

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.

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.

The 2020-2024 Consolidated Plan identified priorities for CDBG funding during the next five years. Priorities that were met during PY20 were the funding of supportive services for low-moderate income residents; minor home repair, weatherization and accessibility improvements that allowed elderly homeowners to "age in place" and improved their living conditions; homeownership assistance, funding for the development of transitional housing and façade improvements for a subsidized rental complex. The City received two CDBG-CV grants which allowed the City to fund programs to further address the priorities identified in the 2020 – 2024 Consolidated Plan including funding a homeless shelter. All activities are discussed in more detail in the section below. NUMBERS NEED UPDATING AND COMPLETING

CDBG ACTIVITIES

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
ADMINISTRATION (AD) 5.1	Non-Housing Community Development	CDBG: \$82,637.60	Other	Other	250	250	100.00%	250	250	100.00%

DEMOLITION ACTIVITIES (DA) 4.1	Non-Housing Community Development	CDBG: \$0	Buildings Demolished	Buildings	1	0	0.00%	0	0	0.00%
ECONOMIC DEVELOPMENT (ED) 3.1	Non-Housing Community Development	CDBG: \$0	Jobs created/retained	Jobs	1	0	0.00%	0	0	0.00%
ECONOMIC DEVELOPMENT (ED) 3.2	Non-Housing Community Development	CDBG: \$0	Businesses assisted	Businesses Assisted	1	0	0.00%	0	0	0.00%
HOUSING NEEDS (HN) 1.1 Habitat	Affordable Housing	CDBG: \$11,500	Direct Financial Assistance to Homebuyers	Households Assisted	25	1	4.00%	5	1	20.00%
HOUSING NEEDS (HN) 1.2 MHR	Affordable Housing	CDBG: \$80,000	Homeowner Housing Rehabilitated -	Household Housing Unit	20	7	35.00%	6	7	117.00%
HOUSING NEEDS (HN) 1.3 Habitat	Affordable Housing	CDBG: \$108,387.10	Homeowner Housing Rehabilitated -	Household Housing Unit	20	3	15.00%	10	3	30.00%
HOUSING NEEDS (HN) 1.4	Affordable Housing	CDBG: \$0	Homeowner Housing Rehabilitated	Household Housing Unit	30	0	0.00%	0	0	0.00%
HOUSING NEEDS (HN) 1.5 Village Circle	Affordable Housing	CDBG: \$75,038	Rental units rehabilitated	Household Housing Unit	50	0	0.00%	10	10	100.00%

HOUSING NEEDS (HN) 1.6	Homeless	CDBG: \$0	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	1	0	0.00%	0	0	0.00%
HOUSING NEEDS (HN) 1.7 CCCC	Homeless	CDBG: \$36,000	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	48	0	0.00%	48	0	0.00%
PUBLIC FACILITIES (SLE) 2.1	Non-Housing Community Development	CDBG: \$0	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1	0	0.00%	0	0	0.00%
PUBLIC FACILITIES (SLE) 2.2	Non-Housing Community Development	CDBG: \$0	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1	0	0.00%	0	0	0.00%
PUBLIC SERVICES (SLE) 2.10 CASA	Non-Housing Community Development	CDBG: \$15,190.55	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	600	142	23.67%	120	142	118.33%

PUBLIC SERVICES (SLE) 2.11 Food Bank	Non-Housing Community Development	CDBG: \$26,183.80	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1125	456	40.53%	225	456	202.02%
PUBLIC SERVICES (SLE) 2.12	Non-Housing Community Development	CDBG: \$0	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1	0	0.00%	0	0	0.00%
PUBLIC SERVICES (SLE) 2.13	Non-Housing Community Development	CDBG: \$0	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1	0	0.00%	0	0	0.00%
PUBLIC SERVICES (SLE) 2.6 MOW	Non-Housing Community Development	CDBG: \$816.20	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	175	9	5.14%	18	9	50.00%
PUBLIC SERVICES (SLE) 2.7 FLC	Non-Housing Community Development	CDBG: \$10,000	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	100	43	43.00%	25	43	172.00%

PUBLIC SERVICES (SLE) 2.8 RCA	Non-Housing Community Development	CDBG: \$9,787.65	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	100	20	20.00%	20	14	70.00%
PUBLIC SERVICES (SLE) 2.9 Cancelled	Non-Housing Community Development	CDBG: \$0	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	25	0	0.00%	0	0	0.00%

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

CDBG-CV ACTIVITIES – Supporting the Goals in the Consolidated Plan through assistance to households and persons affected by COVID-19

HOUSING NEEDS (HN) 1.6 NB Housing	Homeless	CDBG: \$230,167	Overnight/Emergency Shelter	Unduplicated Persons Sheltered - 188
HOUSING NEEDS (HN) 1.7 CCCC	Homeless	CDBG-CV: \$15,419	Overnight/Emergency Shelter Housing Beds provided	Beds- 441
PUBLIC SERVICES (SLE) 2.10 CASA	Non-Housing Community Development	CDBG-CV: \$55,600	Services for abused and neglected children as a result of COVID-19	Persons Assisted - 27
PUBLIC SERVICES (SLE) 2.11	Non-Housing Community Development	CDBG-CV: \$100,000	Emergency food assistance to households experiencing food	Persons Assisted – 900

Food Bank			insecurity as a result of job loss, reduced work hours and illness due to COVID-19	
PUBLIC SERVICES (SLE) 2.7 FLC & Habitat CCC	Non-Housing Community Development	CDBG & CDBG-CV: \$212,176 CDBG - \$68,923 CDBG-CV - \$143,253	Assistance to households unable to meet the financial obligations of rent and utilities as a result of job loss, reduced work hours and illness due to COVID-19	Persons Assisted - 232
PUBLIC SERVICES (SLE) 2.8 Hope Hospice	Non-Housing Community Development	CDBG-CV: \$122,482	Services to terminally ill persons and their families	Persons Assisted - 708

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.

The City of New Braunfels recognizes the importance of maintaining appropriate performance measurements of its CDBG projects and program. Staff provides management for the CDBG program and monitors activities and projects with developed guidelines that include performance measures to ensure regulatory compliance. The Consolidated Plan and Annual Action Plan also serve as the baseline for measuring program effectiveness. PY 20 which began October 1, 2020, and ended September 30, 2021 was the first year of the 2020-2024 Consolidated Plan for the Community Development Block Grant (CDBG) program. The PY20 activities reflected the highest priorities identified in the Consolidated Plan, how the activities will best meet these identified needs within the City, and are listed as follows:

- Affordable Housing

- Homelessness
- Public Facility and Infrastructure Improvements
- Public Services
- Fair Housing

During PY20, the City of New Braunfels invested Community Development Block Grant (CDBG) funds to provide:

Affordable Housing: The priority was met through the funding of down payment and closing cost assistance for one first-time low-moderate income homebuyer through the Comal County Habitat for Humanity. It was anticipated that eight homebuyers would receive assistance, however, due to construction delays, the high cost of lots, and the lack of volunteers caused by COVID restrictions adversely affected the PY20 goals.

Efforts were made to retain affordable housing stock by funding the Comal County Senior Foundation's minor home repair program which addressed issues of deferred maintenance and accessibility for seven low-income elderly homeowners. During PY20, the City Comal County Habitat for Humanity provided weatherization and aging in place repairs to three low- to mod income homeowners. Village Circle Apartments, a subsidized apartment complex, received CDBG funds for exterior renovations of ten units occupied by low-moderate income households. Repairs included the repair/replacement of exterior trim, doors, and siding and created a more suitable living environment for the tenants.

Homelessness: The City provided CDBG funds to the Family Life Center for their homeless prevention program. During PY20, 53 low-moderate income New Braunfels residents received emergency rent and/or utility assistance to prevent eviction and/or discontinuation of utility services. The City continued to actively participate in the Comal County Homeless Coalition through in-person meetings and then ZOOM meetings once the stay-at-home orders were in place. The City provided CDBG-CV to assist with the opening and on-going activities of the first emergency homeless shelter in New Braunfels.

Public Facilities & Infrastructure Improvements: The City allocated funding for public facilities during the PY20. Funds were used cover the cost of the survey and engineering services for a transitional housing project that is being developed by the Crisis Center of Comal County. When completed, the facility will provide affordable housing to shelter residents as they transitional from the shelter and to increase stability and income.

Public Services: The City allocated 15% of the PY 20 grant to social service agencies that provide services to low-mod income residents of New Braunfels. These funds were used to provide emergency rent and utility assistance, services for abused and neglected children, emergency food assistance, the Meals on Wheels program and mental health counseling services. These agencies provided a variety of supportive services to 683 low-mod income residents of New Braunfels.

Fair Housing: Fair housing information is presented and discussed at all CDBG meetings and during monitoring with subrecipients. The City maintains Fair Housing information on their website and has a Fair Housing officer on staff. There were no Fair Housing complaints filed with the City during PY20.

During PY20, the City also received an additional round of CDBG-CV funding of \$423,819, thereby providing a total of \$666,921 to address the needs created by the pandemic and the restrictions that were placed on businesses and the stay-at-home orders. The City provided the entire grant amount of \$666,921 to public service agencies to address identified needs in the community caused by COVID-19. Using the CDBG-CV funds, the San Antonio Food Bank provided food assistance to 900; rent and utility assistance to 232 were provided by the Family Life Center and Comal County Cares; Hope Hospice received funding for personal protective equipment (PPE) to enable them to safely provide services to 708 clients and to protect the staff; NB Housing Partners used CDBG-CV funds to provide emergency shelter to 188 individuals who were experiencing homelessness and to help mitigate the dangers of exposure to COVID-19; Crisis Center of Comal County used CDBG-CV funds to maintain a separate section of their emergency shelter and obtain hotel rooms as-needed for 203 victims fleeing domestic violence and/or sexual assault who may have been exposed to COVID 19; CASA received CDBG-CV funding to provide services to 27 children who experienced neglect and/or abuse due to the stresses of COVID and quarantine in their families. These programs provided needed services to a total of 1,516 unduplicated New Braunfels residents.

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)

INFORMATION IS DRAFTED AND SUBJECT TO CHANGE PRIOR TO SUBMISSION OF FINAL DRAFT TO HUD.

	CDBG
White	1,792
Black or African American	148
Asian	21
American Indian or American Native	0
Native Hawaiian or Other Pacific Islander	3
Total	1,964
Hispanic	1,158
Not Hispanic	806

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

Narrative

During PY20, subrecipients of CDBG and CDBG-CV funding 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.

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 and CDBG-CV	public - federal	\$1,151,105	\$941,358.62

Table 3 - Resources Made Available

Narrative

The PY20 Action Plan was developed based on committing the entitlement grant of \$413,188 for available programs. An additional amount of \$56,460.30 reflect funds PY19 were unallocated. Total CDBG expenditures during PY20 were \$359,429.67.

The Resources Available also included the CDBG-CV Round 1 and CDBG-CV Round 3 funding of \$666,921. Total expenditures for CDBG-CV funded activities during PY20 were \$581,928.95.

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
City Wide	100	99%	Low Mod Limited Clientele

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 48.92 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 Senior Center's Minor Home Repair program, the Habitat for Humanity's Weatherization and Aging in Place programs and Homebuyers Assistance program are city-wide projects designed to assist low-moderate income homeowners and homebuyers. The most current HUD income guidelines are used for activities ensure that all participants are low-moderate income. The tenants at Village Circle Apartments must meet low-moderate income guidelines in order to be eligible to rent a unit in the complex.

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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 if possible. 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.

CR-20 - Affordable Housing 91.520(b)

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

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	0	0
Number of Non-Homeless households to be provided affordable housing units	5	1
Number of Special-Needs households to be provided affordable housing units	16	7
Total	19	8

Table 5 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	25	43
Number of households supported through The Production of New Units	5	1
Number of households supported through Rehab of Existing Units	16	0
Number of households supported through Acquisition of Existing Units	0	0
Total	46	44

Table 6 – Number of Households Supported

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

Using CDBG-CV funds, the City was able to assist an additional 413 low-moderate households affected by COVID-19 with rental and utility assistance. These numbers are not included in the chart. Total number assisted with CDBG and CDBG-CV rent and utility assistance is 413.

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. The City identified the worst case need as persons with disabilities and the senior population. Both housing rehab programs focused on providing weatherization, accessibility, and aging in place improvements in an effort to allow these residents to maintain living independently.

During PY20, the Comal County Senior Citizens Foundation's Minor Home Repair program exceeded the proposed number of six projects and by completing seven projects. Comal County Habitat for Humanity Rehab program fell short of their goal of eight projects and completed three projects. The City's CDBG staff provided ongoing technical assistance throughout PY20 which allowed the agency to create and implement new best practices by the end of the program year.

Comal County Habitat for Humanity proposed to provide down payment and closing cost assistance to sixteen homebuyers. During PY20, there was one homebuyer assisted. This was mainly due to the cost of lots in the City, the reduction in volunteers due to COVID 19, and the majority of agency-selected project sites were located outside of the City's limits during PY20 and therefore not eligible to be reimbursed by awarded CDBG funding.

Discuss how these outcomes will impact future annual action plans.

The City will work with the housing subrecipients to identify ways to meet contracted goals. During PY20, the City provided technical assistance to subrecipients that were not meeting contracted goals. As per the subrecipient agreement and the supporting CDBG Policies & Procedures, agencies who do not perform at contracted levels not only are at risk of cancellation but also is a factor in determining future CDBG funding. The PY22 CDBG application ranking process for subrecipient grants will be revised to include negative points to the total score for subrecipients who did not meet program goals in previous funding. The number of points will be determined by repeatedly not meeting program goals and the difference between the goals and the actual number served.

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 & CDBG-CV Actual	HOME Actual
Extremely Low-income	1,535	0
Low-income	279	0
Moderate-income	150	0
Total	1,964	0

Table 7 – Number of Households Served

Narrative Information

The projects conducted by the minor home repair programs and homeownership assistance met the definition of the Section 215 definition of affordable housing. PY20 housing projects addressed the needs of the worst case needs by providing the majority of the funding to senior citizens and those with disabilities. The beneficiaries in the three housing programs and the renovations at Village Circle Apartments met the HUD income guidelines for low-moderate income household. Prior to project approval by the City, agencies submit the HUD Income form and third-party documentation of income to the City for review. The median home purchase price according to HUD-FHA Mortgage Limits for Comal County is \$403,360 with 95% of that value being \$363,024. The newly constructed Habitat home had a sales price of \$195,000.

The Minor Home Repair programs limit repairs to \$10,000 or less and minor home repairs, accessibility improvements and weatherization. In reviewing the property values on the Comal County Appraisal District's website, the property values did not significantly increase, and none exceeded 95% of the original purchase price.

The housing programs, funded in PY20, improved accessibility and sustainability for low-moderate income New Braunfels residents through direct housing related minor home repairs, weatherization, and accessibility improvements. One program provided down payment and closing cost assistance to one low-moderate income first-time homebuyer in New Braunfels and two programs provided minor home repairs to 10 low-moderate income homeowners. CDBG funding also assisted with exterior improvements to 10 units in a 50 unit in a subsidized apartment complex where all the tenants meet HUD's low-moderate income guidelines. Homelessness prevention in the form of emergency rent and utility assistance was provided to 53 income eligible New Braunfels resident to prevent eviction and discontinuation of utilities. Client income, race, ethnicity and household head information was collected by all of the programs and entered into IDIS.

CDBG-CV programs also provided rent and utility assistance to 413 eligible New Braunfels residents, safe emergency shelter to 391 adults experiencing homelessness to mitigate the spread of COVID-19 and public services including emergency food assistance to 900 households affected by COVID-19 through job loss, reduction of work hours and illness caused by COVID-19.

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:

The Comal County Homeless Coalition meets monthly to discuss issues and challenges in addressing 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 participate in the Coalition's planning process. Supported in part by CDBG-CV funding, several of the Coalition's service providers were able to collectively open, operate, and provide supportive services within an emergency shelter for adults experiencing homelessness during PY20.

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

In New Braunfels, some agencies provide outreach services for the specific population that they serve, i.e., victims of domestic violence and youth but there are no agencies focusing specifically on outreach. Information regarding services and housing is distributed by local agencies, local churches that operate food pantries, at nonprofit agencies and governmental entities. The City continued to work with agencies that could provide outreach services especially to persons that are unsheltered in the area. The Coalition assesses individual needs through the Point in Time and Housing Inventory enumerations that are conducted every January.

With a focus on homeless prevention, the City and local service providers identified the provision of direct assistance with rent and utilities as well as supportive services to help those potentially at risk of becoming homeless as the key priorities.

First Footings, an emergency shelter for adults, opened in January 2021 in New Braunfels. This is the first emergency shelter located in New Braunfels and is the dedicated work of the City, service and housing providers and the McKenna Foundation. Since opening in January 2021, First Footings has housed 188 unduplicated adults experiencing homelessness. The Comal County Crisis Center operates an emergency shelter for victims of domestic violence and sexual assault. Connections has an emergency shelter and transitional housing program for youth between the ages of 13 to 18. The programs are available for unaccompanied homeless youth and those aging out of foster care. There are two transitional housing development that are underway and have broken ground. One will provide housing for women and children exiting from the domestic violence shelter. The other property will

provide transitional housing to the general population.

The City and Coalition are aware of the lack of housing choice within the City and are committed to working with agencies that are interested in constructing affordable housing or developing a Rapid Re-Housing program. Working with the Coalition, the City will continue to identify agencies in and out of New Braunfels who would be interested in expanding services and housing into the City.

Addressing the emergency shelter and transitional housing needs of homeless persons

A homeless shelter was a high priority identified in the 2020-2024 Consolidated Plan. First Footings, the City's first homeless shelter, was opened in January 2021 in New Braunfels. The City provided CDBG-CV funds to assist with the cost to rent the building and supportive services for its residents. For PY21, the City will provide CDBG funds to assist with the acquisition of a permanent facility. The Comal County Crisis Center operates an emergency shelter for victims of domestic violence and sexual assault and has a transitional housing project underway. Connections has an emergency shelter and transitional housing program for youth between the ages of 13 to 18. The programs are available for unaccompanied homeless youth and those aging out of foster care. There are two transitional housing development that are underway and have broken ground. One will provide housing for women and children exiting from the domestic violence shelter. The other property will provide transitional housing to the general population.

The San Antonio Food Bank continues the construction of Appleseed Apartments and The Family Housing Trust Program, a transitional housing program including a \$9 million, 51-unit apartment complex located next to the New Braunfels Food Bank. A groundbreaking ceremony for the Apple Seeds Apartments took place in June 2021, construction is anticipated to be completed within a year, and open to accept residents in the fall of 2022. A Food Bank case manager and community partner sponsor will facilitate a custom program plan created by the participant for up to 36 months. The framework will center around wage development, budgeting, skills training, self-sufficiency, and social capital. Regular milestone check-ins and progression status reports will assist in the successful completion of each family's program. Successful program graduation each family with a Housing Trust will be awarded up to \$10,000 to go towards permanent housing in New Braunfels. The Trust coupled with increased wages and/or skills should allow families that were previously unable to afford to live in New Braunfels to thrive with assets and savings. The amount of Trust awarded will depend on the length and details of each family's program.

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

The City is aware of the lack of affordable housing choices within the City and are committed to working with agencies that are interested in constructing affordable housing or developing a Rapid Re-Housing or transitional housing programs. First Footings emergency shelter provides intensive case management and access to supportive services to provide housing stability once a person leaves the shelter. With limited affordable housing options, it is difficult to find stable housing for persons who were homeless. Working with the Coalition, the City will continue to identify agencies in and out of New Braunfels who would be interested in expanding services and housing into the City. The City continues to focus limited resources on homeless prevention activities and will fund a transitional housing project for victims of domestic violence and sexual assault and provide funding for the First Footing homeless shelter.

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.

The Next Step Project launched on September 1, 2021, a collaborative effort between NB Housing Partners, Hill Country MHDD and the Crisis Center of Comal County. The Next Step project is providing rapid re-housing and supportive services for those who are exiting homelessness. The biggest challenge facing this project is the lack of affordable rental units.

During PY20 and previous program years, the City has allocated CDBG funding to agencies that provide services and housing to the homeless populations including NB Housing Partners (emergency shelter for homeless adults), Family Promise (emergency shelter for families), Comal County Crisis Center (domestic violence shelter), San Antonio Food Bank, The Salvation Army, the Family Life Center, 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 City used the CDBG-CV funds provided by the CARES Act to assist households that were affected by COVID-19. Of the seven projects that were funded, there were two homeless prevention projects that provided emergency rent/mortgage and utility assistance in order to prevent eviction or utility discontinuation; one project that allowed the domestic violence shelter to set up a quarantine space and to house clients in hotels if the quarantine space at the shelter was full; an emergency homeless shelter for adults; emergency food assistance; and funding for PPE to continue to safely provide service to terminally ill clients and their families.

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

Actions taken to address the needs of public housing

The New Braunfels Housing Authority has 170 public housing units in New Braunfels that are owned by the Housing Authority. The Housing Authority also owns a high-rise elderly/disabled complex with 100 units and 35 duplexes for larger families. The Housing Authority provides 242 vouchers through the Housing Choice Voucher program.

The City of New Braunfels and the Housing Authority continue to identify ways to provide affordable rental units and increase homeownership for public housing residents. The City did not have any direct CDBG funded activities with the New Braunfels Housing Authority in PY20.

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

NBHA is managed by a five-person Board of Commissioners with each Commissioner being appointed by the Mayor and functions in a similar way as the Board of Directors of major corporations. One Commissioner must be a resident of Laurel Plaza, or Villa Serena or an active participant in the Section 8 program. Each commissioner brings their own professional expertise and point of view to provide direction for the NB Housing Authority.

New Braunfels Housing Authority also 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 City will continue to support efforts to coordinate the work of social service organizations such as the Food Bank, Family Life Center, and Habitat for Humanity that provide services, housing assistance and homeownership opportunities to public housing residents. Comal County Habitat for Humanity held information sessions and application assistance for public housing residents for the agency's homeownership program. The San Antonio Food Bank provided a mobile food pantry for the residents residing in a housing authority property.

Actions taken to provide assistance to troubled PHAs

The New Braunfels Housing Authority is not a troubled PHA.

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 City's 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.

The City will continue to monitor its policies regarding code enforcement, development costs and housing inspections to ensure equal access for all underserved residents. Another significant 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 PY20, the City continued to work with the Comal County Habitat for Humanity to assist low-income homebuyers obtain housing. Additionally, Habitat for Humanity and the Comal County Senior Citizens Foundation had minor home repair, weatherization and aging in place programs to improve the quality of housing for low-moderate income homeowners and to assist elderly homeowners with accessibility improvements allowing them to remain in their homes

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 Grants Coordinator actively sought funding opportunities in order to stretch limited general fund and CDBG dollars.

In addition to CDBG funding, the City provided \$666,921 of CDBG-CV funding seven subrecipients. Funds were used to assist households affected financially by COVID-19 with rent and utility assistance to prevent eviction; additional services to children affected by COVID-19; PPE equipment for the safe delivery of services to terminally ill New Braunfels residents by Hope Hospice, and emergency shelter to

adults experiencing homelessness and victims of domestic violence and/or sexual assault.

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

Lead-based paint hazard identification and reduction strategies include education, outreach, and conformance with 24 CFR Part 35 regulations. The City distributes and maintains 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. The City funds a minor home repair program and a housing rehab program through subrecipient agencies. Lead-based paint information is included in the application package and agency staff discusses lead-based paint issues with the applicants.

The City coordinates 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 continue to require lead-testing from qualified lead inspectors for proposed housing projects for housing built prior to 1978 in which the household includes children aged five 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)

New Braunfels addresses the problem of poverty through its strategic goals. Through a holistic approach that combines safe, decent affordable housing for low- to moderate-income families with social services, education, access to health and employment, the City strives to reduce the poverty rate. The City, as lead agency in the implementation of the Consolidated Plan, coordinated with local organizations to ensure that goals are met and will continue to provide assistance to agencies that provide services to poverty-level households.

Actions taken during PY20 were:

- San Antonio Food Bank provided emergency food assistance to 456 New Braunfels residents as well as providing a mobile pantry at the Westside Community Center and the New Braunfels Housing Authority.
- CASA provided advocacy and case management services to 142 abused and/or neglected children.
- River City Advocacy provided individual and group mental health counseling to 14 low-moderate

income New Braunfels residents.

- Comal County Senior Citizens' Meals on Wheels program provided hot home delivered meals to 18 low-moderate income seniors.
- The Family Life Center provided 43 low-moderate income residents of New Braunfels with emergency rent and/or utility assistance in order to prevent eviction and discontinuation of utility services.
- Comal County Senior Citizens Foundation provided minor home repairs and accessibility improvements to seven low-moderate income elderly homeowners.
- Comal County Habitat for Humanity provided weatherization and Aging in Place improvements to three low-moderate income homeowners.
- Habitat for Humanity provided down payment and closing cost assistance to one first-time low-moderate income homebuyer.

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

During PY20, the City continued to make CDBG and CDBG-CV 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 desk review monitoring 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 PY20 Annual Action Plan involved a variety of agencies and City departments.

Collaboration and coordination between agencies are important to ensuring that the needs in the community are addressed. Stakeholder meetings were held during PY19 to assistance in the development of the PY20 Action Plan. Due to COVID restrictions, the City had regular contact with agencies through emails, telephone and conference calls, Teams and ZOOM meetings and by the end of PY20 was beginning to have in-person meetings again. The City worked with the Comal County Homeless Coalition and the member agencies by attending ZOOM meetings. Due to these efforts, the first emergency shelter for adults experiencing homeless was opened and plans for a more permanent facility were developed and will receive CDBG funding for acquisition during PY21.

Agencies provided information on housing and service needs and identified gaps in both categories as well as fair housing issues and the needs of low-moderate area within the City. 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 – minor home repair and 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
- 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
- River City Advocacy – mental health services
- Village Circle Apartments – a rent assisted multifamily apartment complex providing housing to low-moderate households.
- NB Housing Partners – emergency shelter and supportive services for homeless adults

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 of New Braunfels' policies are reasonable, and the development regulation process generally runs smoothly during PY20. As specific projects were proposed, the City reviewed the project for its compliance with existing local laws and regulations. If a local law or regulation should prove to have a negative impact on a proposed affordable housing program or project, such law or regulation would be reviewed to determine its viability.

The City acknowledges that there is a shortage of affordable rental housing. The shortage of viable land for large-scale apartments and the cost for available parcels results in a market that does not support multi-family developers without a form of subsidy. The City does review and approve, when viable, Low Income Housing Tax Credit applications to the State of Texas. However, without HOME funding and a small CDBG allocation, the City does not have the ability to finance affordable housing by developers. The City continues to seek alternate funding opportunities and options for affordable housing.

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 PY20.

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

The City monitors its own performance to ensure it is meeting the goals and objectives as set forth in the Consolidated Plan and Annual Action Plan. Program and subrecipient files are reviewed at least once per quarter to ensure that the information was accurate and current. This information is transferred into the IDIS system that allows HUD to track the City's performance as well.

Staff monitors to ensure that Federal labor standards, bidding and contract requirements are met when a project is required to implement Davis-Bacon and that small, minority, and/or women owned businesses are included when bids are necessary in the expenditure of its CDBG grant. The City's Purchasing Department provides a list of minority and women owned businesses to subrecipients when bids are required for CDBG projects. Subrecipient agencies have a Section 3 clause in their contracts with the City. Section 3 requirements are discussed in application workshops and at the contract signing. Subrecipients are required to track this information and submit a Section 3 report for employees and contractors, or vendors involved in CDBG projects. The City is in the process of developing a Section 3 policies and procedures plan in compliance with the new Section 3 regulations.

Ongoing Compliance and Monitoring:

Projects proposed for PY20 funding by eligible organizations were reviewed by staff for compliance with eligibility requirements, national objectives, and the Consolidated Plan and City Council guidelines prior to being reviewed by the Community Development Advisory Committee (CDAC). CDAC is responsible for making funding recommendations to City Council.

Prior to issuing reimbursement for any goods or services, the City verified that the goods or services have been provided according to specific program requirements and that all relevant documentation was submitted to the City.

Subrecipient Monitoring:

City staff monitors each subrecipient of CDBG funds for compliance with CDBG rules and regulations. Each subrecipient had an executed Subrecipient Contract with the City that detailed HUD rules and regulations, performance objectives, long-term compliance requirements, the scope of the funded program and the CDBG grant amount. The City also provides each subrecipient with a copy of the CDBG Policies and Procedures which is also posted on the City's website.

The City uses 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 provided beneficiary data, project progress reports, and financial information to support reimbursement requests. City staff maintained contact with the subrecipients on a regular basis and was available for technical assistance if requested or if the need was identified from monthly reports.

All subrecipients receive at least one on-site monitoring visit during the Program Year and technical assistance meetings as needed. The City also performs monthly desk reviews utilizing the monthly reports, reimbursement requests and beneficiary information.

For on-site monitoring, subrecipients are notified via letter and provided with a list of items that will be reviewed. The letter includes information that City staff will need to review as well as any particular staff person that needs to be available to answer questions. If there are any findings during the monitoring visit, they will be included in a letter to the subrecipient, with expected outcomes and the time frame to correct all monitoring findings or concerns.

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 1, 2021, through November 15, 2021. The public hearing was held at New Braunfels City Hall at a regularly scheduled City Council meeting on November 8, 2021, 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 13, 2021.

No public comments were received or expressed at the public hearing. **(INFORMATION IS DRAFTED AND SUBJECT TO CHANGE PRIOR TO SUBMISSION OF FINAL DRAFT TO HUD.)**

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 PY20. The City does not have an existing Section 108 loan.

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

No

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

N/A