



Texas General Land Office (GLO) Community Development and Revitalization (CDR)

Guidance Document:
*Regional Needs Assessment and Affirmative Fair Housing Marketing and Outreach Plan -
Requirements and Schedule*

Document Date: September 11, 2018

Purpose of Document: To provide guidance to Homeowner Assistance Program (HAP) vendors on requirements and schedule for the development of the regional needs assessments and related affirmative fair housing marketing and outreach plan for their assigned areas affected by Hurricane Harvey. The regional needs assessment informs:

1. Allocation of program funds to HUD identified income brackets, specifically Low to Moderate (LMI) Income brackets, vulnerable populations and geographic areas;
2. Development of targeted program activities to reach all survivors in proportion to need;
3. Identification of targeted areas for marketing and outreach; and
4. Establishment of criteria for identifying and selecting housing projects that meet program objectives.

This guidance document complements the GLO-CDR Housing Guidelines document located here:
<http://recovery.texas.gov/hud-requirements-reports/housing-guidelines/index.html>.

Objectives:

1. Develop effective affirmative fair housing marketing and outreach plans that ensure all affected populations, including racial and ethnic minorities and other vulnerable or hard-to-reach populations (e.g., lower-income households, the disabled, elderly, and others with special needs), are aware of and provided adequate assistance through the HAP program.
2. Leverage diverse vendor expertise to develop a robust and consistent methodological approach for assessing local/regional needs and utilize assessment findings to set funding goals, determine program activities, conduct targeted outreach and marketing, and establish project selection criteria.
3. Promote collaboration among GLO-CDR staff, vendors, and community partners (e.g., Councils of Governments [COGs], local elected officials, social service providers and U.S. Housing and Urban Development [HUD]-approved housing counseling agencies) to ensure quality analysis, thoughtful consideration of local area needs, and well-informed targeted outreach and marketing plans.

Regional Needs Assessment Requirements:

1. Submit proposed methodology and citizen participation plan to the GLO-CDR prior to conducting assessment, include COG coordination and strategy.
2. Data analysis on affected populations should be conducted at the U.S. Census Bureau's (Census) block ID level with outreach and marketing efforts differentiated at this level as needed (i.e., demographics at the block group level).
3. Work with the COGs, local elected officials, social service providers, HUD-approved housing counseling agencies, and other community partners to obtain input on the assessment. Engagement with the COGs and local elected officials must be coordinated with GLO-CDR staff. Engagement with the COGs should be held prior to submitting the draft regional needs assessment due 25 days from work order execution (WOE).
4. The assessment should evaluate the demographic and socioeconomic characteristics of different locations within the region (city/town, County, zip code, and Census block group).
5. The assessment should be used to set funding goals by low- to moderate- (LMI) income bracket (0-30% Area Median Income [AMI], 31-50% AMI, and 51-80% AMI), inform program activities, and set strategies to achieve fair housing objectives. Deviations from goals must be approved by the GLO. See attached "Needs Assessment Tool Checklist" and the "GLO-CDR Housing Guidelines" linked above for additional requirements.

Affirmative Fair Housing Marketing and Outreach Plan Requirements:

1. Submit proposed marketing and outreach outline and high-level summary (no more than 5 pages) to the GLO-CDR prior to developing the affirmative fair housing marketing and outreach plan.
2. The plan should be based on the regional needs assessment and explicitly refer to the findings of the assessment to support the specific outreach and marketing strategies by identified geographic area.
 - *Outreach* refers to targeted engagement to potential applicants, including the racial and ethnic minorities, and disabled persons who are less likely to be reached by traditional marketing. Such outreach may take place within a unique community (i.e., city/town, County, zip code, or Census block or block group) through more direct means such as targeted mailings (including letters and bill inserts), multilingual brochures/handouts for persons with Limited English Proficiency, phone, door-to-door canvassing, community meetings, and collaboration with local partners (e.g., COGs, elected officials, social service providers, HUD-approved housing counseling agencies, non-profit organizations, and other local government officials and organizations). Engagement with the COGs and local elected officials must be coordinated with GLO-CDR staff. Proposed outreach measures should include *hard-to-reach* populations including language minorities and vulnerable populations.
 - *Marketing* refers to traditional written and oral communication mediums that promote awareness and understanding of the program to a broad audience such as television, radio, billboards, newspapers and other publications (paper and online), and social media.
 - Targeted outreach and marketing should vary by location within each region based on the characteristics of the unique community to maximize awareness of the program (e.g., concentrations of affected individuals still living in affected home may be best reached through door-to-door canvassing while former residents of abandoned homes may need to be contacted via phone). Effective outreach is critical to affirmatively furthering fair housing (AFFH).¹
3. The plan should leverage the regional needs assessment and describe strategies to reach lower-income and other vulnerable or hard-to-reach populations (e.g., those with special needs such as disabilities), including racially and ethnically concentrated areas of poverty, affected by Hurricane Harvey.
4. The plan should promote awareness and utilization of public services, and include information on how the vendor will coordinate with social service providers and HUD-approved housing counseling agencies (see <https://apps.hud.gov/offices/hsg/sfh/hcc/hcs.cfm?weblistaction=summary> for database of HUD-approved agencies).
5. The plan should include monthly outreach targets.
6. The plan should include protocols for engaging in communications with the COGs and elected officials.
7. The plan should include protocols for standardizing outreach documents (e.g., marketing materials, packets, forms, meeting agendas and sign-in sheets, etc.) and receiving approval of forms and outreach content by GLO-CDR staff.
8. The plan should address measures to be taken to meet accessibility, language, and other fair housing and civil rights requirements.
9. The plan should address measures to be taken to meet record retention requirements for outreach and marketing materials, including all advertisements and announcements, and protocols for making these documents available to the public upon request.
10. The plan should address the process for monthly reporting on outreach and marketing including an evaluation of the effectiveness of outreach activities to meet funding goals and identification of corrective actions to improve effectiveness if necessary.
11. See attached “Affirmative Fair Housing Marketing and Outreach Checklist” and the “GLO-CDR Housing Guidelines” linked above for additional requirements.

¹ See Federal Register Vol. 80, No. 136 (July 16, 2015) for information of HUD’s AFFH rule. Located: <https://www.gpo.gov/fdsys/pkg/FR-2015-07-16/pdf/2015-17032.pdf>.

Table 1: Regional Needs Assessment – Data Sources

Data Source	Link
Federal Emergency Management Agency (FEMA) Individual Assistance (IA) registrants by Census block (<i>GLO-CDR has these datasets broken down by County and COG</i>)	https://www.fema.gov/openfema-dataset-individual-assistance-housing-registrants-large-disasters-v1
FEMA IA data by ZIP code	https://www.fema.gov/media-library/assets/documents/132213
FEMA Flood Hazard Zones	https://www.fema.gov/flood-zones https://msc.fema.gov/portal/home
FEMA National Flood Hazard Layer (NFHL) Viewer	https://hazards-fema.maps.arcgis.com/apps/webappviewer/index.html?id=8b0adb51996444d4879338b5529aa9cd
FEMA Flood Information Portal (Region 6 Counties)	http://maps.riskmap6.com/
HAP allocation spreadsheet	To be provided by GLO-CDR staff
Low- to Moderate-Income Summary Data (LMISD) by Census block group	https://www.hudexchange.info/programs/acs-low-mod-summary-data/acs-low-mod-summary-data-block-groups-places/
LMISD by local governments	https://www.hudexchange.info/programs/acs-low-mod-summary-data/acs-low-mod-summary-data-local-government/
GLO Geographic Information System (GIS) Community Development Block Grant (CDBG) Viewer and Report Tool	http://gis.glo.state.tx.us/cdbg/index.html
American Community Survey (ACS) Census data, including special needs and other demographics related to vulnerable and hard-to-reach populations	https://factfinder.census.gov/faces/nav/jsf/pages/index.xhtml (includes Advanced Search option and mapping tool)
Census TIGER Products providing GIS shapefiles, geodatabases, and demographic and economic data	https://www.census.gov/geo/maps-data/data/tiger.html
Small Business Administration (SBA) Home and Business Data	To be provided by GLO-CDR staff
Longitudinal Employer-Household Dynamics (LEHD) data that characterizes workforce dynamics for specific groups	https://lehd.ces.census.gov/
Insurance Data	To be discussed
Individual Income Limits HUD Query Tool	https://www.huduser.gov/portal/datasets/il.html#2018_query
Survey data (e.g., on-site visits to areas identified by community partners)	N/A
Housing Needs Survey	To be provided by GLO-CDR staff once available (October 2018)

Table 2: Regional Needs Assessment and Affirmative Fair Housing Marketing and Outreach Plan – Schedule

#	Event	Owner	Due Date
1	Vendor kick-off to review requirements and schedule	GLO-CDR	9/13/2018
2	Webinar/GLO Office Presentation: Data Tutorial & Overview (9:00am-11:00am)	GLO-CDR and Vendors	9/14/2018
3	Identify team leads/contacts and submit to GLO-CDR contacts listed below	Vendors	9/17/2018
4	Create vendor contact list for circulating proposed methodologies/plans and send invite for 9/27/18 workshop (planned for afternoon)	GLO-CDR	9/18/2018
5	Circulate proposed regional needs assessment methodology and affirmative fair housing marketing and outreach plan outline and summary to contact list. Include outreach and coordination strategy with regional COGs.	Vendors	9/20/2018
6	Workshop on proposed methodologies/plans to review and decide on uniform approach	GLO-CDR and Vendors	9/27/2018
7	Issue guidance document on uniform methodological approach	GLO-CDR	10/1/2018
8	Submit draft regional needs assessment to GLO-CDR contacts listed below	Vendors	25 days from WOE*
9	Review assessment and provide approval or identify items to address (if items are to be addressed, plan must be resubmitted within 5 days)	GLO-CDR	30 days from WOE*
10	Conduct citizen participation for regional needs assessment, including gathering feedback from COGs, local elected officials, social service providers, HUD-approved housing counseling agencies, and other community partners, and post for public comment in coordination with GLO-CDR. This input should also inform development of the affirmative fair housing marketing and outreach plan.	Vendors and GLO-CDR	30-60 days from WOE*
11	Submit updated regional needs assessment to GLO-CDR for approval.	Vendors	60 days from WOE*
12	Review updated assessment and provide approval or identify items to address (if items are to be addressed, plan must be resubmitted within 5 days)	GLO-CDR	65 days from WOE*
13	Submit affirmative fair housing marketing and outreach plan to GLO-CDR contacts listed below	Vendors	65 days from WOE*
14	Review plan and provide approval or identify items to address (if items are to be addressed, plan must be resubmitted within 3 days)	Vendors	70 days from WOE*
15	Begin conducting community outreach	Vendors	76+ days from WOE*

*Work order execution signatory date

GLO-CDR Contacts:

Table 3: Regional Needs Assessment and Affirmative Fair Housing Marketing and Outreach Plan – GLO Contacts

Name and Title	Email	Phone
Jonathan Campbell , Manager, Single Family Housing	jonathan.campbell.glo@recovery.texas.gov	512-475-5110
Bridget Sharphorn , Fair Housing Oversight	bridget.sharphorn.glo@recovery.texas.gov	512-475-5096
Christine “Chrissy” Taylor , Single Family Housing	christine.taylor.glo@recovery.texas.gov	512-475-5043
Alex Gamble , Manager, Policy Development	alexandra.gamble.glo@recovery.texas.gov	512-475-5021
Shawn Strange , Project Manager, Policy Development	shawn.strange.glo@recovery.texas.gov	512-475-5031
Chris Smith , Planner, Policy Development	christopher.smith.glo@recovery.texas.gov	512-475-5111



Texas General Land Office
Community Development and Revitalization
Needs Assessment Tool Checklist

Subrecipient:	
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Received Date:	
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The Needs Assessment is a critical component in the allocation of funding across and within national objectives for CDBG-DR funds. A needs assessment will recommend the proportions of funding that should be set aside to benefit each LMI and non-LMI economic group. The needs assessment will determine the activities to be offered, the demographics to receive concentrated attention, the disabled, "special needs", vulnerable populations, and target areas to be served. This checklist serves as a tool to equitably allocate funds across jurisdictions and neighborhoods to serve survivors in proportion to need.

The Needs Assessment should include the following key elements:

Element	Discussed /Captured	Comment
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Introduction

<i>Description of the communities needs according to the population that suffered damage as a result of the disaster event.</i>		
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Baseline Data

The baseline data captured below allows for the Subrecipient or Vendor to initiate an analysis of impacted survivors whom registered with FEMA for individual assistance (IA). The FEMA data captures several attributes including a registrant number, special needs, reported damages, destroyed, occupants 65 years or older, Access and Functional needs, etc. and income at the time of the event.

An analysis of the overall damages (at a minimum FEMA IA data (GLO may provide redacted FEMA data, when available)		
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An analysis of the overall damages by registrants reported income		
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An analysis of Registrants with special needs, number of occupants, elderly populations, access and functional needs as captured in the FEMA data.		
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HUD Income Limits by County- (income limits at time of event) used to determine income ranges.		
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The needs assessment will also include an assessment of the types of public services activities that may be needed to complement the program, such as housing counseling, legal counseling, job training, mental health, and general health services.		
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HUD FY 2018 LMISD by State - All Block Groups (A Census Block Group is a geographical unit used by the United States Census Bureau which is between the Census Tract and the Census Block), Based on 2006-2010 American Community Survey (when FEMA IA data is not available use LMISD to determine the LMI levels only)		
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Element	Discussed /Captured	Comment
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FY 2018 LMISD Local Governments by State, Based on 2006-2010 American Community Survey by Place (when FEMA IA data is not available use LMISD to determine the LMI levels only)		
County or Council of Government Award (as provided in the Action Plan or approved Method of Distribution (MOD))		
Other damage data acceptable by the GLO such as survey data that may include on-site visits to areas identified by public groups or elected officials) broken out by income category.		
Create a Needs Methodology Using Available Data		
An analysis of income categories (damage data sorted by applicants reported income against HUD Income limits) of households in the community affected by the disaster. This is done by calculating the percent of damage suffered proportionally across all 4 income categories (very-low, low, moderate, and non-LMI) broken out by: -0%-30% Area Median Family Income (AMFI), very low income -31%-50% AMFI, low income -51%-80% AMFI, moderate income non-LMI		
Establish <i>Floor</i> Goal Percentages by calculating damage suffered proportionally across only the 4 Income categories. Ensure that at a minimum 70% of the funds are reflected in the LMI percentages.		
Establish <i>Ceiling</i> Goal Percentages by calculating damage suffered proportionally across only the 3 LMI categories.		
Calculate the COG/Subrecipient housing funding allocation floor for each income category and the other category by multiplying the FEMA calculation data by the total dollar amount.		
Capture FEMA Calculation Data by Income Categories in a table. Include a qualifier for applicants with special needs, elderly, access and functional needs, etc.		
Additional data captured, the Subrecipient may consider other local data sets specific to the region to be included in establishing final minimum fund limits accross the proportion that suffered damage. The data must be supported and further analysis may be required.		
Grant Manager:		
Date:		
Signature		



Texas General Land Office
Community Development and Revitalization
Affirmative Fair Housing Marketing and Outreach
Checklist

Subrecipient:	
Received Date:	

The following must be captured in the Subrecipient's outreach plan:

Requirement	Verified	Grant Manager Comment
A description of the targeted area, qualifications for targeting, and the estimated number of people identified as LMI (to include AMI categories) or UN.	<input type="checkbox"/>	
Outreach program coordinator identified for the program.	<input type="checkbox"/>	
Designee or team identified who will conduct targeted outreach in the field.	<input type="checkbox"/>	
The specific plans for targeted outreach (mailings, community outreach, door-to-door, etc.).	<input type="checkbox"/>	
Plan for contacting former residents of abandoned homes damaged by the event.	<input type="checkbox"/>	
Process for reviewing applications to determine how they compare with the AMI income levels and targeted areas, and events that effected their homes.	<input type="checkbox"/>	
Identification of factors that will be used to prioritizing applicants for award.	<input type="checkbox"/>	
Description or submission to the GLO of any marketing items used in conjunction with the GLO-supplied marketing templates.	<input type="checkbox"/>	
Was there a local public process and/or posting on the Subrecipient's website (optional)? Provide the dates.	<input type="checkbox"/>	

Comments:

Grant Manager:	
Date:	
Signature:	