

## Timeline for Phase 1 Analysis of Impediments

| Impediment Action Steps Summary <sup>i</sup>   | Party Taking Action Step | Start Action Step 0-6 months <sup>ii</sup> | Start Action Step 7-12 months | Start Action Step 13-18 months | Start Action Step 19-24 months | Start Action Step 25-36 months | Start Action Step 36+ months |
|--|--------------------------|--|-------------------------------|--------------------------------|--------------------------------|--------------------------------|------------------------------|
| 1-1 Modify existing statute to provide AFFH training for Mortgage brokers                          | Legislature              | XX   |                               |                                |                                | XX                             |                              |
| 1-2 First Time Homebuyer Program (FTHP) additional training for AFFH                               | TDHCA                    |  | XX                            |                                |                                |                                |                              |
| 1-3 Homebuyer education (HBE) classes additional training on fair housing complaint process        | TDHCA                    |  | XX                            |                                |                                |                                |                              |
| 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   |                               |                                |                                | XX                             |                              |
| 1-6 TDHCA working with mortgage associations provide educational materials on AFFH                 | TDHCA                    |  | XX                            |                                |                                |                                |                              |
| 1-7 TDHCA request meeting with lenders and mortgage brokers to discuss HMDA analysis               | TDHCA                    |  |                               | XX                             |                                |                                |                              |
| 1-8 Additional education materials and websites to those participating in TDHCA Programs           | TDHCA                    |  |                               | XX                             |                                |                                |                              |
| 1-9 Financial Literacy for home equity use in Round 2 and other homebuyer programs                 | TDHCA, DR Subs           |  | XX                            |                                |                                |                                |                              |
| 1-10 FTHB data collection on loans acceptance and rejections                                       | TDHCA                    |  |                               |                                | XX                             |                                |                              |

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| 1-11 State should consider imposing the self help housing restrictions on equity stripping.  | Legislature              | XX   |                               |                                |                                | XX                             |                              |
| 2-1 Modify existing statute to provide AFFH training for real estate professionals   | Legislature              | XX   |                               |                                |                                | XX                             |                              |
| 2-2 TDHCA prepare additional real estate professionals in its programs   | TDHCA                    |  |                               | XX                             |                                |                                |                              |
| 2-3 TDCHA provide additional training on how to use its programs to AFFH   | TDHCA                    |  |                               | XX                             |                                |                                |                              |
| 2-4 Include Fair Housing recognition and reporting requirements in HBE courses   | TDHCA                    |  |                               | XX                             |                                |                                |                              |
| 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                             |                              |
| 2-7 TDHCA expand current materials for real estate professionals to include AFFH and use them at existing real estate meetings                             | TDCHA                    |  |                               | XX                             |                                |                                |                              |
| 2-8 TDHCA to work with real estate groups on guidance for professionals to comply with Fair Housing Act  | TDHCA                    |  |                               | XX                             |                                |                                |                              |
| 2-9 TDHCA to adopt a consumer oriented Fair Housing web page   | TDHCA                    |  |                               |                                | XX                             |                                |                              |

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| 2-10 TDHCA will work with attorney CLE providers to develop ethics credit on AFFH   | TDHCA                    |  |                               | XX                             |                                |                                |                              |
| 2-11 Add Fair Housing and AFFH information to First Thursday training   | TDHCA                    |  | XX                            |                                |                                |                                |                              |
| 2-12 TDHCA to work with apartment association representatives to provide leasing agents with training on AFFH or Fair Housing   | TDHCA                    |  |                               |                                | XX                             |                                |                              |
| 2-13 When invited, TDHCA education trainings at apartment association events will include AFFH information  | TDHCA                    |  |                               | XX                             |                                |                                |                              |
| 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                             |                                |                                |                              |
| 2-15 TDHCA and TDRA will require third party consultants using agency funds have training in AFFH   | TDHCA, TDRA              |  |                               | XX                             |                                |                                |                              |
| 2-16 TDHCA establish minimum standards and best practices for affirmative marketing plans   | TDHCA                    |  |                               | XX                             |                                |                                |                              |
| 2-17 Application log for owner or rental housing that tracks protected class status and are tracked by TDHCA  | TDHCA, Subrecipient      |  | XX                            |                                |                                |                                |                              |
| 2-18 TDCHA will require subrecipients to establish affirmative fair housing marketing plans and measure future awards against the success of the plan   | TDHCA, Subrecipient      | XX   |                               |                                |                                |                                |                              |

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| 2-19 All TDHCA TDRA subrecipients awarded contracts must participate in AFFH training | TDHCA,<br>TDRA,<br>Subrecipient | XX   |                               |                                |                                |                                |                              |
| 2-20 TDHCA and TDRA will provide sufficient AFFH staff                                | TDHCA,<br>TDRA                  |  |                               |                                |                                | XX                             |                              |
| 3-1 Produce PSA's on Fair Housing issues  | TDHCA                           |  |                               |                                |                                |                                | XX                           |
| 3-2 Distribution of Fair Housing literature in impacted areas                         | TDHCA,<br>TDRA,<br>Subrecipient |  | XX                            |                                |                                |                                |                              |
| 3-3 Continue to conduct Fair Housing activities                                       | TDRA,<br>TDHCA,<br>Subrecipient | XX   |                               | XX                             |                                | XX                             |                              |
| 3-4 Celebrate Fair Housing Month  | TDRA,<br>TDHCA,<br>Subrecipient | XX   |                               | XX                             |                                | XX                             |                              |
| 3-5 TDHCA TDRA Website/page for statewide fair housing issues                         | TDHCA<br>TDRA                   |  |                               |                                |                                | XX                             |                              |
| 4-1 Nimbyism education and outreach   | TDRA,<br>TDHCA,<br>Subrecipient |  |                               | XX                             |                                |                                | XX                           |
| 4-2 Develop guidance on how to combat Nimbyism  | TDHCA,<br>TDRA,<br>Subrecipient |  |                               | XX                             |                                |                                |                              |
| 4-3 TDHCA to factor components to RAF   | TDHCA                           |  | XX                            |                                | XX                             |                                | XX                           |

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| 4-4 TDHCA to work with Texas A&M on Fair Housing issues   | TDHCA,<br>Texas A&M             |  |                               | XX                             |                                |                                |                              |
| 4-5 Develop a GIS going forward for projects funded with federal/state funds from TDRA and TDHCA  | TDRA,<br>TDHCA                  |  | XX                            |                                |                                |                                |                              |
| 5-1 Review of Long Term infrastructure plans for AFFH success   | TDRA,<br>Subrecipient           |  |                               | XX                             |                                |                                |                              |
| 5-2 Reduce “siloeing” of Fair Housing issues by expanding process into all departments  | Subrecipient                    |  |                               |                                | XX                             |                                |                              |
| 5-3 Require senior staff—including managers and attorneys—of TDRA and TDHCA subrecipients to obtain training in AFFH.   | TDRA,<br>TDHCA,<br>Subrecipient |  | XX                            |                                |                                |                                |                              |
| 5-4 Newly appointed/elected Board member, Commissioner and/or councilmember training in AFFH  | TDRA,<br>TDHCA,<br>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                             |                              |
| 5-7 Non-entitlement communities should look HUD or TDHCA for housing resources to further benefit infrastructure improvement projects                               | Subrecipient                    |  |                               | XX                             |                                |                                |                              |
| 5-8 Infrastructure projects should address access issues—especially in areas like courthouses, community centers and other high traffic areas                       | Subrecipient                    |  | XX                            |                                |                                |                                |                              |

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| 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 <sup>iii</sup>  | Subrecipient                     | XX   |                               |                                |                                |                                |                              |
| 5-10 Consider ways to protect flood impacted low income, protected class, and colonia communities from future flooding   | Subrecipient                     | XX   |                               |                                |                                |                                |                              |
| 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<br>TDRA.<br>TDHCA   |  | XX                            |                                |                                |                                |                              |
| 5-12 Communities located predominately within floodplains should establish clear standards that allow for proper elevation and visitability  | Subrecipient                     | XX   |                               |                                |                                |                                |                              |
| 5-13 Provide a moving to opportunity programs for concentrated disaster survivors  | Subrecipient                     |  | XX                            |                                |                                |                                |                              |
| 5-14 Create a needs assessment to provide guidance impacted groups based on need caused by the storm.  | Subrecipient<br>TDHCA            | XX   |                               |                                |                                |                                |                              |
| 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<br>TDRA             | XX   |                               |                                |                                |                                |                              |
| 5-16 Repair damaged public housing (family and elderly) within 24 months   | Subrecipient<br>TDHCA            | XX   |                               |                                |                                |                                |                              |
| 6-1 Establish testing for Fair Housing issues and include education on self testing  | TDHCA<br>Subrecipient<br>Grantee |  |                               |                                | XX                             |                                |                              |

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| 6-2 TDHCA should conduct a pilot program to provide Fair Housing testing funds to third parties   | TDHCA                             |  |                               |                                | XX                             |                                |                              |
| 6-3 Entities certifying that they are affirmatively furthering fair housing should provide a document providing enforcement information                                       | TDHCA, TDRA, Subrecipient Grantee |  |                               |                                | XX                             |                                |                              |
| 6-4 Place contacts at local state and federal levels for Fair Housing complaints  | Subrecipient Grantee              |  | XX                            |                                |                                |                                |                              |
| 6-5 TDRA and TDHCA will sign an MOU to forward Fair Housing Complaints to TWC   | TDRA TDHCA                        | XX   |                               |                                |                                |                                |                              |
| 6-6 TDHCA and TDRA will request their respective boards to hold board education session on Fair Housing at least every two years  | TDHCA TDRA                        |  |                               | XX                             |                                |                                | XX                           |
| 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                             |                              |
| 7-1 Community review of local building and zoning ordinances and their direct impact on Fair Housing  | Subrecipient Grantee TDRA         |  | XX                            |                                |                                |                                |                              |
| 7-2 Community review of local building and zoning ordinances and their disparate impact on Fair Housing   | Subrecipient Grantee              |  | XX                            |                                |                                |                                |                              |

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| 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                            |                                |                                |                                |                              |
| 7-4 Communities seeking disaster recovery funds for housing should consider expedited permitting and review processes.                                       | Subrecipient Grantee TDHCA |  | XX                            |                                |                                |                                |                              |
| 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                             |                              |
| 8-2 Local governments should review zoning or land use restrictions that limit the ability to accept FEMA provided temporary housing                         | Subrecipient Grantee       |  |                               | XX                             |                                |                                |                              |
| 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                             |                                |                                |                              |
| 8-4 TDHCA develop disaster recovery best practices by January 2012   | TDHCA                      |  | XX                            |                                |                                |                                |                              |
| 8-5 Coalition to look for ways to improve the HUD interpretation of DOB  | TDHCA Subrecipient Grantee | XX   |                               |                                |                                |                                |                              |
| 8-6 TFHCA to monitor HOP Program and issue reports on progress starting in 2012  | TDHCA                      |  | XX                            |                                |                                |                                | XX                           |
| 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                            |                                |                                |                                |                              |

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| 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                            |                                |                                |                                |                              |
| 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   |                               |                                |                                |                                |                              |
| 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                            |                                |                                |                                |                              |
| 10-2 State and COGS will join Advocates requesting an additional 2,500 housing vouchers in the impacted area  | TDRA<br>TDHCA<br>Subrecipient Grantee | XX   |                               |                                |                                |                                |                              |
| 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<br>Subrecipient Grantee         |  |                               |                                | XX                             |                                |                              |
| 10-4 Subrecipients and TDHCA will work with local PHA's on tenant counseling and fair housing education   | TDHCA<br>Subrecipient Grantee         |  |                               |                                | XX                             |                                |                              |
| 10-5 Use, as a research tool on the patterns of Section 8 housing, Appendix M of this AI  | Subrecipient Grantee<br>TDHCA         |  | XX                            |                                |                                |                                |                              |
| 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   |                               |                                |                                |                                |                              |

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| 11-1 TDRA and TDHCA will look for efficiencies in building new houses while still working to meet AFFH including accessibility  | TDRA<br>TDHCA                            | XX   |                               |                                |                                |                                |                              |
| 11-2 Subrecipients should consider density bonuses for developments that look to provide more affordability                     | Subrecipient<br>Grantee                  |  |                               | XX                             |                                |                                |                              |
| 11-3 Subrecipients will include in LURAs a first right of refusal and a period to not allow conversion to market rate units.    | Subrecipient<br>Grantee<br>TDHCA         |  | XX                            |                                |                                |                                |                              |
| 11-4 State should include incentives for adopting AFFH programs   | TDRA<br>TDHCA                            | XX   |                               |                                |                                |                                |                              |
| 11-5 The state and subrecipients should consider using CDBG funds to buy down high cost and high opportunity developments sites | TDRA<br>TDHCA<br>Subrecipient<br>Grantee |  |                               |                                |                                |                                | XX                           |
| 12-1 Conduct the HOP program to AFFH.   | Subrecipient<br>Grantee<br>State         | XX   |                               |                                |                                |                                |                              |
| 12-2 TDHCA will accommodate voucher moving funds is granted vouchers  | TDHCA                                    | XX   |                               |                                |                                |                                |                              |
| 12-3 Jurisdictions receiving HUD funds need to establish Section 3 programs related to local jobs                               | Subrecipient<br>Grantee<br>TDHCA         |  | XX                            |                                |                                |                                |                              |
| 12-4 TDHCA and TDRA will each provide sufficient staff resources regarding Section 3 assistance.                                | TDRA<br>TDHCA                            |  | XX                            |                                |                                |                                |                              |

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| 12-5 Prior to application submission, TDRA and TDHCA will require AFFH training to anyone involved in the applying for HUD funds | TDRA<br>TDHCA                            |  |                               | XX                             |                                |                                |                              |
| 13-1 Subrecipients should consider incentives to get increased set asides of affordable housing for person with special needs.   | Subrecipient<br>Grantee<br>TDHCA         | XX   |                               |                                |                                |                                |                              |
| 13-2 TDHCA should consider additional language to provide service enriched housing in the HTF programs for subrecipients.        | TDHCA                                    |  |                               | XX                             |                                |                                |                              |
| 13-3 TDHCA will review modifications of bond MF bond rules to support development of service enriched housing.                   | TDHCA                                    |  | XX                            |                                |                                |                                |                              |
| 13-4 TDHCA will explore obtaining national Disability Opportunity Funds to help with additional special needs funding.           | TDHCA                                    |  |                               |                                |                                | XX                             |                              |
| 13-5 TDRA and TDHCA will explore how CDBG funds can be used to address service enriched housing.                                 | TDRA<br>TDHCA                            |  |                               |                                |                                | XX                             |                              |
| 13-6 Funding entities should use point incentives for developments proximity to medical facilities                               | TDHCA<br>Subrecipient<br>Grantee         |  |                               |                                | XX                             |                                |                              |
| 13-7 When using federal funds, all homes should have accessibility features included, even if the original owner                 | TDHCA<br>TDRA<br>Subrecipient<br>Grantee | XX   |                               |                                |                                |                                |                              |
| 14-1 COGs will conduct an analysis to determine infrastructure needs of colonias.  | Subrecipient<br>Grantee<br>TDRA          |  |                               |                                | XX                             |                                |                              |

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| 15-1 TDHCA will include insurance related issues in their Homebuyer counseling programs.  | TDHCA Subrecipient Grantee      |  | XX                            |                                |                                |                                |                              |
| 16-1 Continue Fair Housing Training for DR subrecipients.   | TDRA TDHCA                      | XX   |                               |                                |                                |                                |                              |
| 16-2 TDRA and TDHCA should work together to develop a Fair Housing training   | TDRA TDCHA                      |  |                               |                                |                                | 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   |                               |                                |                                |                                |                              |
| 16-4 Subrecipients, TDRA and TDRA will keep adequate records to document compliance with CA and federal laws.                               | TDRA TDHCA Subrecipient Grantee | XX   |                               |                                |                                |                                |                              |
| 16-5 Conduct new AI's or update as necessary. State will conduct a balance of state AI.   | TDHCA Subrecipient Grantee      |  | XX                            |                                |                                |                                |                              |
| 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                            |                                |                                |                                |                              |
| 16-7 Develop and Adopt a FFAST form that will facilitate compliance with this AI for local communities                                      | TDRA TDHCA                      | XX   |                               |                                |                                |                                |                              |

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- <sup>i</sup> The Summary statements and Party taking the Action Step are only for identification purposes. In the event of any conflict between this timeline and the action step found in Section 8 of this AI, the action step in Section 8 will control, including the party taking the action step.
- <sup>ii</sup> The estimated times for action steps are when the program is anticipated to begin from the time the contract for funding is signed by the Grantee or Subrecipient. Additionally, as stated in the Notes of of Section 8, it is anticipated that these action steps will begin with Round 2 Phase 2 of the Disaster Recovery Program. However, as new application rounds, NOFA's or rules come up for release or review after the AI is approved, it is anticipated that the actions steps will be included in those application rounds, funding releases or rules as applicable for HUD housing and CDBG programs.
- <sup>iii</sup> A Subrecipient or Grantee submitting a FFAST form may not have completed all action steps called for in this AI. The FFAST form should include a statement of when or how the Grantee or Subrecipient will comply with the Action Step that is not anticipated to be started until after the FFAST Form is submitted.