

**Travis County Fair Housing Action Plan
2018 Report of Accomplishments**

Goals	Strategies to Meet Goals	Responsible Entities	Benchmark	Year to be Completed	Progress in 2014
Impediment #1: Isolation of low-income rural communities					
Improve living conditions for lower-income populations, among which members of the protected classes are heavily represented	Continue to invest CDBG funds to provide basic living environment improvements in impacted areas	CDBG Office, Commissioners Court	Reporting of Completed Projects in the CAPER	Ongoing	CDBG continues to fund owner occupied home rehabilitation and a street improvement project in the Lake Oak Estates neighborhood.
	Continue to support social workers in efforts to connect far-flung low-income residents with available programs and services	CDBG Office, Commissioners Court	Reporting of Completed Projects in the CAPER	Ongoing	Continued CDBG funding in 2014 resulted in services to 191 people.
	Look for opportunities to expand services to far-flung low income residents through new investment or by influencing others to invest in a more geographically targeted way.	CDBG Office, Commissioners Court	Reporting of New Opportunities in the CAPER	Ongoing	The County has provided \$1,000,000 of General Funds to the Department to expand social services. During 2014, the Commissioners Court approved the Department's plan to geographically target these funds to impacted areas with very low to low opportunity outside the City of Austin. The RFS will be released in PY 2014.

Appendix B: Analysis of Impediments to Fair Housing Choice
2014-2018

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Progress in 2015	Progress in 2016	Progress in 2017	Progress in 2018
Impediment #1: Isolation of low-income rural communities			
CDBG completed 17 homes during 2015 and continues to fund the project for next year. Lake Oak Estates street improvements were completed.	CDBG completed repairs on 10 homes during 2016 and continues to fund the project for next year.	CDBG completed repairs on 18 homes during 2017 and continues to fund the project for next year.	CDBG completed repairs on 21 homes during 2018. This project will be recompeted in PY2018.
170 people assisted in 2015 with continued funding approved in 2016.	136 people assisted in 2016 with continued funding approved in 2017. This project will be phased out in PY2018 as other non-profits are showing interest in focusing services outside the urban core. The services will continue without CDBG funds.	145 people assisted in 2017. This project was phased out in PY2018 as other non-profits are showing interest in focusing services outside the urban core. The services will continue without CDBG funds.	This project was phased out in PY2018 as other non-profits are showing interest in focusing services outside the urban core. The services have continued without CDBG funds.
The RFS referenced in 2014 was released. A contract has been negotiated and it anticipated to be approved November 2015. Services will be provided in 2016.	The PY 2016 investment in Holistic Family Services represents the first full year of implementation. This pilot program uses a Wraparound Family Intervention approach to address multiple complex needs of whole families, in an effort to create lasting, positive change for children in these families. Services focus on families with children in the outlying areas of Travis County, and more specifically, impacted block groups in areas of very low or low opportunity outside of the City of Austin. Services currently target families residing in the 78653 zip code. Service provision began in June 2016. Thirty-two families, totaling 153 people were enrolled in the program during PY2016. Eleven people served were homeless, temporarily sheltered.	The PY 2017 investment in Holistic Family Services represents the second full year of implementation. This pilot program uses a Wraparound Family Intervention approach to address multiple complex needs of whole families, in an effort to create lasting, positive change for children in these families. Services focus on families with children in the outlying areas of Travis County, and more specifically, impacted block groups in areas of very low or low opportunity outside of the City of Austin. Services currently target families residing in the 78653 zip code. Service provision began in June 2016. Thirty-two families, totaling 134 people were enrolled in the program during PY2017. Eleven people served were homeless, temporarily sheltered.	The PY18 investment in Holistic Family Services uses a Wraparound Family Intervention approach to address multiple complex needs of whole families, in an effort to create lasting, positive change for children in these families. Services focus on families with children in the outlying areas of Travis County, and more specifically, impacted block groups in areas of very low or low opportunity outside of the City of Austin. Services currently target families residing in the 78653 zip code. Service provision began in June 2016. Fifty-one families, totaling 203 people, were enrolled in the program during PY18. Sixteen people served in PY18 were homeless or temporarily sheltered. Eighteen of the 22 (82%) families who exited the program in PY18 were reported to have safe and sufficient housing at program exit – exceeding the program performance target of 65%.

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Impediment #2: Poor condition of housing stock in unincorporated areas					
Balance the revitalization of racially/ethnically concentrated LMI areas with the expansion of affordable housing opportunities elsewhere	Continue investment in the rehabilitation of owner-occupied housing in the Urban County	CDBG Office, Commissioners Court	Number of homes rehabilitated	Ongoing	35 homes were repaired during 2014. Additional homes were repaired or improved through the Department's Housing Services Division with other Federal, State and local funds.
	Look for opportunities to invest in the creation of new affordable housing in non-impacted areas of moderate to very high opportunity	CDBG Office	Reporting of New Opportunities Reviewed in the CAPER	Ongoing	A multi-family housing project was proposed and supported with CDBG funding in the PY14 Action Plan. The project was located in a non-impacted, moderate area of opportunity. The project was withdrawn by the developer.
	Study the feasibility of pursuing Section 108 funds through the CDBG program, which would allow access to up to five times the annual entitlement grant to infuse the housing rehabilitation program with capital.	CDBG Office	Completed Analysis	2016	No action taken.

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Impediment #2: Poor condition of housing stock in unincorporated areas			
17 homes were repaired during 2015. Additional homes were repaired or improved through the Department's Housing Services Division with other Federal, State and local funds.	Ten homes were repaired during 2016. Additional homes were repaired or improved through the Department's Housing Services Division with other Federal, State and local funds.	Eighteen homes were repaired during 2017. Additional homes were repaired or improved through the Department's Housing Services Division with other Federal, State and local funds.	Twenty-one homes were repaired during 2018. Additional homes were repaired or improved through the Department's Housing Services Division with other Federal, State and local funds.
We have reviewed several project locations for the Travis County Housing Finance Corporation and made recommendations. No requests for new affordable housing were presented for CDBG funding consideration in 2015.	The PY16 Action Plan includes an approved project that allocates funds for the purpose of developing affordable housing in the CDBG service area. During PY16, a project site and developer were identified, and the project was amended to reflect both the reallocation of funds from cancelled PY15 & PY16 projects and the project details. The property will offer 312 one-, two-, three- and four-bedroom units at 50% and 60% of AMI.	The PY17 Action Plan includes an approved project that allocates funds for the purpose of developing affordable housing in the CDBG service area. During PY17, the land was purchased and construction has begun. The property will offer 312 one-, two-, three- and four-bedroom units at 50% and 60% of AMI. Lease up is anticipated to start at the end of 2019.	The PY18 Action Plan includes an approved project that allocates funds for the purpose of developing affordable housing in the CDBG service area. During PY17, the land was purchased and construction was underway throughout 2018. The property will offer 312 one-, two-, three- and four-bedroom units at 50% and 60% of AMI. Lease up is anticipated to start at the end of 2019 or early 2020.
No action taken.	CDBG staff's current work load with the affordable housing policy committee has taken a significant portion of time. At this time, CDBG does not have the bandwidth to complete a feasibility study. We will re-assess after the policy work is substantially complete at the end of PY2017.	CDBG staff's current work load with the affordable housing policy committee has taken a significant portion of time. At this time, CDBG does not have the bandwidth to complete a feasibility study, and our current home repair program appears to be handling the requests fairly easily. It may be more prudent to consider at 108 loan for mobile home swap or reconstruction.	CDBG staff's current work load with the affordable housing policy committee has taken a significant portion of time. At this time, CDBG does not have the bandwidth to complete a feasibility study, and our current home repair program appears to be handling the requests fairly easily. It may be more prudent to consider at 108 loan for mobile home swap or reconstruction.

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Impediment #3: Increasingly prohibitive housing costs					
Balance the revitalization of racially/ethnically concentrated LMI areas with the expansion of affordable housing opportunities	Support the Housing Finance Corporation in growing its tenant-based rental assistance program and seeking greater engagement among landlords, particularly with units outside of impacted areas	CDBG Office, Commissioners Court	Reporting of Completed Projects in the CAPER	Ongoing	23 households received TBRA during 2014 with \$171,561.58 of HOME funds from the State.
	Encourage the HFC to continue its efforts to provide down payment assistance to income eligible households and work with developers to create affordable units through the single-family and multi-family bond programs	CDBG Office, Commissioners Court	Reporting of Completed Projects in the CAPER	Ongoing	In September 2014, TCHFC issued \$22,000,000 in tax exempt bonds to finance the construction of a 252 unit LIHTC property, William Cannon Apartments. This project is focused to households earning 50-60% MFI. Another property is currently undergoing renovations, assisted by the TCHFC through tax exempt bonds. Issuance of a \$122,400 loan to a developer applying for a 9% LIHTC for a property in northern Travis County to address workforce housing.
	Encourage the HFC to incorporate priority areas for new construction investment into its funding guidelines to expand affordable housing in opportunity areas	CDBG Office	Reporting of New Opportunities in the CAPER	Ongoing	During 2014, the CDBG program consulted on several project options and reviewed each for fair housing compliance.

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Impediment #3: Increasingly prohibitive housing costs			
6 households received TBRA during 2015 with \$33,957.00 of HOME funds from the State. The contract ended in September 2015.	No action taken, this grant and program are now closed.	No action taken, this grant and program are now closed.	No action taken, this grant and program are now closed.
TCHFC's new homebuyer assistance program the Hill Country Home Down Payment Assistance program (HCHDPA), began in November 2014. As of September 30, 2015, the program had provided \$891,680.40 in down payment assistance, with 98 mortgage loans closed totaling \$18.95 million. In March 2015, TCHFC issued \$26,800,000 in tax exempt bonds to finance the construction of a 252 unit LIHTC property, The Heights on Parmer. Other projects moved forward and can be found in more detail in the Appendix of the PY14 CAPER.	As of September 30, 2017, HCHDPA had provided \$3,757,747.46 in down payment assistance, with approximately 357 mortgage loans closed totaling \$73.81 million since program inception. The Heights at Parmer property stabilized in Program Year 2016 with an average occupancy of 95% or higher. In August 2017, the Board approved the initial inducement to issue bonds for McKinney Falls Apartments: TCHFC is the bond issuer and GP on this property. The TCC Hill Country Development Corporation will be the GC on this property. This property will offer 312 one-, two-, three- and four-bedroom units at 50% and 60% of AMI. This is the same project where CDBG funds are being made available for land acquisition.	As of September 30, 2018, HCHDPA had provided \$4,204,111.74 in down payment assistance, with approximately 385 mortgage loans closed totaling \$80.53 million since program inception. TCHFC is the bond issuer and GP on the McKinney Falls Apartments. The final inducement and issuance of bonds occurred in Program Year 2017. This property also received \$750,000 in CDBG funds as a forgivable loan for land acquisition. This project broke ground in mid-2018 and is currently under construction. This property will offer 312 one-, two-, three- and four-bedroom units at 50% and 60% of AMI. <ul style="list-style-type: none"> • During PY17, the TCHFC Board approved the initial inducement to issue bonds for the following properties: Limestone Ridge Senior Apartments (225 units); Grand Station Apartments (216 units); Cascades at Onion Creek Apartments (264 units); Legacy Ranch at Dessau East Partments (232 units.) 	As of September 30, 2019, HCHDPA had provided more than \$4.35 million in down payment assistance, with slightly more than 400 mortgage loans closed totaling more than \$80 million since program inception. TCHFC is the bond issuer and GP on the McKinney Falls Apartments. The final inducement and issuance of bonds occurred in Program Year 2017. This property also received \$750,000 in CDBG funds as a forgivable loan for land acquisition. This project broke ground in mid-2018 and is currently under construction. This property will offer 312 one-, two-, three- and four-bedroom units at 50% and 60% of AMI. During PY18, the TCHFC Board approved the initial inducement to issue bonds for the following properties: Limestone Ridge Senior Apartments (225 units); Grand Station Apartments (216 units); Cascades at Onion Creek Apartments (264 units); Legacy Ranch at Dessau East Partments (232 units.)
During 2015, the CDBG program consulted on several project options and reviewed each for fair housing compliance.	During 2016, CDBG staff reviewed 14 proposed sites for Low Income Housing Tax Credit (LIHTC) deals for fair housing compliance and drafted a Fair Housing Policy that will apply to LIHTC projects.	During 2017, CDBG staff reviewed 5 proposed sites for Low Income Housing Tax Credit (LIHTC) deals for fair housing compliance and drafted a Fair Housing Policy that will apply to LIHTC projects.	During PY18, Fair Housing Screens for Resolutions of No Objection (RONO) were completed for six projects. CDBG staff recommended five of these, totaling 1,078 units. The Commissioners Court approved six of the RONO's in the support of the development of 1,340 new multi-family units.

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Impediment #3: Increasingly prohibitive housing costs (continued)					
<i>(continued from previous)</i>	Develop an Affordable Housing Policy for Travis County that includes siting recommendations	CDBG Office, HFC and Commissioners Court	Implementation of new policy	2015/2016	No action taken.
	Develop incentive-based permitting processes for mixed-income subdivisions	TNR	Implementation of new incentives	2016	No action taken.
Preserve affordable housing stock	Encourage the Strategic Housing Finance Corporation to proceed with plans to acquire and maintain the affordability of tax-credit developments for which affordability requirements are set to expire.	CDBG Office, Commissioners Court	Number of units preserved	Ongoing	No action taken.

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Progress in 2015	Progress in 2016	Progress in 2017	Progress in 2018
Impediment #3: Increasingly prohibitive housing costs (continued)			
<p>During 2015, the creation of an Affordable Housing Policy committee occurred. Values have been drafted and are moving through the approval process. In addition, the committee has identified a series of categories to create policy to influence County resources and future development as allowable by law.</p>	<p>During PY16, the committee developed a housing pre-application, application and fair housing review policy and forms. These documents are pending legal review and then will move through an approval process. The committee began review and evaluation of over forty Implementation Tools for Affordable Housing Development that will be presented to the Commissioners Court for consideration. A subcommittee worked on the County's Public Improvement District (PID) policy. Work of the subcommittee included the drafting of the Affordable and Fair Housing Policy section of the PID policy and preliminary framework to conduct reviews of proposed PID petitions to ensure compliance with fair housing requirements and to provide recommendations related to affordable housing and improving opportunity. To date, one review has been completed and one was underway at the close of the PY16 program year.</p>	<p>During PY17, the Affordable Housing Policy committee met on a monthly basis. As part of its charge, the Committee reviewed over 30 tools that help create affordable housing or support affordable and fair housing. The Committee assessed each tool based on the County's authority to use the tool, the potential risks and benefits of the tool, and resources need for implementation. Based on this analysis, the Committee developed a set of recommendations around which implementation tools the County should prioritize. A detailed overview of the implementation tools and committee recommendations were presented during a Commissioners Court work session on February 8, 2018. The committee recommendations were approved by the Commissioners Court on February 20, 2018. A subcommittee of the Affordable Housing Policy Committee that includes CDBG staff worked on the County's Public Improvement District (PID) policy. Work of the subcommittee included the drafting of the Affordable and Fair Housing Policy section of the PID policy. The policy was approved by the Commissioners Court in October 2017. The subcommittee also developed a preliminary framework to conduct reviews of proposed PID petitions to ensure compliance with fair housing requirements and to provide recommendations related to affordable housing and improving opportunity. To date, two review have been completed and one was underway at the close of the PY17 program year.</p>	<p>During PY18, the Affordable Housing Policy committee met on a monthly basis. During PY18, the Committee reviewed drafts of the Analysis of Impediments to Fair Housing Choice, Housing Equity Model, and the Comprehensive Housing Market Study. Additionally, the Committee updated the draft Chapter 277 policy to take into account the new studies, created the decision points for the new Community Benefit Funds policy, and started review and edits of the County's existing Permit Fee Waiver policy.</p>
<p>No action taken.</p>	<p>The County does not have authority to expedite permitting for affordable housing. Through the Affordable Housing Policy Committee, the review of over 40 implementation tools is occurring to determine what options are available to the County.</p>	<p>The County does not have authority to expedite permitting for affordable housing. Through the Affordable Housing Policy Committee, the review of over 40 implementation tools were reviewed to determine what options are available to the County.</p>	<p>The County does not have authority to expedite permitting for affordable housing. Through the Affordable Housing Policy Committee, the review of over 40 implementation tools were reviewed to determine what options are available to the County.</p>
<p>No action taken.</p>	<p>No action taken.</p>	<p>No action taken.</p>	<p>No action taken.</p>

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Impediment #4: Persistence of housing discrimination					
Maintain efforts to identify, understand and eliminate discrimination	Continue education and outreach efforts related to fair housing, including publication of such material online and on the County's TV network	CDBG Office	Proliferation of fair housing information	Ongoing	County website continues to have a fair housing page with resources and information.
	Continue to engage ATC to conduct education and outreach or paired testing in unincorporated areas, focusing on disability discrimination in the rental market	CDBG Office, Commissioners Court	Number of people assisted and/or test conducted	Ongoing	As a part of their CDBG funded fair housing program, Austin Tenant's Council conducts outreach and fair housing counseling to the CDBG service areas.

Goals	Strategies to Meet Goals	Responsible Entities	Benchmark	Year to be Completed	Progress in 2014
Impediment #5: Presence of discriminatory restrictive deeds/covenants					
Remove policy barriers to fair housing opportunity	File a fair housing complaint with HUD or ATC upon encountering any discriminatory restrictive deeds or covenants	CDBG Office	Complaints filed	Ongoing	No complaints filed.

Goals	Strategies to Meet Goals	Responsible Entities	Benchmark	Year to be Completed	Progress in 2014
Impediment #6: Concentration of voucher holders in impacted areas					
Deconcentrate poverty	Increase efforts toward assisting voucher holders to find affordable units in the western half of the County	HATC	Implementation of additional integration strategies	2017	No action taken.
Preserve affordable housing stock	Continue efforts to acquire affordable housing developments before their conversion to market rate	HFC	Number of units preserved	Ongoing	No action taken.

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Impediment #4: Persistence of housing discrimination			
County website continues to have a fair housing page with resources and information.	County website continues to have a fair housing page with resources and information.	County website continues to have a fair housing page with resources and information.	County website continues to have a fair housing page with resources and information.
As a part of their CDBG funded fair housing program, Austin Tenant's Council conducts outreach and fair housing counseling to the CDBG service areas.	As a part of their CDBG funded fair housing program, Austin Tenant's Council conducts outreach and fair housing counseling to the CDBG service areas.	As a part of their CDBG funded fair housing program, Austin Tenant's Council conducts outreach and fair housing counseling to the CDBG service areas.	As a part of their CDBG funded fair housing program, Austin Tenant's Council conducts outreach and fair housing counseling to the CDBG service areas.

Progress in 2015	Progress in 2016	Progress in 2017	Progress in 2018
Impediment #5: Presence of discriminatory restrictive deeds/covenants			
No complaints filed.	No complaints filed.	No complaints filed.	No complaints filed.

Progress in 2015	Progress in 2016	Progress in 2017	Progress in 2018
Impediment #6: Concentration of voucher holders in impacted areas			
No action taken.	The Housing Authority converted all of its public housing units through a RAD conversion. During PY2017, CDBG staff will request to map the location of voucher holders and provide feedback to HATC.	The Housing Authority converted all of its public housing units through a RAD conversion.	The Housing Authority converted all of its public housing units through a RAD conversion.
No action taken.	No affordable housing developments were acquired during the program year.	No affordable housing developments were acquired during the program year.	No affordable housing developments were acquired during the program year.

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Impediment #7: Absence of authority for local oversight of design and construction					
Improve physical accessibility of housing	Contract with ATC to provide training to architects, engineers and other design professionals	CDBG Office	Proliferation of fair housing information	2017-2018	No action taken.
	Continue legislative advocacy in the interest of gaining increased land-use authority and the ability to adopt and enforce a building code	Commissioners Court	Advocacy action complete	2015 & 2017	No action taken.

Goals	Strategies to Meet Goals	Responsible Entities	Benchmark	Year to be Completed	Progress in 2014
Impediment #8: Lack of local human rights or fair housing ordinance					
Maintain efforts to identify, understand and eliminate discrimination	Pass a resolution or proclamation that serves as a government-wide statement of intention to promote fair housing and prohibit discrimination	Commissioners Court	Adoption of such	2016	No action taken.

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Impediment #7: Absence of authority for local oversight of design and construction			
ATC provided a fair housing training in 2015. It was not funded with CDBG funds, but due to our contractual relationship, Travis County was able to refer people to the training.	No trainings were provided during PY 2016.	No trainings were provided during PY 2017.	No trainings were provided during PY 2018.
No Action taken.	Travis County Departments including TNR, HHS (CDBG), HFC and HATC reviewed a variety of bills that attempted to restrict or increase affordable housing, fees and land use during the Legislative Session. The County's land use remains the same with some ability to use certain incentives further restricted. There was a significant push to restrict local authority to both counties and cities by the State Legislature this year. Many of the most egregious bills did not make it out of committee or were not supported.	No action taken.	Travis County Departments including TNR, HHS (CDBG), and TCHFC reviewed a variety of bills that attempted to restrict or increase affordable housing, fees and land use during the Legislative Session. The County's land use remains the same with some ability to use certain incentives further restricted. There was a significant push to restrict local authority to both counties and cities by the State Legislature this year. Many of the most egregious bills did not make it out of committee or were not supported. The Legislature did pass revenue caps restricting the ability of municipalities to increase property tax rates above 3.5% without going to the voters for approval. This has the potential to impact services in response to growth.

Progress in 2015	Progress in 2016	Progress in 2017	Progress in 2018
Impediment #8: Lack of local human rights or fair housing ordinance			
No action taken.	In PY2015, the Commissioners Court approved a set of values to guide affordable housing development which includes these efforts. Additionally, during PY16, the Commissioners Court approved an affordable and fair housing policy to the Public Improvement District policy that clearly delineates the County's role with regard to fair housing.	In PY2015, the Commissioners Court approved a set of values to guide affordable housing development which includes these efforts. Additionally, during PY16, the Commissioners Court approved an affordable and fair housing policy to the Public Improvement District policy that clearly delineates the County's role with regard to fair housing.	In PY2015, the Commissioners Court approved a set of values to guide affordable housing development which includes these efforts. Additionally, during PY16, the Commissioners Court approved an affordable and fair housing policy to the Public Improvement District policy that clearly delineates the County's role with regard to fair housing.

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Impediment #9: Need for improved connections between residents and employment opportunities					
Improve connections between lower-income population and employment opportunities	Continue to collaborate with Cap Metro and CARTS to create innovative solutions that serve particular neighborhood connection needs	CDBG Office	Continued Collaboration	Ongoing	The Department funds van service through CARTS to expand access to transportation from the Del Valle area to employment centers.
	Participate in Cap Metro's long-range planning efforts to promote the expansion of public transit service in non-impacted, high-growth unincorporated areas, particularly ride-to-work routes	CDBG Office	Continued Collaboration	Ongoing	No action taken.
	Prioritize investment criteria to incentivize affordable housing development on major corridors with public transit service	HFC	Implementation of criteria	2016	No action taken.

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Impediment #9: Need for improved connections between residents and employment opportunities			
The Department funds van service through CARTS to expand access to transportation from the Del Valle area to employment centers. CDBG and TC General Fund are jointly funding a bus route expansion in a low to moderate income area service an affordable housing complex and a new homeless micro-housing development.	The Department funds CARTS to provide van service that expands rural transportation access. Travis County Transportation and Natural Resources department partially funds a bus route expansion in a low to moderate income area that provides service to an affordable housing complex and homeless micro-housing development.	The Department funds CARTS to provide van service that expands rural transportation access. Travis County Transportation and Natural Resources department partially funds a bus route expansion in a low to moderate income area that provides service to an affordable housing complex and homeless micro-housing development.	The Department funds CARTS to provide van service that expands rural transportation access. Travis County Transportation and Natural Resources department partially funds a bus route expansion in a low to moderate income area that provides service to an affordable housing complex and homeless micro-housing development.
Commissioners Court members participated on this item.	Commissioners Court members participated on this item. In collaboration with TNR, CapMetro, CARTS and HHS (CDBG), a transit development plan is being developed to draw down FTA funds to provide transit in urbanized areas that are not within CapMetro's current catchment area.	Commissioners Court members participated on this item. In collaboration with TNR, CapMetro, CARTS and HHS (CDBG), a transit development plan was approved in the summer of 2018 to draw down FTA funds to provide transit in urbanized areas that are not within CapMetro's current catchment area.	Commissioners Court members participated on this item. In collaboration with TNR, CapMetro, CARTS and HHS (CDBG), a transit development plan was approved in the summer of 2018 to draw down FTA funds to provide transit in urbanized areas that are not within CapMetro's current catchment area.
No action taken.	In collaboration with TNR, CapMetro, CARTS and HHS (CDBG), a transit development plan is being developed to draw down FTA funds to provide transit in urbanized areas that are not within CapMetro's current catchment area. As a part of this work, affordable housing developments that need access to transit in the ETJ or unincorporated areas will be discussed and considered. Further, the Fair Housing reviews the Affordable Housing Committee has drafted include a review of transit proximity.	In collaboration with TNR, CapMetro, CARTS and HHS (CDBG), a transit development plan was approved in the summer of 2018 to draw down FTA funds to provide transit in urbanized areas that are not within CapMetro's current catchment area. As a part of this work, affordable housing developments that need access to transit in the ETJ or unincorporated areas will be discussed and considered. Further, the Fair Housing reviews the Affordable Housing Committee has drafted include a review of transit proximity.	In collaboration with TNR, CapMetro, CARTS and HHS (CDBG), a transit development plan was approved in the summer of 2018 to draw down FTA funds to provide transit in urbanized areas that are not within CapMetro's current catchment area. As a part of this work, affordable housing developments that need access to transit in the ETJ or unincorporated areas will be discussed and considered. Further, the Fair Housing reviews that the CDBG Office in partnership with the Affordable Housing Committee is doing include a review of transit proximity.

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Impediment #10: Improvements needed in some policy documents					
Increase the strength of fair housing policies	Amend the Affirmative Marketing Plan to include a statement of consequences for noncompliance, which could potentially include a recapture of funds, disallowance of	CDBG Office	Updated AMP	2016	No action taken.
Increase access to programs and services for members of the protected classes	Formalize the Language Access Plan for persons with limited English proficiency	CDBG Office	Completion of Plan	2016	No action taken.
Remove policy barriers to fairhousing opportunity	Update the ACOP to specifically prohibit discrimination against the new classes protected by 2012 changes to HUD program regulation	HATC	Updated ACOP	2016	No action taken.
Impediment #11: Questionable patterns in private lending					
Increase credit access, awareness of discriminatory practices among members of the protected classes	Provide or connect lower-income and minority households to financial counseling and homebuyer education	CDBG Office	Households assisted	Ongoing	The current CDBG funded project for land acquisition to support single family affordable housing development requires 8 hours of homebuyer education.

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Impediment #10: Improvements needed in some policy documents			
No action taken.	Updated, but has not been approved by Commissioners Court yet.	Updated, but has not been approved by Commissioners Court yet.	Updated, but has not been approved by Commissioners Court yet.
Draft created. Ready for legal review and approval.	To be included as an appendix to the Citizen Participation Plan being updated in January 2018.	To be included as an appendix to the Citizen Participation Plan before the end of PY18.	Draft is still pending legal review and approval.
No action taken.	HATC's public housing units went through a RAD conversion; therefore, an ACOP is no longer applicable. HATC will review the comparable document to determine if any updates are needed.	HATC's public housing units went through a RAD conversion; therefore, an ACOP is no longer applicable. HATC will review the comparable document to determine if any updates are needed.	HATC's public housing units went through a RAD conversion; therefore, an ACOP is no longer applicable. HATC will review the comparable document to determine if any updates are needed.
Impediment #11: Questionable patterns in private lending			
The TCHFC's homebuyer assistance program requires homebuyer education for first time homebuyers. The CDBG website has a Housing Resource page that includes link to financial counseling and homebuyer education.	The TCHFC's homebuyer assistance program requires homebuyer education for first-time homebuyers. The CDBG website has a Housing Resource page that includes link to financial counseling and homebuyer education.	The TCHFC's homebuyer assistance program requires homebuyer education for first-time homebuyers. The CDBG website has a Housing Resource page that includes link to financial counseling and homebuyer education.	The TCHFC's homebuyer assistance program requires homebuyer education for first-time homebuyers. The CDBG website has a Housing Resource page that includes link to financial counseling and homebuyer education.