



Lower Rio Grande Valley Development Council

Impediment #5

6. Communities electing to provide publicly financed housing incentives should be requested to call for recipients to engage in affirmative marketing.

- We have a policy requiring Affirmative Marketing Plans from developers seeking tax abatements or other supports for new housing.
- We do not have such a policy and will develop and implement one.

When will you do this? 2011 2012

- Not Applicable (Explain)

The LRGVDC will need the remainder of the year of 2011 to review potential sources of publicly financed housing incentives and will develop and implement a policy that requests recipients to engage in affirmative marketing in 2012.

11. If applicable, all policies should be reviewed regarding denying applicants' access to disaster recovery CDBG funds if their residence is located in the flood plain. If the policy does not allow participation by restricting building in flood plains, then the policy should be assessed to see if alternative housing programs could be implemented for the residents. Local jurisdictions should analyze the results and see if protected classes are more frequently harmed by flood plain restrictions. This action does not apply to the GLO CDBG Disaster Relief Fund that limits property purchase "unless TXCDBG receives satisfactory evidence that the property to be purchased was not constructed or purchased by the current owner after the property site location was officially mapped and included in a designated flood plain."

- We have completed this review and analysis and will take action on our findings.
- We have not completed this review and analysis. We will do so and take appropriate actions based on our findings for Round 2 programs.

When will you do this? 2011 2012

- Not Applicable (Explain)



Lower Rio Grande Valley Development Council

The LRGVDC has not and will not deny applicants' access to disaster recovery CDBG funds if their residence is located in the flood plain. However, the LRGVDC has not recorded such findings at this time. The LRGVDC will need the remainder of the year 2011 to complete a thorough review and analysis then will record these findings in the year 2012.

13. Local jurisdictions that accommodated the relocation of disaster survivors resulting in concentrations of protected class survivors in specific areas should establish Moving to Opportunity Programs and include renters in their Moving to Opportunity Programs as defined under Round 2.

- This action step applies to our jurisdiction. We will establish a Moving to Opportunity Program for disaster survivors as part of our Round 2 housing recovery program.

When will you do this? 2011 2012

- Not Applicable (Explain)

The LRGVDC does not have concentrations of protected class survivors of disasters due to relocation at this time. Because this may occur for future disasters, the LRGVDC will establish a Moving to Opportunity Program for disaster survivors as part of our Round 2 housing recovery program when the funds flow to the LRGVDC in either 2011 or 2012.

Impediment #6

Governmental entities at all levels do not appear to have been proactive in the enforcement of both the Fair Housing Act and the obligation to affirmatively further fair housing. The State and subrecipients should implement a robust and effective structure for identifying and pursuing suspected violations.

1. Given the potential for increase in Fair Housing enforcement action by federal and state agencies and private organizations, an ongoing fair housing testing program for areas that receive federal housing and community development funds could be beneficial to protect state agencies and sub-recipients from potential repayment. Fair housing enforcement is a valid use of CDBG funding and can be used to establish testing programs by agencies trained in HUD testing procedures. The state, or local jurisdictions combining together, should consider conducting tests in areas that include the following: steering in sales and rental; the denial of and different terms and conditions based on race, national origin, familial status, and disability in sales and rental; predatory and disparate terms and conditions in lending and insurance; and foreclosure modification schemes targeting minority neighborhoods. The state should also consider education to applicable entities on self-testing and self-correction.



Lower Rio Grande Valley Development Council

- We currently have a testing program for Fair Housing violations. For more information.
- We do not have a testing program for Fair Housing violations and plan to establish one.

When will you do this? 2011 2012 2013

The LRGVDC will adopt a resolution that supports testing in their region and requires local jurisdictions to pass similar resolutions.

The LRGVDC will participate in any testing recommended or implemented by other organizations such as state and local communities.

The LRGVDC will also work with local/regional groups, the State, and HUD to create the testing.

The LRGVDC will also look into additional funding sources and avenues that would allow for annual testing at the regional level.

- Not Applicable (Explain)