

## **EXECUTIVE SUMMARY**

### **CITY OF NEW BRAUNFELS, TEXAS**

#### **CONSOLIDATED ANNUAL PERFORMANCE AND EVALUATION REPORT**

##### **PROGRAM YEAR 2024**

This Consolidated Annual Performance and Evaluation Report (CAPER) provides the City of New Braunfels an opportunity to examine the status and accomplishments of the activities which were funded through the Community Development Block Grant (CDBG) program during CDBG Program Year 2024 (October 1, 2024, through September 30, 2025) and measure the performance of the accomplishments in respect to goals in the Consolidated Plan.

The 2020 - 2024 Consolidated Plan, adopted on July 27, 2020, reflects a citizen-based vision for housing and community development activities. This five-year plan identifies priority needs, goals and objectives, and specific community development activities necessary to achieve this vision. Each year, using the Consolidated Plan as a base, the City prepares an Annual Action Plan that provides proposed uses of CDBG funds for the year and a CAPER that gives an evaluation of the use of those funds. The CAPER provides the City Council and the citizens of New Braunfels with a tool that can be used to examine past accomplishments of the CDBG program. It also acts as a planning document to identify future programs and opportunities.

The City of New Braunfels received \$495,919 in Community Development Block Grant (CDBG) funds for the Program Year 2024 (PY24) from the U.S. Department of Housing & Urban Development (HUD). Additionally, \$126,827.15 was available in unallocated funds from previous Program Years for eligible activities. Based on the priorities identified in the 2020-2024 Consolidated Plan, a total of \$622,746.15 in CDBG funding was allocated to public service activities, public facilities, housing activities, and administration of the CDBG program.

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

The City obligated 15% (\$74,387.85) to Public Services. This amount is capped at this percentage by federal regulations and is based on the current program year grant. Program Administration is capped by federal regulations at 20% of the current program year grant. \$99,183.80 was allocated to Program Administration, and \$449,174.50 was allocated to housing, and public facilities activities.

Funded Projects for PY24 were:

- Public Services
  - Big Brothers Big Sisters: \$13,000
  - CASA of Central Texas: \$9,855
  - Crisis Center of Comal County: \$10,000

- Family Life Center: \$15,000
- National Church Residences Foundation: \$10,000
- San Antonio Food Bank: \$14,532.85
- The Salvation Army: \$2,000
- Housing
  - City of New Braunfels Minor Home Repair Program: \$90,800
  - Comal County Habitat for Humanity - Home Repair Program: \$20,000
- Public Facilities
  - Crisis Center of Comal County: \$125,000
  - NB Housing Partners: \$73,756
  - New Braunfels Youth Collaborative: \$60,000
  - The Salvation Army: \$79,618.50
- Administration: \$99,183.80

Using CDBG funding, a total of 1,342 unduplicated low-moderate income residents of New Braunfels benefited from a public service activity. The public facility projects assisted 593 unduplicated low-moderate income residents. The projects for the Crisis Center of Comal County and NB Housing Partners are under construction. Beneficiaries will be determined once the projects are completed and clients are receiving shelter housing and services. Three low-moderate income homeowners received minor home repairs, weatherization, and accessibility improvements through the City's Minor Home Repair Program. Due to unforeseen circumstances, Comal County Habitat for Humanity paused its Home Repair Program during PY24, and no CDBG funds were used for the activity.

#### **CDBG-CV**

Additionally, the City utilized a total of \$666,921 (CDBG-CV Rounds 1 & 3) provided by the CARES Act, and \$68,923 of unallocated CDBG PY19 funds to address needs created by the COVID pandemic. Through a competitive process, all CDBG-CV funds were allocated to seven local non-profit organizations providing a variety of public services to New Braunfels' residents affected by COVID. All agencies completed their awarded activities, with a remaining funding balance of \$70,385.64. These funds were reallocated to River City Advocacy, a local non-profit mental health service provider, after a substantial amendment was approved by the City Council and the Department of Housing & Urban Development (HUD) in February 2024. As of September 30, 2025, 98% of the City's CDBG-CV funding has been expended.

#### **Information Contained in PY24 CAPER**

The PY24 CAPER includes the following components:

- PY24 Goals and Outcomes
- Detailed information on how CDBG and CDBG-CV funds were expended toward the priorities identified in the 2020-2024 Consolidated Plan.

- Charts that outline the number and types of persons assisted including race, ethnicity, and income levels.
- Other pertinent and required information regarding the status of CDBG and CDBG-CV funded projects administered by the City of New Braunfels.

### **Citizen Participation**

Prior to the submission of the PY24 CAPER to HUD, the City made the CAPER available for review and comments from the residents of New Braunfels. A Public Notice about the CAPER and the public hearing was placed in the Herald-Zeitung, the local newspaper, and on the City's website in English and Spanish on November 21, 2025. The public comment period was held to allow citizen review of the PY24 CAPER from November 24, 2025, through December 10, 2025, thereby meeting the comment period as required by program regulations. The draft CAPER was available in English on the City's website and paper copies could be viewed at the New Braunfels City Hall, the New Braunfels Public Library Main Branch, and the New Braunfels Public Library – Westside Branch. Additionally, the draft CAPER was available in Spanish upon request. Public participation is encouraged during the planning, implementation, and reporting of all CDBG programs. All interested people were encouraged to submit written or verbal comments on the report to Christopher Greenwell, Grants Coordinator. The public was also invited to appear and be heard at a Public Hearing hosted in the Tejas room and New Braunfels City Hall on December 2nd, 2025.

The City did not receive any citizen comments on the PY24 CAPER during the comment period or at the public hearing.

## **CR-05 - Goals and Outcomes**

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

This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.

During Program Year 2024 (PY24), the City of New Braunfels, Texas, provided Community Development Block Grant (CDBG) funding, issued to the City by the U.S. Department of Housing & Urban Development (HUD), for projects designed to address the identified needs of the community and identified in the 2020 - 2024 Consolidated Plan. In partnership with local non-profit agencies, CDBG funded supportive social and housing services to 1,342 unduplicated New Braunfels residents. With this funding, seven agencies provided the following services: mentoring at-risk children, advocacy for abused and neglected children, elderly residing in subsidized rental housing, mental health counseling, emergency food for those experiencing food insecurity, supportive services for transitional housing, and emergency rent and utility services. Additionally, several agencies received funding for their projects at four public facilities, and the City of New Braunfels' Minor Home Repair program provided needed repairs for three low-income New Braunfels' residents to improve their living environment and allow senior residents to remain in their homes.

Additionally, the City utilized a total of \$666,921 (CDBG-CV Rounds 1 & 3) provided by the CARES Act, and \$68,923 of unallocated CDBG PY19 funds to address needs created by the COVID pandemic. Through a competitive process, all CDBG-CV funds were allocated to-profit organizations providing a variety of public services to New Braunfels' residents affected by COVID. All agencies completed their awarded activities, with a remaining funding balance of \$70,385.64 which was reallocated to River City Advocacy, a local non-profit mental health service provider, after a substantial amendment was approved by HUD in February 2024. As of September 30, 2025, 98% of the City's CDBG-CV funding has been expended.

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

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

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
ADMINISTRATION (AD) 5.1	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0	0.00%	0	0	0.00%
ADMINISTRATION (AD) 5.1	Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0	0.00%	0	0	0.00%
ADMINISTRATION (AD) 5.1	Non-Housing Community Development	CDBG: \$	Rental units rehabilitated	Household Housing Unit	0	0	0.00%	0	0	0.00%
ADMINISTRATION (AD) 5.1	Non-Housing Community Development	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	0	0	0.00%	0	0	0.00%
ADMINISTRATION (AD) 5.1	Non-Housing Community Development	CDBG: \$	Other	Other	10	6	60.00%	2	2	100.00%
DEMOLITION ACTIVITIES (DA) 4.1	Non-Housing Community Development	CDBG: \$	Buildings Demolished	Buildings	1	0	0.00%	0	0	0.00%
ECONOMIC DEVELOPMENT (ED) 3.1	Non-Housing Community Development	CDBG: \$	Jobs created/retained	Jobs	1	0	0.00%	0	0	0.00%

ECONOMIC DEVELOPMENT (ED) 3.2	Non-Housing Community Development	CDBG: \$	Businesses assisted	Businesses Assisted	1	0	0.00%	0	0	0.00%
HOUSING NEEDS (HN) 1.1	Affordable Housing	CDBG: \$	Direct Financial Assistance to Homebuyers	Households Assisted	25	1	4.00%	0	0	0.00%
HOUSING NEEDS (HN) 1.2	Affordable Housing	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	20	10	50.00%	0	0	0.00%
HOUSING NEEDS (HN) 1.3	Affordable Housing	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	20	8	40.00%	8	3	37.50%
HOUSING NEEDS (HN) 1.4	Affordable Housing	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	30	0	0.00%	0	0	0.00%
HOUSING NEEDS (HN) 1.5	Affordable Housing	CDBG: \$	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	0	0	0.00%	0	0	0.00%
HOUSING NEEDS (HN) 1.5	Affordable Housing	CDBG: \$	Rental units rehabilitated	Household Housing Unit	50	108	216.00%	0	0	0.00%
HOUSING NEEDS (HN) 1.5	Affordable Housing	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	0	0	0.00%	0	0	0.00%

HOUSING NEEDS (HN) 1.6	Homeless	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	56	560.00%	0	0	0.00%
HOUSING NEEDS (HN) 1.6	Homeless	CDBG: \$	Homeless Person Overnight Shelter	Persons Assisted	0	0	0.00%	0	0	0.00%
HOUSING NEEDS (HN) 1.6	Homeless	CDBG: \$	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	1	0	0.00%	0	0	0.00%
HOUSING NEEDS (HN) 1.7	Homeless	CDBG: \$	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	48	37	77.08%	0	0	0.00%
PUBLIC FACILITIES (SLE) 2.1	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1	0	0.00%	0	0	0.00%
PUBLIC FACILITIES (SLE) 2.1	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	0	0	0.00%	4650	2325	50.00%

PUBLIC FACILITIES (SLE) 2.2	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1	1321	132,100.00%	0	0	0.00%
PUBLIC SERVICES (SLE) 2.10	Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	600	562	93.67%	100	73	73.00%
PUBLIC SERVICES (SLE) 2.11	Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1125	1397	124.18%	376	340	90.43%
PUBLIC SERVICES (SLE) 2.12	Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1	285	28,500.00%	133	128	96.24%
PUBLIC SERVICES (SLE) 2.12	Non-Housing Community Development	CDBG: \$	Homeless Person Overnight Shelter	Persons Assisted	0	74	7400.00	0	0	0.00%
PUBLIC SERVICES (SLE) 2.13	Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1	85	8,500.00%	30	24	80.00%



PUBLIC SERVICES (SLE) 2.13	Non-Housing Community Development	CDBG: \$	Homeless Person Overnight Shelter	Persons Assisted	0	0	0.00%	0	0	0.00%
PUBLIC SERVICES (SLE) 2.6	Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	175	550	314.29%	100	588	588.00%
PUBLIC SERVICES (SLE) 2.6	Non-Housing Community Development	CDBG: \$	Homeless Person Overnight Shelter	Persons Assisted	0	121	12100.00%	0	0	0.00%
PUBLIC SERVICES (SLE) 2.7	Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	100	356	356.00%	38	174	457.89%
PUBLIC SERVICES (SLE) 2.7	Non-Housing Community Development	CDBG: \$	Homelessness Prevention	Persons Assisted	0	215	21500.00%	0	174	17400.00%
PUBLIC SERVICES (SLE) 2.8	Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	100	303	303.00%	10	10	100.00%
PUBLIC SERVICES (SLE) 2.9	Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	25	26	104.00%	0	0	0.00%

PUBLIC SERVICES (SLE) 2.9	Non-Housing Community Development	CDBG: \$	Homeless Person Overnight Shelter	Persons Assisted	0	13		0	0	0.00%
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**Table 1 - Accomplishments – Program Year & Strategic Plan to Date**

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

The City utilized CDBG funds to address the housing and non-housing community needs of its residents. The 2020-2024 Consolidated Plan and PY24 Annual Action Plan served as the baselines for measuring program effectiveness. PY24, which began on October 1, 2024, and ended on September 30, 2025, was the fifth and final year of the 2020-2024 Consolidated Plan for the Community Development Block Grant (CDBG) program. During PY24, the City of New Braunfels invested CDBG funds to provide:

**Affordable Housing:** Recognizing the need for housing assistance, the City created a city-managed minor home repair program and provided crucial repairs to three low-moderate income homeowners during PY24. Funding had been awarded to Comal County Habitat for Humanity for their minor home repair program. Unfortunately, the organization is undergoing a reorganization and was unable to utilize the funds.

**Homelessness:** The City provided CDBG funds to Family Life Center for their homeless prevention program. During PY24, 174 low-moderate income New Braunfels residents received emergency rent and/or utility assistance to prevent eviction and/or discontinuation of utility services. The City provided CDBG funds for the development or expansion of emergency shelter facilities for Crisis Center of Comal County, and NB Housing Partners. The City continued to actively participate in the Comal County Homeless Coalition; City representatives included staff from the Police Department, the Library’s Westside Community Center, and the CDBG program staff from the Finance Department.

**Public Facilities & Infrastructure Improvements:** During PY24, the City allocated funding for two public facilities projects. The Salvation Army received funding to replace the aging HVAC unit in their main building that provides supportive services and meals to low-income and homeless New Braunfels residents. New Braunfels Youth Collaborative received funding to support the redevelopment of a gym providing recreational activities to New Braunfels youth.

**Public Services:** The City allocated 15% of the PY24 grant to agencies that provided a variety of supportive social services to 754 low-mod income residents of New Braunfels. CDBG funding was allocated to seven agencies that provided the following services: mentoring at-risk children; court

advocacy for abused and neglected children; emergency food for New Braunfels residents experiencing food insecurity; case management for transitional housing residents; emergency rent and utility services; supportive services for emergency shelter residents; and supportive services for elderly residents residing in subsidized rental housing.

**Fair Housing:** During PY24, the City continued to monitor the issues identified in the Analysis of Impediments to Fair Housing Choice that was updated in PY22. Additionally, the Analysis of Impediments to Fair Housing Choice was reviewed during the development of the 2025-2029 Consolidated Plan in PY24. As such, information was presented and discussed at all CDBG meetings and during monitoring with subrecipients. The City maintains Fair Housing information on their website and has a Fair Housing officer on staff. There were no Fair Housing complaints filed with the City during PY24.

## CR-10 - Racial and Ethnic composition of families assisted

Describe the families assisted (including the racial and ethnic status of families assisted).

91.520(a)

	CDBG
White	804
Black or African American	164
Asian	6
American Indian or American Native	5
Native Hawaiian or Other Pacific Islander	<u>1</u>
	980
<b>Total</b>	
Hispanic	519
Not Hispanic	<u>461</u>
	980

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

Table of Assistance by Racial and Ethnic Populations	
White	804
Black-African American	164
Asian	6
American Indian or American Native	5
Native Hawaiian or Other Pacific Islander	<u>1</u>
TOTAL	980
American Indian or American Native & White	1
Asian & White	4
Black-African American & White	19
American Indian or American Native & Black	0
Multi-Racial	332
TOTAL	<u>356</u>
COMBINED TOTAL	1,336
Hispanic	663
Non-Hispanic	<u>673</u>
Total	1,336

### Narrative

During PY24, subrecipients of CDBG funding were required to submit monthly performance and beneficiary reports. Information on the racial and ethnic characteristics and income of the individuals, families or households assisted was entered into IDIS.

The above chart does not accurately reflect the number of beneficiaries by Race and Ethnicity for PY24 as it does not include all the race categories that are reported in IDIS and did not capture all the beneficiaries for the race categories in the above chart. The total number of beneficiaries receiving public services for PY24 was ~~[MISSING NUMBER]~~.1336.

Two public facility projects were completed during PY24. The New Braunfels Youth Collaborative completed the renovation of its gym in July 2025 and reported a total of 39 beneficiaries. The Salvation Army utilized CDBG funds to replace an inadequate and failing HVAC system to support 554 beneficiaries. As of September 30, 2025, the PY24 public facility projects for the Crisis Center of Comal County, and NB Housing Partners are under construction. Beneficiaries will be documented in IDIS when the projects are completed, and clients are being housed. Three low-moderate income homeowners received minor home repairs, weatherization, and accessibility improvements through the City's Minor Home Repair Program.

The beneficiary information was verified by the monthly reports from the subrecipients and the PR03.

#### CDBG-CV funds

During PY24, River City Advocacy provided mental health services to ninety-two low-moderate income residents continuing to experience trauma from the COVID pandemic.

<b>CDBG-CV - Table of Assistance by Racial &amp; Ethnic Populations - PY24</b>	
White	86
Black-African American	3
Asian & White	1
Black-African American & White	2
TOTAL	92
Hispanic	35
Non-Hispanic	57
TOTAL	92

## CR-15 - Resources and Investments 91.520(a)

### Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	622,746	

Table 3 - Resources Made Available

### Narrative

The PY24 Action Plan was developed based on committing the PY24 entitlement grant of \$495,919 plus \$126,827.15 from previously unallocated CDBG program year funds for a total of approximately \$622,746.

CDBG-CV expenditures during PY24 were \$59,972 with a remaining balance of \$10,413.64. It is anticipated that all of the CDBG-CV funds will be expended by early 2026.

### Identify the geographic distribution and location of investments

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

Table 4 – Identify the geographic distribution and location of investments

### Narrative

The area covered by this CAPER is the City of New Braunfels, Texas, which is located within Comal and Guadalupe Counties. There are areas within New Braunfels that are designated as eligible for CDBG funding based on the percentage of low-moderate income residents. Per its exception percentage ratio, at least 43.90 percent of low-moderate income residents occupy these areas of New Braunfels.

All activities funded in PY24 were designed to directly assist eligible low-moderate income persons, households, and/or limited clientele beneficiaries city-wide within the limits of New Braunfels. One hundred percent of CDBG funds were used exclusively for low-moderate income residents. Public Service activities supporting income-eligible persons were conducted city-wide by subrecipients. Housing activities consisted of city-wide minor home repair projects for residents in accordance with the program operated by the City of New Braunfels. Eligibility was confirmed utilizing the most current HUD income guidelines. The PY24 Public Facility projects conducted by New Braunfels Youth Collaborative, Crisis Center of Comal County, the Salvation Army, and NB Housing Partners provided services and shelter to those who met one of the limited clientele/presumed benefit categories.

## **Leveraging**

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

Subrecipients of CDBG funding from the City of New Braunfels are expected to leverage the CDBG funds with other private, state, or local funds. This information is built into applications for funding and taken into consideration when funding recommendations are made by the Community Development Advisory Committee to the City Council. For PY24, CDBG obligated \$74,387.85 for activities that support public services. The agencies were to provide \$14,887,358.15 in funding for their programs resulting in CDBG being 0.48% of the total funding. Additionally, CDBG obligated \$449,174.50 for PY24 public facility projects. The agencies were to provide leveraging of \$9,531,599 for the projects resulting in CDBG being 2.64% of the total funding. The non-profit subrecipients were to use additional funding sources such as foundations, private donations, fundraisers, state, and federal funding to support their programs and projects. The Minor Home Repair Program managed by the City of New Braunfels received 100% CDBG funding of \$90,800.

When CDBG funds are used for City projects such as parks, community centers and infrastructure improvements, these projects typically include funding from other resources such as the general fund or other grant funds. During PY24, there were no projects that used publicly owned land or City property located within the city limits of New Braunfels.

## CR-20 - Affordable Housing 91.520(b)

Evaluation of the jurisdiction's progress in providing affordable housing, including the number and types of families served, the number of extremely low-income, low-income, moderate-income, and middle-income persons served.

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	1,025	0
Number of Non-Homeless households to be provided affordable housing units	38	0
Number of Special-Needs households to be provided affordable housing units	133	133
<b>Total</b>	<b>1,196</b>	<b>0</b>

Table 5 – Number of Households

The PY24 Annual Action Plan has zeros for the one-year goals for the three categories in the above chart. The goal of 1,025 refers to the public facility projects for the Crisis Center of Comal County (525) and NB Housing Partners (500). These projects are under construction and will provide emergency shelter only and will not produce any housing units for homeless households. The goal of 38 reflects the Family Life Center program that provides emergency rent and utility assistance only. The goal of 133 refers to two subsidized multi-family rental properties located in New Braunfels that are owned and operated by National Church Residences Foundation. The properties provide affordable rental units to low-income residents, aged 62 or older.

	One-Year Goal	Actual
Number of households supported through Rental Assistance	38	174
Number of households supported through The Production of New Units	0	0
Number of households supported through Rehab of Existing Units	10	3
Number of households supported through Acquisition of Existing Units	0	0
<b>Total</b>	<b>48</b>	<b>0</b>

Table 6 – Number of Households Supported

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

The minor home repair program operated by City of New Braunfels provided accessibility, and aging in place improvements to allow low-moderate income homeowners to continue to live independently in



their homes, and weatherization improvements to provide a safer home with reduced utility costs. During PY24, the City completed three minor home repair projects. Due to the City's procurement process and policies, there were significant delays in the program implementation and therefore, the City did not meet the expected goal of 10 projects.

**Discuss how these outcomes will impact future annual action plans.**

The City has re-evaluated their Minor Home Repair program and made the decision to not continue the program in PY25. A subrecipient agency has been allocated PY25 funding for a minor home repair program. The agency has worked with the City's Minor Home Repair program and is aware of the regulations and CDBG Policies and Procedures to ensure successful implementation of their program.

During PY24, the City provided technical assistance to subrecipients that were not meeting contracted goals or had new staff who were responsible for reporting and managing the CDBG funded programs. Per the subrecipient agreement and its supporting CDBG Policies & Procedures, agencies who do not perform at contracted levels are not only at risk of cancellation of their contract but adherence to a subrecipient's contracted goals and performance measures is also a factor in determining future CDBG funding. For example, the CDBG application for potential subrecipients includes weighted criteria for an applicant's previous performance, if applicable, so the number of points that they receive during review of their application is raised or lowered based upon whether or not they met program goals for previous CDBG grant awards.

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

Number of Households Served	CDBG Actual	HOME Actual
Extremely Low-income	2	0
Low-income	1	0
Moderate-income	0	0
<b>Total</b>	<b>3</b>	<b>0</b>

**Table 7 – Number of Households Served**

**Narrative Information**

Minor home repair projects conducted in the City of New Braunfels meet the Section 215 definition of affordable housing. PY24 housing projects addressed the worst-case needs by providing funding for accessibility improvements and weatherization for low to moderate income homeowners. Prior to project approval, the completed HUD Income form and third-party documentation of income was reviewed to determine that the homeowner met the low-moderate income limits set by HUD. The City also verified ownership of the property and reviewed the Scope of Work to determine if all items were eligible per CDBG regulations and that the items were in the agency's approved budget. Having already completed a Tier 1 environmental review at the beginning of PY24, the City then confirmed project

eligibility and performed a site-specific environmental review for homes identified by the agency during PY24 before approving proposed projects.

The minor home repair program funded in PY24 provided assistance with accessibility improvements, weatherization, energy efficiency, and homeowner safety for a total cost not to exceed \$10,000 per home resulting in property values that did not significantly increase, and none exceeded 95% of the original purchase price as noted when reviewing the property values on the Comal County Appraisal District's website after repairs were completed.

With CDBG funding, emergency rent and utility assistance were provided as means of homelessness prevention to 174 income-eligible New Braunfels residents to prevent eviction and discontinuation of utilities. Client income, race, ethnicity, and household head information was collected for all the programs and entered into IDIS.

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

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

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

In New Braunfels, agencies provide outreach services for the specific population that they serve, i.e., victims of domestic violence and youth. In PY24, general outreach to homeless persons included distribution of information regarding services and housing by local agencies, local churches that operate food pantries, non-profit agencies, local school districts, and by governmental entities. The City continued its partnership with local agencies that provide outreach services, especially to persons that are unsheltered in the area. Members of the Comal County Homeless Coalition assessed individual needs through the Point in Time and Housing Inventory enumerations that are conducted every January.

The goals listed in the PY24 Annual Action Plan were achieved as listed below:

GOAL - Funding for the continuation and further development of homeless shelters and transitional housing sites.

OUTCOME – During PY24, the City provided funding for the construction of a new domestic violence shelter and for the expansion of the homeless shelter for adults. Total funding was \$198,756.

GOAL - Continued discussions on shelter, transitional housing, and permanent supportive housing needs with local agencies.

OUTCOME - The City held individual and stakeholder meetings with housing and public service agencies during PY24 to identify on-going and unmet needs.

GOAL - Continued funding for emergency rent and utility assistance programs with PY24 CDBG funds.

OUTCOME - During PY24, the City provided \$15,000 for emergency rent and utility assistance to prevent eviction or discontinuation of utility service which could result in homelessness.

GOAL – Provide supportive services to victims of domestic violence that are residing in emergency shelter and adults residing in transitional housing.

OUTCOME – During PY24, the City provided CDBG funding of \$10,000 for supportive services for shelter residents and \$2,000 for case management for a transitional housing program.

GOAL - Continued participation in the Comal County Homeless Coalition.

OUTCOME - During PY24, representatives from the Library, Police, and Finance departments attended monthly Coalition meetings. City staff participated in the annual Point-in-Time count in January 2024.

GOAL - Continue discussions with public institutions so people are not discharged into homelessness.

OUTCOME – Through the Comal County Homeless Coalition, the City continued to meet with public institutions to develop more comprehensive plans to prevent discharge into homelessness.

### **Addressing the emergency shelter and transitional housing needs of homeless persons**

A homeless shelter was a high priority identified in the 2020-2024 Consolidated Plan. First Footings, the City's first homeless shelter for adults, was opened by NB Housing Partners in January 2021 at a temporary location in New Braunfels. Utilizing City-awarded ARPA funding, a permanent site was created and began operating in PY23. ARPA funds are also being used to develop transitional housing. NB Housing Partners received PY24 CDBG funds to continue development of the homeless shelter to include additional bed space, dining room, offices and a pet kennel. During PY24, the average number of persons residing in the shelter was 40 per month. The Crisis Center of Comal County, Hill Country MHDD, and NB Housing Partners continued to collaborate to provide outreach to identify the needs of unsheltered homeless persons and also case management for those residing in shelters.

The Salvation Army continued to operate a transitional housing program for adult males and families with children who have experienced homelessness with the average length of stay between 12 and 24 months.

In a secure temporary location, the Crisis Center of Comal County operated an emergency shelter for victims of domestic violence and/or sexual assault while continuing construction of its new emergency shelter which will also include onsite transitional housing. During PY24, construction continued on the new emergency shelter and is expected to be completed by the end of 2025. PY24 CDBG funding was also leveraged by the Crisis Center of Comal County with City-awarded ARPA funding for their public facility projects. All programs provide case management and other supportive services to residents of the shelters and to those who need services but choose not to stay in a shelter.

Additionally, using City-awarded ARPA grant funds, the San Antonio Food Bank continued development of a transitional multi-family housing project that will provide 51 units of affordable rental housing when completed.

### **Helping low-income individuals and families avoid becoming homeless, especially extremely**

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

Preventing homelessness is a high priority for the City of New Braunfels, and the Comal County Homeless Coalition. During PY24, the City supported programs that help families and individuals stabilize and resolve financial issues before they become homeless by providing emergency rent/utility assistance for households at imminent risk of eviction or a discontinuation of utility services. The City will continue to use CDBG funds to support programs that address housing and public service issues such as providing minor home repairs, food assistance, emergency rental and utility assistance, and case management services.

As part of the Continuum of Care planning with the Comal County Homeless Coalition, the City continues to work with service and housing providers to develop mechanisms that prevent discharge from public institutions into homelessness. To ensure that individuals are not discharged into homelessness, area facilities and institutions have policies with the following safeguards:

**Foster Care:** Case managers within the Texas Department for Family and Protective Services ensure a plan is in place for each youth leaving the system, including naming a destination or facilitating transition to private supervision. The plan takes the well-being of the youth into account and follow-up interviews take place to ensure shelter, family, and stability. For foster care youth who are aged out of the foster care system, TDPRS ensures access to educational and vocational opportunities, financial options, and available mental health and substance abuse services.

**Health Care:** Area hospitals have policies ensuring persons being discharged receive case management on placement needs to ensure patients will not be discharged into homelessness but, instead, to appropriate housing programs and facilities. Homeless and social service providers regularly collaborate with discharge staff to identify patient needs and ensure that patients are not discharged into homelessness.

**Mental Health:** By networking with family, community agencies, and with the patient, mental health providers work to ensure patients have a place to reside prior to being discharged. This plan includes where the patient will live, whether with family, in a basic care or adult foster care facility, or other care facility. Other local, state, or governmental agencies are also consulted to ensure ongoing stability and support services.

**Corrections Facilities:** The Texas Department of Criminal Justice works with discharge planners to ensure inmates have a smooth transition into communities. Parole officers or case managers provide personalized plans to assist inmates with specific needs and provides information on local agencies and service providers.

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

The City of New Braunfels partnered with several local nonprofit service providers during PY24 to help homeless persons obtain and maintain affordable housing and prevent residents from becoming homeless again.

The Next Step project is a comprehensive, collaborative effort between NB Housing Partners, Hill Country MHDD, and the Crisis Center of Comal County. The initiative brings the shelter and housing services of the Crisis Center of Comal County, and NB Housing Partners' First Footing shelter together with mental health services provided by Hill Country MHDD. The Next Step project assisted with housing navigation and followed individuals who were housed to ensure housing stability is maintained. The project's goals were also to strengthen the community's capacity to provide affordable housing options as well as a full spectrum of mental health services and treatment for substance use disorders.

Connections Individual Services provided transitional housing for homeless and at-risk youth combined with case management and supportive services which helped to equip youth with the skills needed to secure and maintain housing when they graduate from the program.

The San Antonio Food Bank continued to construct the Apple Seed project which will be a 51-unit apartment complex when completed by early 2026. A case manager and community partner sponsor will facilitate a custom program plan created with the participant for up to 36 months. The framework will center around wage development, budgeting, skills training, self-sufficiency, and social capital.

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

### **Actions taken to address the needs of public housing**

The New Braunfels Housing Authority provided subsidized housing for about 400 households, or approximately 1,000 people, through subsidized rental properties owned and managed by the Housing Authority and through the Section 8 Housing Choice Vouchers

The New Braunfels Housing Authority has 170 public housing units in New Braunfels that are owned by the Housing Authority. The Housing Authority also owns a high-rise elderly/disabled complex with 100 units and 35 duplexes for larger families. The Housing Authority provides 292 vouchers through the Housing Choice Voucher program.

During PY24, the Housing Authority developed a new 5-Year Plan. Highlights of the plan include possible conversion and/or redevelopment of the Housing Authority's properties and to continue modernizing housing units through the use of the Capital Fund Program.

The Housing Authority and the City continued to identify ways to provide affordable rental units and increase safety for public housing residents

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

The New Braunfels Housing Authority encouraged residents to become more involved by providing the residents with the opportunity to learn about the activities, security, modernization projects and management issues and provide input and feedback. Two public housing residents are voting members on the Board of Directors and provide information to the Board on current needs and issues and help direct the efforts of the staff to the most immediate issues. City staff will continue to meet with the Executive Director to discuss upcoming changes and plans for public housing residents and properties and to support efforts to coordinate the work of social service organizations that provide services, housing assistance and homeownership opportunities to public housing residents. At the present time, there are no downpayment and closing costs assistance programs to help with homeownership. CDBG funds could be used for these activities if a non-profit or the Housing Authority is interested in such a program.

### **Actions taken to provide assistance to troubled PHAs**

The New Braunfels Housing Authority is not designated as a troubled PHA.

## **CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j)**

**Actions taken to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment. 91.220 (j); 91.320 (i)**

During PY24, the City continued to support the development of affordable housing and reviewed its policies affecting housing development, building codes and zoning ordinances. The City conducted an Analysis of Impediments to Fair Housing Choice in PY23 and did not identify any policies that negatively affected affordable housing development. The City's Workforce Housing Advisory Committee continued to meet to identify priorities, housing needs, obstacles to affordable housing development and work to increase the stock of affordable housing. The City is developing a Housing Trust Fund program that will be managed by the City. The Housing Trust fund will create and administer a Workforce Housing Incentive Fund (WHIF) to provide capital financing to create or preserve long-term affordable housing units throughout the City for low to moderate-income households.

The primary obstacle to developing affordable housing is the limited number of lots and the cost of land which increases the price of the house and makes it unaffordable for low-moderate income households.

The City continued to monitor its policies regarding code enforcement, development costs and housing inspections to ensure equal access for all underserved residents. Another significant obstacle remained the lack of agencies with the capacity to develop and manage affordable housing projects. There are no Community Housing Development Organizations (CHDOs) or Community Development Corporations (CDCs) in the City of New Braunfels. During PY24, the City of New Braunfels operated a minor home repair program and provided weatherization and aging in place to improve the quality of housing for low-moderate income homeowners and to assist elderly homeowners with accessibility improvements allowing them to remain in their homes.

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

During PY24, the City focused on a comprehensive approach in determining underserved needs and population by holding its annual stakeholder meetings, meetings with focus groups, one-on-one conversations with service and housing providers, public hearings, monthly meetings with the Community Development Advisory Committee and participating in the Comal County Homeless Coalition to identify unmet needs and to strategize on how to meet those needs

In 2021, New Braunfels received American Rescue Plan Act (ARPA) funds and due to the flexibility of the funding, the City has been able to utilize the funds for a much larger positive impact on the needs of the low- to moderate-income residents. For example, the City awarded over \$7.1 million dollars in grants to 8 local non-profit agencies for capital improvement projects at their public facilities. Upon completion all projects will provide assistance to low-moderate income City residents such as a youth care center,



affordable housing, emergency shelter and transitional housing, victims of domestic violence and sexual assault, and at-risk youth.

The New Braunfels Economic Development Corporation and New Braunfels Utilities (NBU) have explored various methods to bring greater broadband availability. The New Braunfels City Council has approved a project to help subsidize the expansion and delivery of high-speed broadband infrastructure and services at an affordable rate to underserved and commercial areas of New Braunfels. There are several companies that provide internet service in New Braunfels, such as CenturyLink, ViaSat, and Spectrum. According to information from data.census.gov ("Measuring America's People, Places, and Economy"), 95.2% of New Braunfels residents have a broadband internet subscription. City Management and the City's Economic and Community Development department continues to evaluate broadband needs of its residents for consideration of future projects.

According to information provided by OSCA, FEMA Risk Index, and climate information from HUD, New Braunfels has a Relatively Moderate risk index based on Expected Annual Loss, Social Vulnerability, and Community Resilience. The City's Emergency Management Division of the New Braunfels Fire Department is the entity responsible for public safety during natural disasters such as flooding, winter storms, and other natural disasters. The greatest threats to New Braunfels residents are increased summer heat, river flooding, and longer periods of winter weather. The Emergency Management team has developed coordinated responses and agreements with private and volunteer agencies, maintains an updated lists of resources, and assigns roles for various groups to assist the City during emergency events. In addition, the group provides warning materials and announcements; briefs the radio, television, and newspaper entities on emergency matters; and presents information to civic organizations, schools, churches, and community centers. The Salvation Army provides a cooling center during the summer months, and NB Housing Partners provides a cold weather shelter during the winter.

#### **Actions taken to reduce lead-based paint hazards. 91.220(k); 91.320(j)**

To reduce lead-based paint hazards the City has implemented the following strategies: Lead-based paint hazard identification and reduction strategies include education, outreach, and conformance with 24 CFR Part 35 regulations. The City coordinates with the Comal County Health Department to review addresses of proposed housing projects to determine if the location is a housing unit in which children have been previously identified as having blood lead levels (EBLL). Additionally, the City requires lead-testing from qualified lead inspectors for proposed housing projects for housing built prior to 1978 in which the household includes children aged five or under. Positive test results will be reported by the City to the Comal County Health Department so that the County may then initiate their lead-testing protocol. As applicable, a lead hazard remediation plan must be included with the scope of work that is submitted to the City by the CDBG-funded subrecipient prior to project approval. A notice to proceed will not be issued by City until a qualified lead inspector verifies that the lead hazard has been abated.

### **Actions taken to reduce the number of poverty-level families. 91.220(k); 91.320(j)**

New Braunfels addresses the problem of poverty through the 2020-2024 Consolidated Plan and the City's Strategic Plan. Through a comprehensive approach that combines safe, decent affordable housing for low- to moderate-income families with social services, education, access to health and employment, the City strives to reduce the poverty rate. The City, as leading agency in the implementation of the Consolidated Plan, coordinated with local organizations to ensure that goals are met and will continue to provide assistance to agencies that provide services to poverty-level households.

Actions taken during PY24 were:

- San Antonio Food Bank provided emergency food assistance to 340 New Braunfels residents as well as providing a mobile pantry at the Westside Community, the New Braunfels Housing Authority and various other sites.
- CASA of Central Texas provided advocacy and case management services to 73 abused and/or neglected children.
- The Crisis Center of Comal County provided assistance with transportation, medication, food and clothing to 588 shelter residents.
- River City Advocacy provided individual mental health counseling to 92 low-moderate income New Braunfels residents.
- Family Life Center provided 174 low-moderate income residents of New Braunfels with emergency rent and/or utility assistance to prevent eviction and discontinuation of utility services.
- The City of New Braunfels provided minor home repairs including weatherization and Aging in Place improvements to three low-moderate income homeowners.
- Big Brothers Big Sisters provided mentors to 24 at-risk children/youth.
- The Salvation Army provided transitional housing and case management to 10 adult males as they transition from homelessness into stable housing.
- NB Housing Partners provided emergency shelter and supportive services to approximately 480 unsheltered homeless residents of New Braunfels.

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

The City has developed and maintains a comprehensive and successful institutional structure. Any issues noted during the program year will be reviewed and revisions, if necessary, to this process will be incorporated. During PY24, the City continued to make CDBG funds available to the community through an open application process and issuance of subrecipient agreements. The City provided subrecipient training during the application phase, prior to the execution of Subrecipient Agreements, conducted monthly desk reviews and monitoring and provided technical assistance to subrecipients to ensure that all HUD and City requirements were being met. The City maintained its webpage with up-to-date information as a resource for other City departments, general public and service/housing providers. The City participated in the local homeless coalition meetings and conducted its annual

~~takeholder~~stakeholder meetings to solicit input from service and housing providers on the issues their clients were experiencing to identify gaps in service and to prioritize needs. During PY24, the City maintained communication with the New Braunfels Housing Authority and local agencies providing housing and services to low-moderate income people and households to address any emergency needs through stakeholder meetings and focus groups and one-on-one meetings. The City's Grants Coordinator in the Finance Department worked closely with other City departments and local agencies to assist in the development of a strong institutional structure for effective program delivery.

**Actions taken to enhance coordination between public and private housing and social service agencies. 91.220(k); 91.320(j)**

The City has developed an effective structure for working with non-profit service and housing providers, City departments, and the New Braunfels Housing Authority which includes stakeholder meetings, participation in the Comal County Homeless Coalition, surveys, and technical assistance.

Implementation of the PY24 Annual Action Plan involved a variety of agencies and City departments. Collaboration and coordination between agencies are important to ensure that the needs in the community are addressed efficiently and effectively. The City worked with the Comal County Homeless Coalition and its member agencies by participating in monthly meetings. Agencies provided information on housing and service needs and identified gaps in both categories as well as fair housing issues and the needs of low-moderate areas within the City. The key agencies involved are listed below:

- Community Development Advisory Committee – a nine-member volunteer committee of New Braunfels residents that are appointed by the City Council and serve for three-year terms. CDAC provides guidance and input on CDBG programs and makes funding recommendations to City Council
- McKenna Foundation – Local community foundation that works closely with non-profit agencies
- New Braunfels Housing Authority – Public housing and Housing Choice vouchers
- CASA of Central Texas – advocacy for abused and neglected children
- Comal County Senior Citizens Foundation – Meals on Wheels and meals at the site as well as recreational and educational programs for senior citizens
- Family Life Center – Emergency rent and utility assistance
- Crisis Center of Comal County – Emergency shelter and services for victims of domestic violence and sexual assault
- San Antonio Food Bank – New Braunfels Facility – Emergency food distribution and educational/nutrition programs
- Connections Individual and Family Services – Emergency shelter for homeless and runaway children and youth; transitional housing for youth
- The Salvation Army – Transitional housing, crisis and emergency services, meal programs and supportive services for people experiencing homelessness and low-income residents.
- New Braunfels & Comal County ISDs – Homeless liaisons and services for students who are

experiencing homelessness or at-risk of homelessness

- Hill Country MHDD – Mental health and developmental disabilities services
- River City Advocacy – Mental health services
- NB Housing Partners – Emergency shelter and supportive services for homeless adults
- Big Brothers Big Sisters – Mentoring programs for at-risk children and youth
- National Church Residences Foundation – affordable rental housing for elderly residents of New Braunfels
- New Braunfels Youth Collaborative – educational and social programs for New Braunfels youth

**Identify actions taken to overcome the effects of any impediments identified in the jurisdictions analysis of impediments to fair housing choice. 91.520(a)**

The City of New Braunfels' policies are reasonable, and the development regulation process generally runs smoothly but contractors have reported that receiving the required permits can take an excessively long period of time. As specific minor home repair projects were requested by homeowners, the City reviewed the project for its compliance with existing local laws and regulations including lead-based paint requirements. If a local law or regulation prove to have a negative impact on a proposed affordable housing program or project, such law or regulation would be reviewed to determine its viability.

The City acknowledges that there is a shortage of affordable housing both for homeownership and rental. The shortage of viable land for large-scale apartments and the cost for available parcels results in a market that does not support multi-family and/or affordable units for low-income residents without a form of subsidy. The City does review and approve, when viable, Low Income Housing Tax Credit applications to the State of Texas. However, without HOME funding and a small CDBG allocation, the City does not have the ability to finance affordable housing by developers. The City continues to seek alternate funding opportunities and options for affordable housing.

The City updated the Analysis of Impediments to Fair Housing Choice in PY22. The City has a Fair Housing Ordinance and a Fair Housing Officer who is responsible for providing educational materials and information on fair housing; receiving fair housing complaints; assisting complainants in filing documentation with HUD; reviewing City policies to ensure there is no violation to the Fair Housing Act or related Acts; and maintaining a log of all fair housing activities, inquiries, and complaints with the outcomes. No fair housing complaints were received by the City during PY24.

## **CR-40 - Monitoring 91.220 and 91.230**

**Describe the standards and procedures used to monitor activities carried out in furtherance of the plan and used to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements**

During PY24, CDBG Program Staff were responsible for monitoring Subrecipients to ensure compliance with all regulations and requirements governing their administrative, financial, and programmatic operations. This includes assuring that performance goals are achieved within the scheduled time frame, budget, and when necessary, taking appropriate actions when performance problems arise. Monitoring is not a "one-time event", but rather occurred through review of monthly reports, an annual comprehensive desk review, and ongoing contract supervision and technical assistance.

For the comprehensive remote monitoring, the subrecipients were notified via email by CDBG Program Staff requesting detailed information including, but not limited to, the following:

- Conformance to awarded Subrecipient Agreement
- Client Files
- Progress Reports
- Management and Financial Systems
- Policies and Procedures
- Equipment Inventory, if CDBG funds were used to purchase equipment.
- Non-discrimination, and Actions to Further Fair Housing
- Section 3, and Minority Business
- Compliance with Consolidated Plan

CDBG Program Staff conducted an on-going monitoring process to review the programmatic and financial aspects of the Subrecipient's activities. CDBG Program Staff reviewed monthly reports submitted by the Subrecipients for compliance with federal regulations regarding the use of federal funds and the implementation of the program. The monitoring process was oriented towards resolving problems, offering technical assistance, and promoting timely implementation of programs. As such, CDBG Program Staff required corrective actions of the Subrecipients if any of the following issues were identified: Services are not documented; Goals are not being met; Program files not in order; Complaints by clients; Required reports not being submitted in a timely manner; Incomplete or reports with errors; and/or Expenditure issues.

Subrecipients were required to submit a monthly report detailing the implementation and administration of the activity or program. The monthly programmatic report included the following: Progress in meeting stated goals and objectives; Client Summary that identifies the income, ethnicity, and household status of clients receiving CDBG-funded assistance within the reporting period; Changes in staff using the Section 3 form and/or Board of Directors; Problems encountered, and steps taken to

resolve them; Other general information as appropriate. These reports must be submitted to CDBG Program Staff by the 10th of each month following the month when services were provided unless other arrangements have been made.

Subrecipients must adhere to HUD's recordkeeping requirements as contained in 24 CFR Part 570 Subpart J. HUD-funded records must be retained for four years after the submission of the program year CAPER or five years after the completion of the program, in order to allow access for audit and public examination. If audit findings are not resolved, the records must be retained beyond the five years.

### **Citizen Participation Plan 91.105(d); 91.115(d)**

#### **Describe the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.**

In accordance with HUD regulations and the City's Citizen Participation Plan, the notice of the comment period and the public hearing for the CAPER were published in the local newspaper, and on the City's website in English and Spanish. The public hearing will be held on ~~November 24~~, December 2, 2025, at New Braunfels City Hall at 550 Landa Street, which is an accessible building. Certified interpreters in Spanish and German, sign language and any additional accessibility needs were available upon request. Copies of the draft CAPER were available at City Hall, New Braunfels Public Library – Main Branch, the New Braunfels Public Library – Westside Branch, and on the website. It was noted in the public notice that written and verbal comments received during the public comment period would be summarized and included in the final document for submission to the U.S. Department of Housing and Urban Development.

The City's comment period for the CAPER was from November ~~24~~<sup>17</sup>, 2025, through December ~~10~~<sup>3</sup>, 2025. Citizens were encouraged to provide verbal or written comments to a designated CDBG Program Staff member whose contact information was provided in the Public Notice.

It is the City's policy to accept all comments and views presented. Comments related to the CDBG program are reviewed and responded to by CDBG Program Staff as quickly as possible. Comments received by CDBG staff related to other matters of the City are referred to the appropriate department. **The City did not receive any citizen comments during the comment period or at the public hearing held on December 2, 2025.**

## **CR-45 - CDBG 91.520(c)**

**Specify the nature of, and reasons for, any changes in the jurisdiction's program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.**

There were no changes to the City's program objectives during PY24. CDBG funded activities and programs did not have a reduction or cancellation of their award due to ongoing COVID-19 activities funded by the City. The City does not have an existing Section 108 loan.

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

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

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

## CR-58 – Section 3

Identify the number of individuals assisted and the types of assistance provided

Total Labor Hours	CDBG	HOME	ESG	HOPWA	HTF
Total Number of Activities	0	0	0	0	0
Total Labor Hours	0	0	0	0	0
Total Section 3 Worker Hours	0	0	0	0	0
Total Targeted Section 3 Worker Hours	0	0	0	0	0

**Table 8 – Total Labor Hours**

Qualitative Efforts - Number of Activities by Program	CDBG	HOME	ESG	HOPWA	HTF
Outreach efforts to generate job applicants who are Public Housing Targeted Workers	0	0	0	0	0
Outreach efforts to generate job applicants who are Other Funding Targeted Workers.	0	0	0	0	0
Direct, on-the job training (including apprenticeships).	0	0	0	0	0
Indirect training such as arranging for, contracting for, or paying tuition for, off-site training.	0	0	0	0	0
Technical assistance to help Section 3 workers compete for jobs (e.g., resume assistance, coaching).	0	0	0	0	0
Outreach efforts to identify and secure bids from Section 3 business concerns.	0	0	0	0	0
Technical assistance to help Section 3 business concerns understand and bid on contracts.	0	0	0	0	0
Division of contracts into smaller jobs to facilitate participation by Section 3 business concerns.	0	0	0	0	0
Provided or connected residents with assistance in seeking employment including: drafting resumes, preparing for interviews, finding job opportunities, connecting residents to job placement services.	0	0	0	0	0
Held one or more job fairs.	0	0	0	0	0
Provided or connected residents with supportive services that can provide direct services or referrals.	0	0	0	0	0
Provided or connected residents with supportive services that provide one or more of the following: work readiness health screenings, interview clothing, uniforms, test fees, transportation.	0	0	0	0	0
Assisted residents with finding child care.	0	0	0	0	0
Assisted residents to apply for, or attend community college or a four year educational institution.	0	0	0	0	0
Assisted residents to apply for, or attend vocational/technical training.	0	0	0	0	0
Assisted residents to obtain financial literacy training and/or coaching.	0	0	0	0	0
Bonding assistance, guaranties, or other efforts to support viable bids from Section 3 business concerns.	0	0	0	0	0
Provided or connected residents with training on computer use or online technologies.	0	0	0	0	0
Promoting the use of a business registry designed to create opportunities for disadvantaged and small businesses.	0	0	0	0	0
Outreach, engagement, or referrals with the state one-stop system, as designed in Section 121(e)(2) of the Workforce Innovation and Opportunity Act.	0	0	0	0	0
Other.	0	0	0	0	0

**Table 9 – Qualitative Efforts - Number of Activities by Program**

### Narrative

During PY24, the City of New Braunfels did not have any Section 3 projects or activities.