



JACQUES L. BLANCHETTE
County Judge

November 3, 2011

Katy Sellers
Post Office Box 12873
Austin, Texas 78711-2873
Katy.sellers@glo.texas.gov

RE: FFAST Form Information Request Response for Tyler County Submission

Dear Ms. Sellers:

Thank you for the opportunity to address the issues that have been identified with the Tyler County FFAST Form Submission. The County has modified its FFAST Form in response to the issues identified.

The FFAST Form has been amended as follows (bold blue areas identify changes):

Impediment # 5

3. It would be beneficial for local elected officials to require senior staff of any subrecipient such as a city or county—including managers and attorneys—to receive available Fair Housing training within the first 12 months of their employment or engagement.

- We have a policy in place providing for all senior staff – including managers and attorneys – to receive Fair Housing training within their first 12 months on the job, and for long-term senior staff to receive regular updated training. [Attach policy]
- We do not have such a policy and will develop and implement one.

When will you do this? 2011 2012 2013

- Not Applicable (Since it will place excessive financial burden upon the county to require all senior staff – chief deputies and attorneys – to receive Fair Housing training within their first twelve months on the job and for long-term senior staff to receive regular updated training, the county will maintain a designated Office/Staff Position for the purpose of AFFH oversight. This position will be required to receive training and updated training. **The time frame in which the trained person should begin monitoring the County officials activities and informing same of Fair Housing concerns is identified as 2012.**) [Attachment 2 - County of Tyler AFFH Policy, Section III]

Impediment # 6

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.

- 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

- Not Applicable (The county recognizes the value of a testing program but establishing one would create an excessive financial burden. A regional program through the COGs could be a viable alternative. **The County should actively reach out to State and regional agencies to create a testing program and the timeframe for implementation is 2013.**)

It is our belief this additional information provided regarding the County's FFAST Form responses fulfills the requirements necessary for the document to be finally reviewed; however, should further information be needed it will be provided in as timely a manner as possible.

We will be expecting notification of the FFAST Form approval and once approval has been received, we are prepared to move forward with the next requirement activity.

Respectfully,



Jacques L. Blanchette
County Judge

JLB/amp



JACQUES L. BLANCHETTE

County Judge

Confirmation of Receipt

Upon receipt, **please sign** below.

Return signed "Confirmation of Receipt" to County Judge by:

FAX: 409-331-0028 **or** MAIL: 100 W Bluff, Room 102, Woodville, Texas 75979

or EMAIL: judge@co.tyler.tx.us

Document(s): Response to FFAST Form Information

Date Received: November 2, 2011

Sent to: Katy Sellers
P. O. Box 12873
Austin, Texas 78711-2873
Katy.sellers@glo.texas.gov

Sent by:

Audrey Pelly
Print Name

Audrey Pelly
Signature

Date Sent: November 3, 2011

Sent via: scan & email
 mail
 other:

Received by:

Print Name

Signature

Date received: _____