

State of Texas Analysis of Impediments Action Steps

Impediment Action Steps Summary	Party Taking Action Step	Start by June 2011	Start by May 2012	Start by Nov 2012	Start by May 2013	Start by Nov 2013	Start After Nov 2013	Agency/ies taking Action	Date Action Started	Action Taken/Comments
1-1 Modify existing statute (Mortgage Broker License Act) to provide AFFH training for Mortgage brokers	Legislature	XX						TDHCA/GLO		Agencies have sent a letter to Legislative officials which included the recommended actions under Phase 1 that require legislative action to implement
1-2 First Time Homebuyer Program (FTHP) additional training for AFFH	TDHCA		XX					TDHCA	5/31/2012	TDHCA will add AFFH content to broker and originator training
1-3 Homebuyer education (HBE) classes additional training on fair housing complaint process	TDHCA		XX					TDHCA	5/31/2012	TDHCA is in contact with the country's largest HBE provider to ensure coverage of FH training and complaints
1-4 Monitor FTHP for distribution of loans/include in SLIHP	TDHCA				XX					
1-5 Modify existing statute to include similar mortgage training to TDHCA for all housing programs	Legislature	XX						TDHCA/GLO		Agencies have sent a letter to Legislative officials which included the recommended actions under Phase 1 that require legislative action to implement
1-6 TDHCA working with mortgage associations provide educational materials on AFFH	TDHCA		XX					TDHCA	on-going	TDHCA published educational items and submitted more to be published
1-7 TDHCA request meeting with lenders and mortgage brokers to discuss HMDA analysis	TDHCA			XX				TDHCA	11/3/2011; 4/1/2012	<ul style="list-style-type: none"> • Fair housing webpage for Realtors on TDHCA's website • Fair housing article published in Texas Realtor's April 2012 issue. • Texas Fair Housing Educational Materials (4 page handout)

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1-8 Additional education materials and websites to those participating in TDHCA Programs	TDHCA			XX				TDHCA	ongoing	TDHCA is developing materials which will take into account the final recommendations of the Phase 2 AI
1-9 Financial Literacy for home equity use in Round 2 and other homebuyer programs	TDHCA, DR Subs		XX					TDHCA/GLO	on-going	<ul style="list-style-type: none"> • TDHCA has a homebuyer education requirement tied to homebuyer programs • GLO is providing homeowner counseling to all eligible buyout owners which includes financial management tools • GLO will be providing training to procured Counseling Service providers and Subrecipients to ensure that there is clear and transparent communication to eligible applicants for the Homeowner Opportunity Program (HOP)
1-10 FTHB data collection on loans acceptance and rejections	TDHCA				XX					
1-11 State should consider imposing the self help housing restrictions on equity stripping.	Legislature	XX				XX		TDHCA/GLO		Agencies have sent a letter to Legislative officials which included the recommended actions under Phase 1 that require legislative action to implement
2-1 Modify existing statute to provide AFFH training for real estate professionals	Legislature	XX				XX		TDHCA/GLO		Agencies have sent a letter to Legislative officials which included the recommended actions under Phase 1 that require legislative action to implement

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2-2 TDHCA prepare additional real estate professionals in its programs	TDHCA			XX				TDHCA	11/3/2011	<ul style="list-style-type: none"> • Fair housing webpage for Realtors on TDHCA's website • Fair housing article drafted and slated for publication to Realtors in April 2012 • Texas Fair Housing Educational Materials (4 page handout)
2-3 TDHCA provide additional training on how to use its programs to AFFH	TDHCA			XX						TDHCA is developing materials which will take into account the final recommendations of the Phase 2 AI
2-4 Include Fair Housing recognition and reporting requirements in HBE courses	TDHCA			XX						A Fair Housing component is now included in the curriculum for Homebuyer Education.
2-5 Review home purchases by protected classes versus the entire pool of candidates in TDHCA programs and share information with real estate professionals	TDHCA				XX					
2-6 Modify existing statute to include similar TDHCA training and monitoring of applicants for all housing programs	Legislature	XX				XX		TDHCA/GLO		Agencies have sent a letter to Legislative officials which included the recommended actions under Phase 1 that require legislative action to implement
2-7 TDHCA expand current materials for real estate professionals to include AFFH and use them at existing real estate meetings	TDHCA			XX				TDHCA	ongoing	TDHCA is developing materials which will reflect the recommendations of the Phase 2 AI to educate real estate professionals about AFFH

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2-8 TDHCA to work with real estate groups on guidance for professionals to comply with Fair Housing Act	TDHCA			XX				TDHCA		TDHCA is developing materials which will reflect the recommendations of the Phase 2 AI to educate real estate professionals about AFFH
2-9 TDHCA to adopt a consumer oriented Fair Housing web page	TDHCA				XX			TDHCA	11/3/2011	Eight pages of fair housing topics on TDHCA website
2-10 TDHCA will work with attorney CLE providers to develop ethics credit on AFFH	TDHCA			XX				TDHCA	ongoing	TDHCA is in contact with the Texas Center for Legal Ethics in order to ascertain what assistive role the Department might play in attorney education
2-11 Add Fair Housing and AFFH information to First Thursday training	TDHCA		XX					TDHCA	11/3/2011	TDHCA added a fair housing component to 1st Thursday Income Eligibility training
2-12 TDHCA to work with apartment association representatives to provide leasing agents with training on AFFH or Fair Housing	TDHCA				XX			TDHCA		
2-13 When invited, TDHCA education trainings at apartment association events will include AFFH information	TDHCA			XX				TDHCA		TDHCA is developing materials which will take into account the final recommendations of the Phase 2 AI
2-14 TDHCA and TDRA will require chief elected officials that receive agency funding to have Fair Housing training and request the related trade organizations to include Fair Housing training so that it can be easily obtained	TDHCA, TDRA			XX		XX		TDA/GLO		Training of chief elected officials will be phased in beginning with 2013 applications.

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2-15 TDHCA and TDRA will require third party consultants using agency funds have training in AFFH	TDHCA, TDRA			XX				TDA/GLO	ongoing	TDA consultants currently receive Fair Housing training at Implementation Workshops. GLO consultants received AFFH training for Round 2 applications and additional training will be made available.
2-16 TDHCA establish minimum standards and best practices for affirmative marketing plans	TDHCA			XX				TDHCA	11/3/2011	HUD affirmative marketing procedures adopted in HOME, HTF, and HTC, and posted as a model on TDHCA website
2-17 Application log for owner or rental housing that tracks protected class status and are tracked by TDHCA. Also, TDHCA should require same of TSAHC programs funded by TDHCA, and request TSAHC do the same with their state funded	TDHCA, Subrecipient		XX					TDHCA	on-going	TDHCA is currently in the process of collecting and unifying data; TSAHC tracks protected classes for programs funded by TDHCA
2-18 TDHCA will require subrecipients to establish affirmative fair housing marketing plans and measure future awards against the success of the plan	TDHCA, Subrecipient	XX						TDHCA	ongoing	TDHCA requires subrecipients to establish affirmative fair housing marketing plans.
2-19 All TDHCA TDRA applicants must participate in AFFH training	TDHCA, TDRA, Subrecipient	XX						TDA	ongoing	<ul style="list-style-type: none"> GLO conducted training for all Round 2 DR participants. CDBG program provides AFFH training.

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2-20 TDHCA and TDRA will provide sufficient AFFH staff	TDHCA, TDRA					XX		TDHCA / TDA/ GLO	5/1/2011	<ul style="list-style-type: none"> • TDHCA hired a Fair Housing Coordinator in May 2011; responsibilities include coordinating and conducting Fair Housing and AFFH training. • TDA and GLO also have staff dedicated to Fair Housing
3-1 Produce PSAs on Fair Housing issues	TDHCA						XX	TDHCA	11/1/2011	TDHCA designed a fair housing outreach campaign (5 articles drafted and slated for publication in April 2012)
3-2 Distribution of Fair Housing literature in impacted areas	TDHCA, TDRA, Subrecipient		XX					TDHCA	11/3/2011	Texas Fair Housing Educational Materials (4 page handout) are being distributed at events TDHCA attends or presents, including 1st Thursday Income Eligibility Training and application workshops (added to MF application workshop in Austin, Dallas, and Housing in December 2011)
3-3 Continue to conduct Fair Housing activities	TDHCA, TDRA, Subrecipient	XX		XX		XX		TDHCA/TDA /GLO	ongoing	Each month, TDHCA and TDA continue to take additional actions to promote fair housing in our activities. GLO also coordinates with Subrecipients to monitor Fair Housing activities
3-4 Celebrate Fair Housing Month each year	TDHCA, TDRA, Subrecipient	XX		XX		XX		TDHCA/GLO	ongoing	TDHCA will continue to formally recognize and celebrate April as Fair Housing Month

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3-5 TDHCA TDRA Website/page for statewide fair housing issues	TDHCA, TDRA					XX		TDHCA	11/3/2011	<ul style="list-style-type: none"> • Eight pages dedicated to fair housing topics on TDHCA website • TDHCA internally formalized a fair housing complaint referral process and is working with the Texas Workforce Commission on a process for referring complaints through a formal Memorandum Of Understanding (MOU)
4-1 NIMBYism education and outreach	TDHCA, TDRA, Subrecipient			XX			XX	TDHCA	12/1/2011	<ul style="list-style-type: none"> • Texas Fair Housing Educational Materials (4 page handout) • Brochure specific to multifamily developments drafted and anticipated to be relased early 2012 • TDHCA designed a fair housing outreach campaign (5 articles drafted and slated for publication in April 2012)
4-2 Develop guidance on how to combat NIMBYism	TDHCA, TDRA, Subrecipient			XX						The Phase 2 AI contains additional strategies for combating NIMBYism, which shall be integrated and developed upon completion of Phase 2
4-3 TDHCA to factor components to RAF	TDHCA		XX		XX		XX	TDHCA	3/26-4/23/2012	As part of the RAF review process early in 2012, TDHCA determined that these factors would have more impact if used at the application scoring level

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4-4 TDHCA to work with Texas A&M on Fair Housing issues	TDHCA, Texas A&M			XX				TDHCA		TDHCA has contacted the Texas A&M Real Estate Center offering assistance in research projects related to fair housing
4-5 Develop a GIS going forward for projects funded with federal/state funds from TDRA and TDHCA	TDHCA, TDRA		XX					GLO/TDA	ongoing	<ul style="list-style-type: none"> GLO currently tracks all of disaster recovery nonhousing projects in GIS TDA is currently reviewing new software
5-1 Review of Long Term infrastructure plans for AFFH success	TDRA, Subrecipient			XX				TDA	on-going	Any sctions taken with regard to this Action Step will be taken at the local level.
5-2 Reduce “siloiing” of Fair Housing issues by expanding process into all departments	Subrecipient				XX					
5-3 Require senior staff—including mangers and attorneys—of TDRA and TDHCA subrecipients to obtain training in AFFH.	TDHCA, TDRA, Subrecipient		XX					GLO/TDA	on-going	<ul style="list-style-type: none"> GLO Program managers received AFFH training TDA will explore options to work with other state agencies to develop a mapping system for their CDBG awards
5-4 Newly appointed/elected Board member, Commissioner and/or councilmember training in AFFH	TDHCA, TDRA, Subrecipient					XX				
5-5 Possible adoption of infrastructure concentration limits by local communities	Subrecipient				XX					
5-6 If tax abatements or other infrastructure supports are provided to non-federal housing, seek affirmative marketing programs to support Fair Housing initiatives	Subrecipient					XX				

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5-7 Non-entitlement communities should look HUD or TDHCA for housing resources to further benefit infrastructure improvement projects	Subrecipient			XX				TDHCA/TDA /GLO	on-going	TDA - TxCDBG currently provides funds for infrastructure projects
5-8 Infrastructure projects should address access issues—especially in areas like courthouses, community centers and other high traffic areas	Subrecipient		XX					GLO/TDA		<ul style="list-style-type: none"> GLO-assisted projects must comply with UFAS, Section 504 of the Rehabilitation Act of 1973 and ADA as applicable TDA ensures applicable projects meet federal and state requirements concerning the elimination of architectural barriers encountered by persons with disabilities.
5-9 Communities should submit a FFAST Form when applying for state or federal grants to TDRA or TDHCA including detailed community wide benefit descriptions	Subrecipient	XX						GLO	12/9/2011	GLO required this for all Round 2 DR applications

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5-10 Consider ways to protect flood impacted low income, protected class, and colonia communities from future flooding	Subrecipient	XX						GLO/TDA	3/1/2011	<ul style="list-style-type: none"> GLO has drainage projects targeted at these areas (dollars are included in separate report) In addition to the nonhousing disaster recovery program , TDA has made 88 awards totaling \$27,606,664 to improve infrastructure within the communities impacted by the hurricanes, including colonias since March 2011.
5-11 Where applicable look at program participation restrictions for persons located in floodplains or floodways. Does not include TDRA programs that restrict purchase after floodplain designation	Subrecipient, TDHCA, TDRA		XX					TDA/GLO		GLO and TDA do not have restrictions about building in floodplains that exceed federal requirements
5-12 Communities located predominately within floodplains should establish clear standards that allow for proper elevation and visitability	Subrecipient	XX						GLO/TDA	8/15/2011	<ul style="list-style-type: none"> GLO encourages this as part of our fair housing process TDA through their state CDBG Planning and Capacity Building contracts require a review of zoning and land uses that impact fair housing choice.

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5-13 Provide a moving to opportunity programs for concentrated disaster survivors	Subrecipient, TDHCA, TDRA		XX					GLO		GLO is developing a HOP program for Subrecipients to follow to ensure that qualified applicants are provided with an opportunity to relocate. TDHCA sent a letter to HUD regarding vouchers for MOP.
5-14 Create a needs assessment to provide guidance impacted groups based on need caused by the storm	Subrecipient	XX						GLO	9/1/2011	GLO required housing subrecipients to complete needs assessments to access Round 2 disaster recovery funds
5-15 All infrastructure programs funded with disaster recovery funds will be designed in a manner such that any publicly accessible infrastructure projects and associated facilities assisted by the infrastructure program are fully accessible to persons with disabilities	Subrecipient, TDRA	XX						GLO/TDA	ongoing	GLO and TDA adhere to all federal, state, and local codes, including accessibility requirements, related to their respective infrastructure programs
5-16 Repair damaged public housing (family and elderly) within 24 months	Subrecipient, TDHCA, TDRA	XX						GLO		GLO has set-aside funding under the disaster recovery program totaling more than \$100 million for these activities
6-1 Establish testing for Fair Housing issues and include education on self testing	TDHCA, Subrecipient, Grantee				XX			TDHCA	11/1/2011	TDHCA will continue monitoring the results of testing undertaken by local housing agencies and FHIPs.

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6-2 TDHCA should conduct a pilot program to provide Fair Housing testing funds to third parties	TDHCA				XX			TDHCA	11/1/2011	TDHCA lacks the funding at the present time to enact such a program, but will be expanding its role in keeping abreast of testing activities at the local level
6-3 Entities certifying that they are affirmatively furthering fair housing should provide a document providing enforcement information	TDHCA, TDRA, Subrecipient, Grantee				XX			TDHCA	9/23/2011	TDHCA and the Texas Workforce Commission are working toward a Memorandum of Understanding related to fair housing referrals
6-4 Place contacts on websites for local, state, and federal levels for where to report Fair Housing complaints	Subrecipient, Grantee		XX					TDHCA	on-going	<ul style="list-style-type: none"> • TDHCA updated their website and will encourage administrators to do the same • GLO requires that Subrecipients follow the GLO Housing Guidelines that require Subrecipients to use the Fair Housing logo in Program advertising, post Fair Housing posters and related information, and, in general, inform the public of its rights under Fair Housing regulations law. The GLO has a Fair Housing section on the website with links to the HUD complaint process.
6-5 TDRA and TDHCA will sign an MOU to forward Fair Housing Complaints to TWC	TDRA, TDHCA	XX						TDHCA	11/21/2012	TDHCA and the Texas Workforce Commission have executed a Memorandum of Understanding related to fair housing referrals

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6-6 TDHCA and TDRA will request their respective boards to hold board education session on Fair Housing at least every two years	TDRA, TDHCA			XX			XX	TDA/TDHCA		TDA is governed by a Commissioner, rather than by a board. TDHCA and TDRA will request their respective boards to hold board education session on Fair Housing at least every two years
6-7 State and HUD will review the fair housing investigation system and look for improvement	TWC, TDRA, TDHCA, HUD					XX				
6-8 Develop and publish clear statement of process for Fair Housing. Keep logs of inquiries, allegations, complaints and referrals. Provide the reports to respective agency.	Subrecipient, Grantee, TDHCA, TDRA					XX		TDHCA	11/3/2011	<ul style="list-style-type: none"> • TDHCA internally formalized the fair housing complaint referral process and is training staff on its use • TDHCA and the Texas Workforce Commission are working toward a Memorandum of Understanding related to fair housing referrals
7-1 Community review of local building and zoning ordinances and their direct impact on Fair Housing	Subrecipient, Grantee, TDRA		XX					GLO/TDA	8/15/2011	<ul style="list-style-type: none"> • GLO required disaster recovery communities to address fair housing impediments identified in the Phase 1 AI through the FFAST form process • Beginning with the CDBG Planning and Capacity Building contracts awarded in August 2011, cities are required to address fair housing choice during zoning ordinance review and new zoning ordinance

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7-2 Community review of local building and zoning ordinances and their disparate impact on Fair Housing	Subrecipient, Grantee		XX					GLO/TDA	8/15/2011	<ul style="list-style-type: none"> • GLO required disaster recovery communities to address fair housing impediments identified in the Phase 1 AI through the FFAST form process • Beginning with the CDBG Planning and Capacity Building contracts awarded in August 2011, cities are required to address fair housing choice during zoning ordinance review and new zoning ordinance development • Applicants identified this impediment in their FFAST Form to the GLO for approval. All participating applicants have conducted or will conduct a Fair Housing Review or will develop a policy that addresses fair housing choice during building and zoning ordinance review and new
7-3 Communities with long term plans should look for ways to include mixed income and provide incentives for this type of housing to break up concentrations	Subrecipient, Grantee		XX					GLO	on-going	The Round 2 Housing guidelines require Subrecipients to use needs assessment data when developing the appropriate income mix for housing developments in order to reflect the needs of local

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7-4 Communities seeking disaster recovery funds for housing should consider expedited permitting and review processes.	Subrecipient, Grantee, TDHCA		XX					GLO	on-going	GLO will work with Subrecipients and contracted grant administrator firms in providing TA to ensure they seek out expedited permitting and review processes in their communities.
8-1 Texas should review what steps it can take to shorten emergency re-housing periods even though it is a federal program.	TDHCA, Legislature	XX				XX		TDHCA/GLO		Agencies have sent a letter to Legislative officials which included the recommended actions under Phase 1 that require legislative action to implement
8-2 Local governments should review zoning or land use restrictions that limit the ability to accept FEMA provided temporary housing	Subrecipient, Grantee			XX				GLO/TDA/T DHCA		N/A to TDA
8-3 A plan should be in place prior to storms to allow early responders to provide housing into communities where disasters could happen	Subrecipient, Grantee			XX				GLO/TDA/T DHCA		Temporary Emergency Housing contractors have been contracted with by the State to be activated in the event of a declared disaster.
8-4 TDHCA develop disaster recovery best practices by January 2012	TDHCA		XX					GLO	on-going	The GLO is working with Subrecipients to implement programs in accordance with best practices developed by the Natural Disaster Housing Reconstruction Committee's Natural Disaster Housing Reconstruction Plan and with lessons learned in the GLO housing program and with other stakeholders.

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8-5 Coalition to look for ways to improve the HUD interpretation of DOB	TDHCA, Subrecipient, Grantee	XX						GLO	ongoing	GLO issued updated guidance to improve flexibility (12/2011)
8-6 TDHCA to monitor HOP Program and issue reports on progress starting in 2012	TDHCA		XX				XX	GLO	6/1/2012	GLO will monitor as part of Round 2 DR program and will be providing training to Recipients to ensure that there is clear and transparent communication regarding the Homeowner Opportunity Program (HOP), to include reporting requirements.
8-7 Planning for title clearance should be included in any disaster planning. Agreements with law schools should be pursued to deliver this program	TDHCA, Subrecipient, Grantee				XX					
9-1 Review zoning codes for indirect or direct limitations for special needs persons	Subrecipient, Grantee		XX					TDHCA	1/1/2012	TDHCA is in the process of analyzing zoning and land use restrictions as part of the Phase 2, statewide AI
9-2 Review codes to determine if there are requirements that would increase costs to special needs persons to live in a community	Subrecipient, Grantee		XX					TDHCA	1/1/2012	TDHCA is in the process of analyzing zoning and land use restrictions as part of the Phase 2, statewide AI
9-3 Consider working with Health and Housing Services Coordination Council for best practices with supportive services	Subrecipient, Grantee				XX					
9-4 COGs will appoint a community board to provide input on special needs programs	Subrecipient, Grantee, COGs	XX								Any actions taken with regard to this Action Step will be taken at the local level.

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10-1 Place LURAs to accept Section 8 vouchers for 10 years if builder uses DR funds and has more than 20 single family units or any multifamily units	Subrecipient, Grantee		XX					GLO	Ongoing	The LURA requirement for multi-family rental is a part of the Round 2 Housing guidelines Subrecipients must follow.
10-2 State and COGS will join Advocates requesting an additional 2,500 housing vouchers in the impacted area	TDRA, TDHCA, Subrecipient, Grantee	XX						TDHCA/GLO /TDA	3/25/2012	Letter sent signed by T. Irvine & J. Henneberger to S. Henriquez at HUD requesting 2500 vouchers (\$1m/yr for 5 yrs)
10-3 Conduct research on the need for subsidies for rents of very low and extremely low income residents and bring it to HUD and Congress	TDHCA, Subrecipient, Grantee				XX					
10-4 Subrecipients and TDHCA will work with local PHA's on tenant counseling and fair housing education	TDHCA, Subrecipient, Grantee				XX					
10-5 Use, as a research tool on the patterns of Section 8 housing, Appendix M of this AI	Subrecipient, Grantee, TDHCA		XX					TDHCA	6/1/2012	TDHCA posted the Section 8 maps to the website as a research tool for subgrantees
10-6 TDHCA will send a letter to local PHA's informing them of FMR pilot demonstration programs that could be used in their areas to expand fair housing choices.	TDHCA	XX								The Dallas, Texas HUD Metropolitan Fair Market Rent Area covered part of the Dallas metropololitan area, and several Dallas-area PHAs participated.
11-1 TDRA and TDHCA will look for efficiencies in building new houses while still working to meet AFFH including accessibility	TDRA, TDHCA	XX						TDHCA	pre-2011	TDHCA's Amy Young Barrier Removal Program can be used to fund accessibility features

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11-2 Subrecipients should consider density bonuses for developments that look to provide more affordability	Subrecipient, Grantee			XX						Any actions taken with regard to this Action Step will be taken at the local level.
11-3 Subrecipients will include in LURAs a first right of refusal and a period to not allow conversion to market rate units	Subrecipient, Grantee, TDHCA		XX					TDHCA	on-going	TDHCA included language in LURAs to preserve affordability, including first right of refusal clauses
11-4 State should include incentives for adopting AFFH programs	TDRA, TDHCA	XX						GLO/TDA	8/15/2011	<ul style="list-style-type: none"> GLO required fair housing action plans as part of the Round 2 DR funding Under the state CDBG program, planning grant awardees are required to address fair housing choice through an analysis of housing problems and needs, identification of previous implementation actions, determination of local administrative and legal capacity to overcome housing-related problems and provide remedies for housing needs, and identification of future implementation actions. (8/15/2011)
11-5 The state and subrecipients should consider using CDBG funds to buy down high cost and high opportunity developments sites	TDRA, TDHCA, Subrecipient, Grantee						XX			
12-1 Conduct the HOP program to AFFH.	Subrecipient, Grantee, State	XX						GLO		This is part of the GLO disaster recovery program

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12-2 TDHCA will request continued commitment from the Legislature to assist the voucher relocation program with HTF	TDHCA	XX						TDHCA		Agencies have sent a letter to Legislative officials which included the recommended actions under Phase 1 that require legislative action to implement
12-3 Jurisdictions receiving HUD funds need to establish Section 3 programs related to local jobs	Subrecipient, Grantee, TDHCA		XX					TDHCA/TDA /GLO	ongoing (Regular CDBG-6/30/2010)	<ul style="list-style-type: none"> All three state agencies are implementing Section 3 programs, and training recipients on Section 3 requirements Regular CDBG program implemented enhanced Section 3 requirements on June 30, 2010 GLO adopted a Section 3 Policy for Recipients to follow that identifies several Section 3 requirements to include monthly, quarterly and annual reporting with staff designated as the Section 3 Coordinator to monitor, train and provide guidance on the requirements of Section 3
12-4 TDHCA and TDRA will each provide sufficient staff resources regarding Section 3 assistance.	TDRA, TDHCA		XX					TDHCA/TDA /GLO	pre-2011 (Regular CDBG-6/30/2010)	All three state agencies have staff with assigned Section 3 responsibilities, conduct training on Section 3 requirements, report on Section 3 progress, and received training from HUD

State of Texas Analysis of Imepdiments Action Steps

Impediment Action Steps Summary	Party Taking Action Step	Start by June 2011	Start by May 2012	Start by Nov 2012	Start by May 2013	Start by Nov 2013	Start After Nov 2013	Agency/ies taking Action	Date Action Started	Action Taken/Comments
12-5 Prior to application submission, TDRA and TDHCA will require AFFH training for all those involved in applying for HUD funds	TDRA, TDHCA			XX				GLO/TDA	5/1/2012 - ongoing	<ul style="list-style-type: none"> Disaster recovery recipients were required to attend fair housing training prior to applying for additional disaster recovery funds under Round 2. TDA includes fair housing training in implementation workshops.
13-1 Subrecipients should consider incentives to get increased set asides of affordable housing for person with special needs	Subrecipient, Grantee	XX								Any actions taken with regard to this Action Step will be taken at the local level.
13-2 TDHCA should consider additional language to provide service enriched housing in the HTF programs for subrecipients.	TDHCA			XX				TDHCA		The Housing Trust Fund provides loans and grants to finance, acquire, rehabilitate, and develop decent and safe single family housing. The Housing Trust Fund focuses on owner or renter-occupied housing modifications.
13-3 TDHCA will review modifications of MF bond rules to support development of service enriched housing.	TDHCA		XX					TDHCA	10/4/2012	TDHCA's 2012 QAP includes point incentives for affordable housing developments that will be located in traditionally underserved areas that allow access to a variety of services and socioeconomic opportunities.
13-4 TDHCA will explore obtaining national Disability Opportunity Funds to help with additional special needs funding.	TDHCA					XX				

State of Texas Analysis of Imepdiments Action Steps

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13-5 TDRA and TDHCA will explore how CDBG funds can be used to address service enriched housing.	TDRA, TDHCA					XX				
13-6 Funding entities should use point incentives for developments proximity to medical facilities	TDHCA, Subrecipient, Grantee				XX			TDHCA	pre-2011	Housing Tax Credit developments are incentivized to locate properties close to services and amenities considered beneficial to the tenants, including medical offices, hospitals or clinics.
13-7 When using federal funds, all constructed homes should have accessibility features (2306.514)	TDHCA, TDRA, Subrecipient, Grantee	XX						TDHCA/TDA / GLO	pre-2011	TDHCA and GLO require compliance with 2306.514 and enforces compliance through monitoring reviews. TDA-requires compliance with HUD requirements.
14-1 COGs will conduct an analysis to determine infrastructure needs of colonias.	Subrecipient, Grantee, TDRA				XX			GLO/TDA	3/1/2011	<ul style="list-style-type: none"> GLO has more than \$50 million in DR infrastructure projects in the colonias. TDA has spent Since March 2011, the state CDBG program has provided funding to meet the needs in colonias areas through 23 awards totaling \$9,145,355.
15-1 TDHCA will include insurance related issues in their Homebuyer counseling programs.	TDHCA, Subrecipient, Grantee		XX					GLO	on-going	GLO is providing homeowner counseling to all eligible buyout owners which includes financial management tools

State of Texas Analysis of Impediments Action Steps

Impediment Action Steps Summary	Party Taking Action Step	Start by June 2011	Start by May 2012	Start by Nov 2012	Start by May 2013	Start by Nov 2013	Start After Nov 2013	Agency/ies taking Action	Date Action Started	Action Taken/Comments
16-1 Continue Fair Housing Training for DR subrecipients.	TDRA, TDHCA	XX						GLO	ongoing	The GLO developed a FFAST form to facilitate compliance with the AI in the disaster affected communities and required subrecipients to complete the form prior to receiving additional disaster recovery funds
16-2 TDRA and TDHCA should work together to develop a plan for continued Fair Housing training	TDRA, TDHCA					XX				
16-3 TDRA and TDHCA continue to be a Fair Housing resource for subrecipients, including TDRA continuing to employ a fair housing consultant	TDRA, TDHCA	XX						TDHCA	11/3/2011	TDHCA added eight pages of fair housing topics on their website
16-4 Subrecipients, TDRA and TDRA will keep adequate records to document compliance with CA and federal laws.	TDHCA, Subrecipient, Grantee	XX						TDHCA/GLO /TDA	5/1/2011	All three state agencies keep records demonstrating compliance with the federal and state laws governing the respective programs, and keep records of actions taken toward compliance with the Conciliation Agreement, including this document
16-5 Conduct new AI's or update as necessary. State will conduct a balance of state AI.	TDHCA, Subrecipient, Grantee		XX					TDHCA	11/11/2011	TDHCA procured a qualified contractor to complete the update of the state's Analysis of Impediments which is anticipated to be complete by 12/2012

State of Texas Analysis of Imepdiments Action Steps

Impediment Action Steps Summary	Party Taking Action Step	Start by June 2011	Start by May 2012	Start by Nov 2012	Start by May 2013	Start by Nov 2013	Start After Nov 2013	Agency/ies taking Action	Date Action Started	Action Taken/Comments
16-6 TDHCA and TDRA will include as part of its regular training information on record keeping in conformance with CA and AI	TDRA, TDHCA		XX					TDHCA/GLO /TDA	5/1/2011	<ul style="list-style-type: none"> GLO trained recipients on the contents of the Conciliation Agreement and AI; TDHCA and TDA will do the same following the completed update of the AI for the state of Texas GLO is currently enhancing its reports and systems to continue to ensure that data is captured as required by the CA and AI.
16-7 Develop and adopt a FFAST form that will facilitate compliance with this AI for local communities	TDRA, TDHCA	XX						GLO	5/1/2011	The GLO developed a FFAST form to facilitate compliance with the AI in the disaster affected communties and required subrecipients to complete the form prior to receiving additional disaster recovery funds