397 Households
	Location Description	N/A
	Planned Activities	Rental Assistance
28	Project Name	CDBG-CV Rental Mortgage Assistance for Balance of State Coverage
	Target Area	State of Texas
	Goals Supported	Rental Mortgage Assistance
	Needs Addressed	Rental Mortgage Assistance
	Funding	CDBG-CV: 28,516,134 \$25,916,131
	Description	<p>The funds within each region not allocated for non-entitlement awardees and not committed directly to entitlement communities with existing rental assistance programs—approximately \$28.525.9 million - will be used to fund mortgage assistance to one or more of the following: 1) entitlement communities, 2) local or regional nonprofit organizations, 3) and/or regional organizations to cover the balance of an area within a region. If no organizations apply to serve a given area, the state may provide assistance to the balance of the area within that region.</p> <p>one or more of the following: 1) entitlement communities within that region not already having a rental program in operation, 2) a regional organization to provide rental assistance to the balance of the area within that region, and/or 3) if needed the state may provide assistance to the balance of the area within that region.</p>
	Target Date	9/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	2,7713,358 households served
	Location Description	Not applicable

	Planned Activities	Rental Mortgage Assistance
29	Project Name	CV- Food Bank Distribution Assistance
	Target Area	State of Texas
	Goals Supported	CDBG-CV Feeding Texans Pandemic Response Program
	Needs Addressed	Public Services
	Funding	CDBG-CV: \$21,000,000
	Description	<p>Funds dedicated to this activity will serve as state match for FEMA eligible activities related to food bank distribution. The Texas Department of Emergency Management (TDEM) has expended approximately \$133 million in food distribution activities to address food and nutrition needs statewide in response to the pandemic, of which the state was required to cover 25% (approximately \$33 million). These CDBG funds will cover approximately \$21 million of that match requirement, based upon a review of the CDBG eligibility of the incurred costs.</p> <p>This activity will be accomplished through the execution of an Interagency Agreement between TDHCA and TDEM. Upon execution, funds can be paid. It is estimated that funds can be distributed to TDEM within approximately 3 months from the time the Plan is accepted by HUD.</p>
	Target Date	9/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	Not applicable
	Location Description	Not applicable
	Planned Activities	FEMA match for Food distribution
30	Project Name	CDBG-CV Relief to Providers of Persons with Disabilities
	Target Area	State of Texas
	Goals Supported	Providers assisted
	Needs Addressed	Public Services
	Funding	CDBG-CV: \$5,000,000

	Description	These funds will be made available to housing providers of assistance to persons with disabilities (to be defined in subsequent documents but intended to include group homes) to allow those entities to receive reimbursement for a series of eligible COVID-related expenses (not having been paid or is available to be paid for by another pandemic-specific funding source).
	Target Date	9/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	Unknown at this this time
	Location Description	Not applicable
	Planned Activities	Relief to Providers of Persons with Disabilities
31	Project Name	CDBG-CV Legal Services for Persons With Disabilities
	Target Area	State of Texas
	Goals Supported	Legal Services for Persons with Disabilities
	Needs Addressed	Public Services
	Funding	CDBG-CV: \$250,000
	Description	Funds will be directed to Disability Rights Texas to provide unique legal services to persons with disabilities
	Target Date	9/30/2022
	Estimate the number and type of families that will benefit from the proposed activities	Unknown at this time
	Location Description	Not applicable
	Planned Activities	Provision of legal services to Persons with Disabilities

PUBLIC COMMENT



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Attn: Bobby Wilkinson
Executive Director
Texas Department of Housing and Community Affairs
221 East 11th Street
Austin, Texas 78701

RE: CDBG-CV - 2nd Substantial Amendment to the State of TX Cons. Plan:
2019 One-Year Action Plan

Dear Mr. Wilkinson:

I am writing this letter in support of dedicating funding for the planning and/or establishment of a statewide homeless information management warehouse, system or initiative as identified within the CDBG-CV - 2nd Substantial Amendment to the State of TX Cons. Plan: 2019 One-Year Action Plan. Texas Homeless Network (THN) is currently working with Texas Continuums of Care on the pilot implementation of this project called the Texas Homeless Data Sharing Network (THDSN) and support is needed to continue this project into the first full implementation year in 2021. I've included more detailed information on the THDSN below.

Texas Homeless Network Overview:

THN is a non-profit membership-based organization helping communities strategically plan to prevent and end homelessness. THN works to end homelessness in Texas by collaborating with all communities, large and small, across the state to build systems to achieve this goal. We coordinate local, state, and national advocacy efforts, conduct data collection and research, host an annual statewide conference, and serve as the host agency for the Texas Balance of State Continuum of Care where we assist in the coordination of programs and funding over a vast, mostly rural 215 county region.

THN works with the lead agencies representing homeless crisis response systems in Texas. A homeless crisis response system is also known as a Continuum of Care (CoC), a collaborative funding and planning approach, required by the US Department of Housing and Urban Development (HUD) as part of homeless assistance grant funding, that helps communities plan for and provide, as necessary, a full range of resources from supportive services to housing to address the needs of persons experiencing homelessness. CoCs are made up of service providers, such as emergency shelters, mental health authorities and housing providers, as well as advocates, government officials, housing authorities, and other agencies that work to reduce homelessness.

The Problem:

On any given day, there are more than 27,000 Texans experiencing homelessness throughout the state, including over 1,900 families with children, 204 children under the age of 18 that are unaccompanied and 1,806 veterans; many with families who are also experiencing homelessness. Throughout Texas, there are 11

separate homeless crisis response systems that communicate, plan, and implement interventions through sharing HUD regulated Homeless Management Information Systems (HMIS) data on those they serve within their systems' geographic boundaries. However, currently, there is no way for each homeless crisis response system to share HMIS data across their geographic boundaries easily. The ease of information sharing is crucial to homeless crisis response systems around Texas, because even a slight hindrance in quickly linking households to the help they need may result in missed opportunities for the clients, more staff time spent, and higher costs to the community.

During the fall of 2017, the devastating effects of Hurricane Harvey demonstrated the need for quicker and more efficient communication between Texas' homeless crisis response systems. Thousands of individuals and families experiencing homelessness were forced to relocate to inland regions of Texas due to unlivable conditions in the state's Gulf Coast areas. Unfortunately, there were no effective or cohesive processes in place to share information about these households from region to region, nor was a communication tool in place for identifying housing shelter and service opportunities from region to region. The lack of communication between homeless crisis response systems was especially problematic for households and individuals involved in treatment, training, or other case management interventions to maintain or improve health, employment, or other beneficial outcomes as they work on exiting homelessness.

Having a collaborative statewide HMIS database to find previous case management notes about interventions, client background, and what clients were prequalified for rather than starting from nothing, would have resulted in better outcomes for individuals and families experiencing homelessness, as well as more efficient and less costly interventions by the community and service providers. The benefits realized through the use of a fully implemented information sharing network would, likewise, be useful now during the COVID-19 pandemic as we seek to efficiently use the scarce resources available to keep Texans safe. And, this benefit holds true in work with households and individuals enduring mini-catastrophes on a day-to-day basis.

The Solution:

To address the client information sharing inefficiencies and care coordination issues between Texas' homeless crisis response systems, THN and our CoC partners throughout the state began formal collaboration and planning in October 2019 to connect each of Texas' 11 homeless crisis response systems into one information sharing network, called the Texas Homeless Data Sharing Network (THDSN).

The immediate objective of this project is to create an expanded data sharing network utilized by Texas' homeless crisis response systems that will allow us to quickly identify people at-risk of or experiencing homelessness and the resources that can best assist them. This will make our homeless crisis response systems more agile resulting in persons or households exiting the system quickly or remaining housed. For example, with an integrated data sharing network, service coordinators will have access to data on clients' history of homelessness, health needs, and employment, as well as services and housing they have utilized allowing for tailored intervention plans and saving staff time and costs that they could use to assist other clients. The network will also be especially useful for identifying the chronically homeless and veterans so they can be targeted for services and interventions.

The extended goal of the project is to collaborate with other systems that intersect with people experiencing homelessness. These include law enforcement agencies, schools, health care institutions and Managed Care Organizations (MCOs). Through expanded data sharing collaborations, we can reliably track trends and identify frequent users to address system obstructions and vulnerabilities among specific sub-populations. This shared data will allow expanded and efficient access to resources and services by those experiencing homelessness and those trying to provide help, especially when dealing with health crises like the COVID-19 pandemic. This increased collaboration will result in improved futures for our most vulnerable and will also save taxpayers and community services' money by preventing or diverting households away from homelessness.

This is a pilot project which includes a multifaceted and strategically planned implementation process. In August 2019, THN completed a proof-of-concept, with in-kind support from Amazon Web Services, that included merging data sets between two large homeless crisis response systems that cover 215 mostly rural counties, the City of Houston, and two of its suburban counties. The project's planning phase started in October of 2019 allowing the necessary time to plan out the implementation phase of the project. During the planning phase, THN utilized \$60,000 in funding awarded by the Better Together Fund, to support the consultative services of the Corporation for Supportive Housing (CSH) to create a governance structure, finalize a pilot project work plan, establish a THDSN Board, and identify a data warehouse vendor. The project's planning phase concluded in April of 2020 as THN contracted with a vendor to build and manage the data warehouse. The project's Implementation Year 1 began in May 2020 and is currently supported by funding from Wells Fargo and the Moody Foundation.

Value & Scalability:

The THDSN is a unique and innovative data systems integration project that can be replicated and used as an example for Homeless Management Information System (HMIS) integration efforts across the country. While many states, such as Massachusetts, Virginia, and California, have set aside state funding to solve this problem, the implementation in Texas has not received state or federal funding. It is entirely supported by foundations at this point. Because of that, this project's success is entirely dependent on the leadership, vision and ability of lead staff at the host agency, THN, to acquire funding for the future operation of the data sharing network. Due to these unique circumstances, THN worked with consulting partners, CSH and ICF International, to develop a strategic project model that has the ability to be successful in geographic areas as large as Texas but can also be scaled-down to be replicated for other states across the country. The model includes a governance structure, formal planning phase, data warehouse vendor selection process, staffing allocation processes, multifaceted implementation phase and an operational phase. This model can be adopted and replicated by states trying to integrate HMIS data systems throughout the country, especially states who are not fortunate enough to have state or government funding available to support these efforts.

This project is currently the largest statewide HMIS data integration effort in the United States and will improve the livelihoods of thousands of people experiencing homelessness as well as save tax-payer money throughout the state of Texas. As state and nation-wide homelessness numbers continue to rise, and with the staggering estimated increase of homeless populations due to the current pandemic-era economy, we believe that now is the time to address and resolve this issue that negatively impacts not only those experiencing homelessness, but all citizens of Texas. THN and our homeless crisis response system partners strive to make homelessness rare, brief, and nonrecurring for Texans and the success of the Texas Homeless Data Sharing Network will be a massive, Texas-sized step towards completing that goal.

Governance Structure:

The THDSN project is guided by two boards, the THN Board and the THDSN Board. The THN Board consists of 10 members with over 20 years of combined experience working with THN. The THN Board collaborates with the THN Director of Development and Communications to solicit in-kind and financial support and also provides programmatic support and direction from its members, many of whom are subject matter experts in the homelessness prevention community. The THN Board provides oversight to all of the agency's programs, including the THDSN. The THDSN Board is made up of 9 representatives from each of the lead agencies representing the Continuums of Care participating in the project's governance. Over half of these members either serve as the HMIS lead for their CoC or have experience serving in that capacity. Since this project relies on participation from homeless crisis response systems, this Board's makeup and role in the project's success is invaluable.

Data Warehouse Vendor Information:

The critical infrastructure for this project is the data warehouse which is operated and maintained by our data warehouse vendor in partnership with staff from THN. When established, the data warehouse will be the central data repository for all homeless crisis response systems in Texas that are sharing their data with the network. In April of 2020, THN contracted with Green River to deploy, configure, and support the installation of the THDSN data warehouse. Green River is a Vermont-based custom software engineering firm focused on projects with social impact and are actively committed in the fight to end homelessness. In 2016, Green River began working with the City of Boston on a system to bring together records from multiple HMIS sources. The resulting Open Path software has evolved into a rich platform to integrate homeless data systems for broad analysis and individual client care coordination and they've utilized this same platform to tackle several similar HMIS data sharing projects since that time in the states of Indiana, Massachusetts, and Virginia. Green River is an APN Select Technology Partner.

Current Project Status:

We kicked off the project's implementation phase by receiving commitments from two CoCs which cover 218 of Texas' 254 counties in the fight to end homelessness. These CoCs will soon begin initial data uploads to the network and THN, along with Green River, will then begin analyzing the data for trends in homeless populations and deduplicating data sets. These initial data uploads will be conducted manually but we are working with these CoCs to conduct regular automated data uploads going forward. By the end of this first implementation year, we expect to receive project commitments from at least three additional CoCs and begin integrating their data into the network. This will mean that we will have active participation from five homeless crisis response systems covering at least 85% of Texas' geographic areas by the end of the project's first implementation year and THN will continue working with our other CoC partners to encourage them to sign on as active participants.

If you have any questions, please do not hesitate to contact me.

Sincerely,



Eric Samuels

The newly amended care plan clearly identified the many different needs that has resulted from Covid 19. The 141.8 million dollars was a very generous place to start but this emergency situation ripped throughout our nation and caused irreparable harm, advancing homeless and poverty with an impact that will take years to fully address.

Nevertheless, I feel that the money was allocated fairly and equitably focusing on a need to mitigate this horror in a most compassionate and rational manner. The effects of homelessness can be costly not only in terms of tax dollars spent but also the strain that this puts on Social Service agencies. This becomes a real issue for people with disabilities who tend to be renters. This population in the best of circumstances experience real barriers in terms of accessing affordable and appropriate housing. Homelessness can become especially dire for them, it increases the prospect of crimes against them, it creates additional barriers to needed health care, and they can be tossed in inadequate shelters with staff who are not trained to work with them.

It's also very clear that the 40 million used to decrease foreclosures was a very well thought out decision. Foreclosures can affect the economy in a variety of ways which cover state, local and national levels. The Housing market packs a lot of power and mass foreclosures creates a very unstable economy , due to a decrease in property values, lost state and local revenue as well as a lost of jobs. We also feel that the funds allocated towards legal aid will be very useful in helping disadvantaged people resolve their issues and we hope that these resources continue. Mallory Freitag and Gloria Purvis HGAC Resource Center

North Texas Aging and Disability Services

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

MASCARI CORPORATION, d.b.a. North Texas Aging and Disability Services, is a contract provider of Housing Navigation Services. These services are provided under contract with the North Central Texas Council of Governments through its North Central Texas Aging and Disability Resource Center "NCT ADRC". The comments below are being submitted in response to the Public Comment period for TEXAS DEPARTMENT OF HOUSING AND COMMUNITY AFFAIRS CDBG-CV Second Substantial Amendment to 2019 One-Year Action Plan.

In understanding the need for mortgage assistance resources, we are still receiving calls from numerous people and agencies in non-participating jurisdictions for rental assistance primarily because funds have been exhausted, but also because unique circumstances deem them ineligible. This proposed change converts all the non-participating jurisdiction funding from Tenant based rental assistance/Rapid Rehousing to mortgage assistance under both sort order 26 and 28 on page 7, while leaving only Entitlement Communities with Tenant-Bases rental assistance /Rapid Rehousing funding under Sort Order 27. We need to be removing restriction on all of these funds to be used for whatever the frontline workers see as the most urgent need while they are serving these people. That being said, I strongly suggest that the Goal Outcome Indicators for the items under Sort Order 26, 27 and 28 On page 7 be changed to read "Tenant based rental assistance/Rapid Rehousing/Other Mortgage Assistance.

Subsequently, I would like to see the Goal Summary on page 9 be changed to read "Rent/Mortgage Assistance" for items 26, 27 and 28 under Goal Name and Goal Description as well as on page 11, 12, 13, 14 & 15 under AP-30 Methods of Distribution as appropriate under State Program Name, Descriptions, and outcomes and on the AP-35 Projects pages 18, 19, 20 & 21.

Submitted by:

Martin Mascari
President