



**CONSOLIDATED ANNUAL
PERFORMANCE EVALUATION
REVIEW
PROGRAM YEAR 2019**

EXECUTIVE SUMMARY
CITY OF NEW BRAUNFELS, TEXAS
CONSOLIDATED ANNUAL PERFORMANCE AND EVALUATION REPORT
PROGRAM YEAR 2019

The City of New Braunfels received \$393,910 in Community Development Block Grant (CDBG) funds for the Program Year 2019 (PY19) from the U.S. Department of Housing & Urban Development (HUD). CDBG funds were allocated to public service activities, public facilities, housing activities, and administration.

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

The City obligated 20% (\$78,782) of the total allocation for PY19 to Program Administration and 15% (\$59,086.50) to Public Services. These amounts are capped at these percentages by federal regulations and based on the current program year grant. The remaining \$256,041.50 funds were available to fund housing and public facility improvement projects. Funding requests for these activities were \$216,278 leaving a balance of \$39,743.50 for PY19 funds and \$100,175.90 from previous years for a total of \$139,919.40. Of these funds, \$68,923 was allocated to CDBG-CV projects and \$63,975 to PY20 projects.

Funded Projects for PY19 were:

- Public Services
 - CASA of Central Texas: \$13,333
 - San Antonio Food Bank: \$12,500
 - Comal County Senior Citizens Foundation – Meals on Wheels Program: \$17,935
 - Family Life Center: \$10,318
 - River City Advocacy: \$5,000
- Housing
 - Comal County Habitat for Humanity – Closing Costs Assistance: \$8,500
 - Comal County Habitat for Humanity – Home Repair Program: \$65,798
 - Comal County Senior Citizens Foundation – Minor Home Repairs: \$80,000
- Public Facilities and Parks Improvements
 - Westside Community Center – Lighting Improvements: \$12,000
 - Westside Community Center – Roof Replacement: \$50,000

Using CDBG funding, a total of 594 unduplicated low-moderate income residents of New Braunfels benefitted from a public service activity; 11 low-income owner-occupied households received minor home repairs, weatherization and accessibility improvements to their homes; and three first time low-moderate income homebuyers received closing cost assistance.

CDBG-CV

On April 2, 2020, the City of New Braunfels received notification of a special allocation from the U.S. Department of Housing and Urban Development's Community Development Block Grant (CDBG) funds that was used to prevent, prepare for, and respond to the coronavirus (COVID-19). This allocation was authorized by the Coronavirus Aid, Relief, and Economic Security Act (CARES Act), Public Law 116-136 to respond to the growing effects of this historic public health crisis.

The CARES Act provided \$243,102 in Community Development Block Grant Coronavirus (CDBG-CV) funds to the City. CDBG-CV funds were allocated through a competitive process to agencies for activities that met a national objective and supported the unique needs of low- and moderate-income persons who have been affected by COVID-19. Additionally, unallocated funds from PY19 in the amount of \$68,923 were used to support CDBG-CV projects for a total of \$312,025 available CDBG-CV projects. Projects funded were:

- CASA of Central Texas: \$55,600
- Comal County Crisis Center: \$10,000
- Comal County Habitat for Humanity: \$136,425
- Family Life Center: \$10,000
- San Antonio Food Bank: \$100,000

The CDBG-CV contracts between the City and the agencies were signed on July 27, 2020. As of September 30, 2020, 147 New Braunfels residents had received rental, mortgage and utility assistance.

Information Contained in PY19 CAPER

The PY19 CAPER includes the following components:

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

CR-05 - Goals and Outcomes

Progress the jurisdiction has made in carrying out its strategic plan and its action plan. 91.520(a)

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 and is reported in the Consolidated Annual Performance and Evaluation Report (CAPER) required by HUD for each Program Year funding allocation. PY 19 which began October 1, 2019 and ended September 30, 2020 was the final year of the 2015-2019 Consolidated Plan for the Community Development Block Grant (CDBG) program. The PY19 activities addressed some of the priorities listed in the 2015-2019 Consolidated Plan. These activities reflected the policies and programs that will best meet the needs within the City, and are listed as follows:

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

The COVID-19 stay-at-home orders prohibited the face to face meetings, focus groups, interviews and neighborhood meetings that are usually held in order to solicit information. The City held a Stakeholders meeting, a public hearing to discuss the needs, priorities and gaps in service and a public hearing

Over the past program year, the City of New Braunfels pursued the goals and objectives outlined in the PY19 Annual Action Plan and the PY 2015-2019 Consolidated Plan. During PY19, the City of New Braunfels invested Community Development Block Grant (CDBG) funds to provide:

Public Services: The City allocated 15% of the PY 19 CDBG grant to social service agencies that provide services to low-moderate 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 for the delivery of nutritious meals to senior citizens, and mental health counseling services. These agencies provided a variety of supportive services to 594 low-moderate income residents of New Braunfels.

Decrease Homelessness: The City provided CDBG funds to the Family Life Center for their homeless prevention program. During PY19, 114 low-moderate income 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, and was involved in the cold weather shelter again during PY19.

Increase Affordable Housing: The priority was met through the funding of closing cost assistance for three first-time low-moderate income homebuyers through the Comal County Habitat for Humanity. It was anticipated that eight homebuyers would receive assistance, however, due to construction delays and the lack of volunteers caused by COVID restrictions adversely affected the PY19 goals; it is not possible to close on a home when it has not yet completed construction.

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 six low-income elderly and/or disabled homeowners. During PY19, the City funded a new program for Comal County Habitat for Humanity which provided weatherization and aging in place repairs to low- to moderate-income homeowners. The programs provided assistance to 11 low-moderate income homeowners and three first-time home buyers.

Public Facilities & Infrastructure Improvements: The City allocated funding for public facilities during the PY19. Funds were used for improvements to indoor and outdoor lighting, and to replace the deteriorated roof of the Westside Community Center. Westside Community Center is located in a low-moderate income census tract and provides recreational and educational programs for neighborhood residents. Activities are available for children, youth, adults and seniors. A branch library is also located at the Westside Community Center.

Fair Housing: The City did not fund any fair housing projects during PY19. The City's Fair Housing Plan was updated during the development of the 2020-2024 Consolidated Plan. A survey, public hearings and a stakeholder meeting were used to solicit input on fair housing issues from stakeholders and city residents. Fair housing information is presented and discussed at all CDBG meetings and also 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 PY19.

CDBG-CV

On April 2nd, the City of New Braunfels received notification of a special allocation from the U.S. Department of Housing and Urban Development's Community Development Block Grant (CDBG) funds that was used to prevent, prepare for, and respond to the coronavirus (COVID-19). This

allocation was authorized by the Coronavirus Aid, Relief, and Economic Security Act (CARES Act), Public Law 116-136 to respond to the growing effects of this historic public health crisis.

The CARES Act provided \$243,102 in Community Development Block Grant Coronavirus (CDBG-CV) funds to the City. The City’s goal was to provide assistance to New Braunfels residents who were impacted by COVID-19. CDBG-CV funds were allocated through a competitive process to agencies for activities that support the unique needs of low- and moderate-income persons who have been affected by COVID-19. Additionally, unallocated funds from PY19 in the amount of \$68,923 were used to support CDBG-CV projects for a total of \$312,025 available CDBG-CV projects. Projects funded were:

- CASA of Central Texas: \$55,600 for advocacy services for children removed from their living environments due to COVID-related abuse and neglect
- Comal County Crisis Center: \$10,000 for emergency housing and food assistance for victims of domestic violence
- Comal County Habitat for Humanity: \$136,425 for housing and utility assistance
- Family Life Center: \$10,000 for rent and utility assistance
- San Antonio Food Bank: \$100,000 for food assistance

The CDBG-CV contracts between the City and the agencies were signed on July 27, 2020. As of September 30, 2020, 147 New Braunfels residents had received rental, mortgage, and utility assistance or been provided with emergency shelter due to family violence.

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

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

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Affirmatively Further Fair Housing	Program Administration	CDBG: \$	Other	Other	500	400	80%	50	50	100%

Community and Economic Development	Non-Housing Community Development	CDBG: \$	Facade treatment/business building rehabilitation	Business	10	0	0.00%	0	0	100.00%
Community and Economic Development	Non-Housing Community Development	CDBG: \$	Jobs created/retained	Jobs	10	0	0.00%	0	0	100.00%
Community and Economic Development	Non-Housing Community Development	CDBG: \$	Businesses assisted	Businesses Assisted	10	0	0.00%	0	0	100.00%
Decrease Homelessness	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	100	0	0.00%	0	0	100.00%
Decrease Homelessness	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	50	57	114%	16	11	69%

Decrease Homelessness	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Homeless Person Overnight Shelter	Persons Assisted	100	0	0.00%	0	0	100.00%
Decrease Homelessness	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	25	0	0.00%	0	0	100.00%
Decrease Homelessness	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Homelessness Prevention	Persons Assisted	100	371	371%	20	114	570%

Decrease Homelessness	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	CDBG: \$	Housing for Homeless added	Household Housing Unit	25	0	0.00%	0	0	100.00%
Historic Preservation	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	100	8081	808%	650	650	100.00%
Historic Preservation	Non-Housing Community Development	CDBG: \$	Buildings Demolished	Buildings	10	0	0.00%	0	0	100.00%
Historic Preservation	Non-Housing Community Development	CDBG: \$	Housing Code Enforcement/Foreclosed Property Care	Household Housing Unit	10	0	0.00%	0	0	100.00%
Increase Affordable Housing	Affordable Housing	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	50	717	1,434%	463	594	128%
Increase Affordable Housing	Affordable Housing	CDBG: \$	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	50	0	0.00%	0	0	100.00%
Increase Affordable Housing	Affordable Housing	CDBG: \$	Homeowner Housing Added	Household Housing Unit	0	0	0.00%	0	0	100.00%

Increase Affordable Housing	Affordable Housing	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	50	57	114%	16	11	69%
Increase Affordable Housing	Affordable Housing	CDBG: \$	Direct Financial Assistance to Homebuyers	Households Assisted	50	20	40%	8	3	38%
Increase Affordable Housing	Affordable Housing	CDBG: \$	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	20	0	0.00%	0	0	100%
Increase Affordable Housing	Affordable Housing	CDBG: \$	Homelessness Prevention	Persons Assisted	100	257	257.00%	20	114	570%
Increase Affordable Housing	Affordable Housing	CDBG: \$	Housing for Homeless added	Household Housing Unit	20	0	0.00%	0	0	100%
Public Facility and Infrastructure Improvements	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1000	8081	808%	650	650	100.00%
Public Facility and Infrastructure Improvements	Non-Housing Community Development	CDBG: \$	Homeless Person Overnight Shelter	Persons Assisted	0	664	664.00%	0	0	100.00%
Public Facility and Infrastructure Improvements	Non-Housing Community Development	CDBG: \$	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	0	0	0.00%	0	0	100.00%

Public Facility and Infrastructure Improvements	Non-Housing Community Development	CDBG: \$	Buildings Demolished	Buildings	10	0	0.00%	0	0	100.00%
Public Facility and Infrastructure Improvements	Non-Housing Community Development	CDBG: \$	Housing Code Enforcement/Foreclosed Property Care	Household Housing Unit	10	0	0.00%	0	0	100.00%
Public Services	Public Services	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1000	3160	316%	495	594	128%
Public Services	Public Services	CDBG: \$	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	50	0	0.00%	0	0	100.00%
Public Services	Public Services	CDBG: \$	Homeless Person Overnight Shelter	Persons Assisted	0	664	664.00%	0	0	100.00%

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

Assess how the jurisdiction’s use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan, giving special attention to the highest priority activities identified.

There are a number of unmet goals from the current Consolidated Plan. In the current Consolidated Plan there were goals and outputs included for activities that the City did not have sufficient funding or capacity to undertake. During the process to develop the new Consolidated Plan in PY19, the City developed goals only for activities and projects that are feasible for a 5-year plan based on the estimated amount of CDBG funding

the City will receive during the next five years.

Priorities that were met during PY19 were the funding of supportive services for low-moderate income residents; minor home repairs and accessibility improvements that allowed elderly homeowners to “age in place” and improved their living conditions; homeownership assistance and improved recreational and educational facility.

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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)

IDIS GENERATED CHART	CDBG
White	401
Black or African American	47
Asian	0
American Indian or American Native	0
Native Hawaiian or Other Pacific Islander	2
Total	450
Hispanic	165
Not Hispanic	285

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

Narrative

During PY19, the subrecipients were required to submit monthly performance and beneficiary reports. Information on the racial and ethnic status of the individual, families or households assisted was entered into IDIS.

The above chart does not accurately reflect the number of beneficiaries for PY19. The total beneficiaries is for Public Service activities was 594 individuals. Housing activities count households and not individuals. In PY19, 11 households were assisted with minor home repairs, weatherization and accessibility improvements. Three first-time homebuyers were assisted with closing costs. The chart below reflects only the Public Service activities beneficiaries and the statistics have been verified by agency reports and the PR03.

ACTUAL PY19 BENEFICIARIES	CDBG
White	526
Black or African American	43
Asian	0
American Indian or American Native	0
Native Hawaiian or Other Pacific Islander	1
Black/African American & White	8
Multi-Racial	16
Total	594
Hispanic	250
Not Hispanic	344

The PR23 includes the beneficiary data for the Salvation Army which was a PY18 project. Their beneficiary numbers were reported in the PY18 CAPER and should be excluded from the totals in the PR23 for PY19.

COMPARISON BETWEEN ACTUAL PUBLIC SERVICE NUMBERS & PR23 REPORT	PY19	PR23
White	526	643
Black or African American	43	66
Asian	0	1
American Indian or American Native	0	0
Native Hawaiian or Other Pacific Islander	1	1
Black/African American & White	8	8
Multi-Racial	16	30
Total	594	749
Hispanic	250	311
Not Hispanic	344	438

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CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	\$533,829.40	\$323,683.89

Table 3 - Resources Made Available

Narrative

The PY19 Action Plan was developed based on committing the entitlement grant of \$393,910 for available programs. An additional amount of \$139,919.40 reflect funds from current program year that were unallocated and previous program years that were recaptured and available to commit to new projects. There were several subrecipients that did not expend all of their grant funds. Total expenditures during PY19 were \$323,683.89.

Identify the geographic distribution and location of investments

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

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 income guidelines set for activities ensure that all participants are low-moderate income. At the Westside Community Center, a city-owned property, projects were determined by census information and are located in low-moderate income areas.

Leveraging

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

Although CDBG requires no match, subrecipients of CDBG funding from the City of New Braunfels were expected to leverage the CDBG funds with other private, state or local funds 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. Of the Public Service projects funded, CDBG funds accounted for 4.60% of the total amount of \$1,285,975.

The City used CDBG funds to improve public facilities that are city owned and located in low-moderate income areas. The two projects at Westside Community Center, a city facility, for PY19 were installation of upgraded interior and exterior lighting and the replacement of the roof. Westside Community Center provides educational and recreational programs for seniors, children/youth and English As A Second Language classes. These two projects supported the Public Facility and Infrastructure Improvements priority as identified in the Con Plan.

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	0	0
Number of Special-Needs households to be provided affordable housing units	0	0
Total	0	0

Table 5 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	20	114
Number of households supported through The Production of New Units	8	3
Number of households supported through Rehab of Existing Units	16	11
Number of households supported through Acquisition of Existing Units	0	0
Total	44	128

Table 6 – Number of Households Supported

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

Providing housing assistance proved to be a challenge

The City maintained a strong commitment to preserving the existing supply of affordable housing, as well as increasing the availability of affordable housing opportunities through funding minor repair and homeownership programs. During PY19, the Comal County Senior Citizens Foundation's Minor Home Repair program fell short of their goal of eight projects and completed six projects. Comal County Habitat for Humanity Rehab program also fell short of their goal of eight projects and completed five projects. Both agencies reported that this was due to mainly to the restrictions and stay at home orders due to COVID-19 which stopped projects for several months and delayed the planned start date for projects.

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

Comal County Habitat for Humanity proposed to provide closing cost assistance to eight new homebuyers and while the agency expended all of the awarded funds, there were only three homebuyers assisted. This was due to the increase in closing costs for each homebuyer and the restrictions of COVID-19.

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 the COVID-19 pandemic. Homeowners were reluctant to have contractors in their homes and the volunteer base for the Habitat homeownership program was severely affected by COVID-19. Based on past experiences and the impact that projects can have on timeliness requirements, the City will fund public facility projects that are “shovel ready”. The City worked with the Comal County Senior Citizens Foundation and the Comal County Habitat for Humanity to develop policies and procedures and outreach plans that informed the public of the programs and also with Comal County Habitat for Humanity to identify affordable lots for their home builds. Failure to meet contractual goals is a factor in determining future CDBG funding. The CDBG application for subrecipients has been revised to include a detailed timeline for all projects.

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.

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

Number of Households Served	CDBG Actual	HOME Actual
Extremely Low-income	1	N/A
Low-income	8	N/A
Moderate-income	2	N/A
Total	11	N/A

Table 7 – Number of Households Served

Narrative Information

Three programs, funded in PY19, 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 closing cost assistance to three low-moderate income first-time homebuyers in New Braunfels. Homelessness prevention in the form of emergency rent and utility assistance was provided to 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 are providing rent and utility assistance to households affected by COVID-19 through job loss, reduction of work hours and illness caused by COVID-19.

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CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)

Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through:

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

The restrictions of COVID-19 affected the City and agencies ability to conduct outreach. During PY19, the Comal County Homeless Coalition met monthly either in person or through ZOOM meetings to discuss issues and challenges in meeting the needs of those experiencing homelessness or at-risk of homelessness. Members of the Coalition represent service and housing providers, public housing staff, emergency services such as The Salvation Army, the McKenna Foundation, special needs populations and City staff from the Police Department, the Westside Community Center and the CDBG program participated in the Coalition's planning process. The Comal County Homeless Coalition is part of the Texas Balance of State Continuum of Care and is managed by the Texas Homeless Network (THN), a statewide nonprofit agency.

The City held a stakeholder meeting on March 4, 2020 to discuss and identify priorities for those experiencing homelessness. The meeting was held at New Braunfels City Hall. Outreach included public notice in local newspaper, the City's website, flyers posted by the agencies and email invitations to agencies that provide services to people experiencing homelessness. 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 to all of the homeless population. Information regarding services and housing is distributed by local agencies, local churches that operate food pantries, at nonprofit agencies and governmental entities. The City will continue to work with agencies that could provide outreach services especially to persons that are unsheltered in the area. The Coalition assessed individual needs through the Point in Time and Housing Inventory enumerations that are conducted every January. PY19 goals that were accomplished are:

- The continuation of the winter shelter;
- Two agencies are developing transitional housing properties which will provide 67 new units of transitional housing;
- The Coalition continued to discuss plans to develop a homeless shelter and to identify a location, funding source for construction or rehabilitation and operations.
- The Comal County Crisis Center developed a quarantined section of the emergency shelter in order to assist victims of domestic violence resulting from COVID-19.

Addressing the emergency shelter and transitional housing needs of homeless persons

With a focus on homeless prevention, the City and local service providers have 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. CDBG and CDBG-CV provided funding to agencies for rent and utility assistance in order to prevent eviction and/or utility discontinuation.

The Comal County Homeless Coalition conducted a Point-In-Time in January 23, 2020 in an effort to identify the number of persons experiencing homelessness in Comal County. City staff from CDBG and Westside Community Center participated in the Point-in-Time count. Efforts were directed at locating people who were unsheltered. The 2020 PIT count identified 38 adults and eight children with 11 of the adults meeting the definition of chronically homeless. Of those surveyed 11 reported as having a serious mental illness; four reported having substance use disorders; 12 reported as survivors of domestic violence and one reported as having HIV/AIDS.

The City held a stakeholder meeting on March 4, 2020 to discuss and identify priorities for those experiencing homelessness. The meeting was held at New Braunfels City Hall. Outreach included public notice in local newspaper, the City's website, flyers posted by the agencies and email invitations to agencies that provide services to people experiencing homelessness. The Comal County Homeless Coalition worked to find way to provide more intensive outreach to those experiencing homelessness. There are no agencies in New Braunfels that provide only outreach activities, however, many agencies provide outreach to the specific population that they serve. The City uses CDBG funds to support these agencies. These agencies include but are not limited to the Comal County Crisis Center, Family Promise, Family Life Center, San Antonio Food Bank, Comal County Senior Citizens Foundation, the Salvation Army, CASA, and Habitat for Humanity. Additionally, city staff presented information about the development of the Consolidated Plan at a coalition meeting.

The Salvation Army regularly conducted outreach activities and offered programs that provided meals and other supplies for families that are experiencing homeless and those who are at risk of homelessness. The San Antonio Food Bank (New Braunfels location) has mobile vans that regularly distributed food in low income neighborhoods and at various agencies in the community as well as at New Braunfels Food Bank.

New Braunfels & Comal County ISDs have Homeless Liaisons that assisted homeless and at risk homeless students and worked closely with the appropriate agencies to secure services. Efforts were significantly impacted due to COVID-19. However, the Homeless Liaisons continued to verify and track homeless students; coordinated services for homeless students; provided supplies and materials; and assisted agencies such as the Comal County Crisis Center, Family Promise and CASA with school enrollment and virtual learning for children receiving services or residing in emergency shelter.

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

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

Three agencies provided emergency shelter for specific homeless populations in New Braunfels. The Comal County Crisis Center operated an emergency shelter for victims of domestic violence and sexual assault and their children. Connections provided emergency shelter and transitional housing for youth aging out of foster care and unaccompanied homeless youth. Family Promise provided emergency shelter to families experiencing homelessness. All agencies have received CDBG funding either in PY19 or in previous years.

The City and the Comal County Homeless Coalition continued to discuss ways to fund and manage an emergency shelter and supportive housing programs. For the second year in a row, the Comal County Homeless Coalition opened and supported the City's Cold Weather shelter for homeless residents when temperatures dropped below freezing for several days this past winter. A task force has worked within the Coalition to further develop processes and procedures for the Cold Weather shelter and also to research other shelter opportunities offered by similar-sized cities.

Transitional housing, Rapid Re-Housing and permanent supportive housing are recognized as an unmet need in New Braunfels. NB Housing Partners continues to develop a transitional housing project in New Braunfels. The 43-unit complex will provide housing and services for individuals and families exiting from emergency shelters or other service programs. The City of New Braunfels provided funding (non-CDBG) for the purchase of the land for this project. The Comal County Crisis Center is developing transitional housing for women and children who are victims of domestic violence and have been residing in the emergency shelter. The project is in Phase I as of November 2020.

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

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

During PY19 and previous program years, the City has allocated CDBG funding to agencies that provide services and housing to the homeless populations including Family Promise (emergency shelter for

families), Comal County Crisis Center (DV shelter), San Antonio Food Bank, The Salvation Army, 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 (CARES Act) to assist households that were affected by COVID-19. Of the five 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 and 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.

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

Introduction

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.

Actions taken to address the needs of public housing

Due to COVID-19 restrictions, the City of New Braunfels and the Housing Authority were not able to meet to further identify ways to provide affordable rental units and increase homeownership for public housing residents or to hold group meetings for public housing residents. The City did not have any direct CDBG funded activities with the New Braunfels Housing Authority in PY19.

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

New Braunfels Housing Authority encouraged the residents to be more involved in Resident Council meetings by providing the residents the opportunity to learn about the activities, security, modernization projects and management issues and provide input and feedback. The New Braunfels Housing Authority has finalized the appointment of a new Executive Director and rehab and renovation work has begun on some of the public housing units.

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 City has supported Habitat's efforts by providing CDBG closing costs assistance for the past six years. Habitat received \$8,500 from CDBG for closing costs assistance during PY19.

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.

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

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

The City will continue to monitor its policies regarding code enforcement, development costs and housing inspections to ensure equal access for 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 PY19, 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 reduce lead-based paint hazards. 91.220(k); 91.320(j)

The City distributed and maintained documentation of required information for homes built before 1978, including the EPA Lead-based Pamphlet, Notification of Lead Hazard Evaluation, and Notification of Lead Hazard Reduction. In PY19 the City funded a minor home repair through a subrecipient agency. Lead-based paint information is included in the application package and agency staff discusses lead-based paint issues with the applicants.

The Minor Home Repair program managed by the Comal County Senior Citizen Foundation and the

Weatherization and Aging in Place programs managed by the Comal County Habitat for Humanity provided a Lead-Based Paint Hazards brochure to all applicants and maintained a signed certification that the applicant received in the information in the client file. If a household has children under the age of 6, the Comal County Senior Citizen Foundation and the Comal County Habitat for Humanity, in collaboration with the City, will conduct a lead-based paint inspection and decide on a case-by-case basis if the lead-based paint issues can be addressed and repairs completed within the funding limits established by the program guidelines.

During PY19, the City coordinated 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 required lead-testing from qualified lead inspectors for proposed housing projects for housing built prior to 1978 in which the household includes children aged 6 or under. There were projects completed in PY19 that had children age 6 and under residing in the household.

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 PY19 were:

- Comal County Senior Citizens Foundation - Meals on Wheels program provided 42 elderly residents with a hot nutritious meal Monday through Friday. Food for the week-end is also delivered with the Friday meal.
- San Antonio Food Bank provided emergency food assistance to 248 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 158 abused and/or neglected children.
- River City Advocacy provided individual and group mental health counseling to 28 low-moderate income New Braunfels residents.
- The Family Life Center provided 114 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 six low-moderate income elderly homeowners.
- Comal County Habitat for Humanity provided weatherization and Aging in Place improvements to five low-moderate income homeowners.
- Habitat for Humanity provided closing cost assistance to three first-time low-moderate income homebuyers.

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

During PY19, the City continued to make entitlement funds available to the community through an open application process and issuance of subrecipient agreements. The City provided subrecipient training during the application phase, prior to the execution of Subrecipient Agreements, conducted 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 PY19 Annual Action Plan involved a variety of agencies and City departments. Collaboration and coordination between agencies is important to ensuring that the needs in the community are addressed. Stakeholder meetings were held during PY18 to assistance in the development of the PY19 Action Plan. Agencies provided information on housing and service needs and identified gaps in both categories. 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
- STEPS – self-sufficiency program
- San Antonio Food Bank – New Braunfels Facility – emergency food distribution and educational/nutrition programs
- Connections – emergency shelter for homeless and runaway youth
- The Salvation Army – Crisis and emergency services, meal program and supportive services for people experiencing homelessness and low income residents
- New Braunfels & Comal County ISDs – homeless liaisons and services for students who are experiencing homelessness or at-risk of homelessness.
- Hill Country MHDD – mental health services
- River City Advocacy – mental health services
- Village Circle Apartments – a rent assisted multifamily apartment complex providing housing to low-moderate households.

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 although it was slowed by COVID-19 restrictions during PY19. 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 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 PY19.

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.

Ongoing Compliance and Monitoring:

Projects proposed for PY19 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 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. 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.

Normally, all subrecipients receive at least one on-site monitoring visit during the Program Year. However due to COVID-19 restrictions desktop reviews were performed during PY19 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 19, 2020 through December 3, 2020. The public hearing was held at New Braunfels City Hall at a regularly scheduled City Council meeting on November 23, 2020 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 14, 2020.

Put in public comments after the comment period ends on December 3rd.

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 PY19. The City does not have an existing Section 108 loan.

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

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

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

Not Applicable.

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