

2023

**NEBRASKA
AFFORDABLE HOUSING
TRUST FUND**

**QUALIFIED
ALLOCATION
PLAN**

NEBRASKA DEPARTMENT OF
ECONOMIC DEVELOPMENT
EFFECTIVE JULY 1, 2023 - JUNE 30, 2024
(2023 PROGRAM YEAR)

NEBRASKA

Good Life. Great Opportunity.

DEPT. OF ECONOMIC DEVELOPMENT

NAHTF 2023 QAP



Table of Contents

Introduction	3
Nebraska Commission on Housing and Homelessness (NCHH)	3
Public Comment Process	3
Housing Priorities	3
Allocation of Funds	4
Funding Cycles and Limitations	5
Application Process Summary	6
2023 NAHTF Timeline	7
Eligible Applicants	8
Eligible Activities	8
Matching Requirements	9
Leverage	9
Selection Criteria and Process	9
Milestones Table	11
Amendments	11
Housing Contact Information	11
Attachment 1 – Nebraska U.S. House of Representatives Congressional Districts	12
Attachment 2 – NDED Housing Program Representative Map	13
Attachment 3 – Public Comments	14

Introduction

The Nebraska Affordable Housing Trust Fund (NAHTF) was established by the Nebraska Affordable Housing Act (Neb. Rev. Stat. §§58-701 through 58-711) in 1996. The Act, which was adopted to address the state's affordable housing needs, called for a portion of the documentary stamp tax from Nebraska real estate transactions to be transferred to the NAHTF. These funds are distributed to support the provision of decent, affordable housing statewide, to encourage economic development and promote the general prosperity of all Nebraskans.

As stipulated by the Act, the Nebraska Department of Economic Development (DED) is required to develop an annual Qualified Allocation Plan (QAP) concerning the distribution of NAHTF resources throughout the state. DED has developed the 2023 QAP with input gathered through five (5) Focus Group meetings in October 2022 with customers of the DED, public comment from the 30-day public comment period, along with feedback gathered from the Strategic Housing Council led by the Nebraska Investment Finance Authority (NIFA) from April 2022 – December 2022. The Strategic Housing Council, with support from the Nebraska Department of Economic Development and a coalition of representatives from government at all levels, local agencies, nonprofits, businesses, and developers from across the state created a bold, new plan to create fundamental changes in statewide housing efforts: *The Nebraska Strategic Housing Framework*. The Framework aims to spur economic development and improve Nebraskan's quality of life by increasing quality, affordable housing options.

Nebraska Commission on Housing and Homelessness (NCHH)

Recognizing the strong link between housing, homelessness, and near homeless issues, the Nebraska Commission on Housing and Homelessness (NCHH) was established by Executive Order 98-4 in 1998. It consolidated the work of the Nebraska Affordable Housing Commission, the Nebraska Interagency Council on the Homeless, and the Affordable Housing Trust Advisory Committee.

The Commission makes recommendations to DED and the Nebraska Department of Health and Human Services (DHHS) regarding the operation of the NAHTF and the Homeless Shelter Assistance Trust Fund (HSATF), respectively; to serve as an advisory body on housing and homelessness; to assist with education, advocacy, coordination, and cooperation; and integrate recommendations from Nebraska's 2020-2024 Consolidated Plan and Annual Action Plan for the Community Development Block Grant (CDBG), HOME Investment Partnerships Fund (HOME), National Housing Trust Fund (HTF), Emergency Solutions Grants (ESG), and Housing Opportunities for Persons with AIDS (HOPWA) with other statewide strategic planning initiatives that involve affordable housing, homelessness, and other housing issues.

DED provides an update of the NAHTF program and receives input at each quarterly NCHH meeting. Changes and recommendations for the 2023 program year were specifically discussed at the November 16, 2022 NCHH quarterly meeting.

Public Comment Process

The QAP for 2023 was submitted for a 30-day public comment period beginning on November 30, 2022. The public comment period concluded on January 4, 2023. All written comments submitted to DED during the public comment period were taken into consideration while completing the final 2023 NAHTF QAP. All written comments were submitted to the Department on or before January 4, 2023, at DED.NebraskaAffordableHousingTrustFund@nebraska.gov. All public comments received by the Department are included as Attachment 3 to this document.

Housing Priorities

The impetus for the Nebraska Affordable Housing Act was the realization that impediments existed to the construction and rehabilitation of affordable housing throughout the State. Increasing development and construction costs and affordable housing financing challenges were impacting the ability of communities to address their housing needs. Existing dilapidated housing stock and industrial buildings were determined to be detrimental to new affordable housing development and the general health and safety of people living and working in or around such places.

Nebraska’s significant need for housing, across the state and across the spectrum of incomes and housing types, continues to be a major concern among area businesses, community leaders, developers, nonprofit organizations, and members of the public. It is well known that safe, adequate, available, and affordable housing is crucial to the viability of communities and businesses, influencing their ability to recruit workers, grow the population, retain residents and pursue economic development opportunities.

The Nebraska Strategic Housing Framework states its vision is: *All Nebraskans have safe, affordable, quality housing choices to rent or own. As a result, affordable housing is the driver of community well-being and economic opportunity.* The Framework has identified shared priorities/objectives and encourages housing programs statewide to act. These shared priorities are 1) By 2028, reduce the number of households that are housing cost burdened by 44,000, and 2) By 2028, develop and rehabilitate 35,000 affordable and attainable low-to-middle-income rental and ownership housing units.

Eighty-four of Nebraska’s ninety-three counties received disaster impacts as a result of flooding due to Winter Storm Ulmer in 2019. Disaster Recovery efforts have been a priority for the state in NAHTF application funding cycles as a response to that disaster. The NAHTF application has prioritized projects specifically designed to benefit those impacted by the 2019 flood. In addition, the State provides assistance to Nebraska communities recovering from the Winter Storm Ulmer (DR-4420) to mitigate damages from flooding and other weather-related incidents in 2019 through the CDBG-DR program.

Housing needs resulting from the Global Pandemic of 2019 are also being addressed with funding distributed under the State of Nebraska’s new Economic Recovery Fund established under LB1014. These funding programs are the Pandemic Relief Housing Program, Qualified Census Tract (QCT) Affordable Housing Program (AHP), and the Rural Workforce Housing Land Development Program.

The Nebraska Affordable Housing Trust Fund is a resource with a major role in achieving the shared objectives of the Nebraska Strategic Housing Framework by encouraging housing programs that meet the housing needs identified by local communities, regions, and housing organizations. Priorities for the 2023 NAHTF program include:

- New affordable housing units for homebuyers,
- New affordable rental housing units,
- Preservation and rehabilitation of housing units, and
- Increasing homeownership opportunities.

Nebraska’s 2020-2024 Consolidated Plan for Housing and Urban Development (HUD) federal programs was finalized in June 2020. Housing continues to be a priority need for federal programs overseen by DED. NAHTF goals and priorities are integrated into the 2020-2024 Consolidated Plan to support the State’s overall commitment to housing.

Allocation of Funds

DED’s spending authority for the 2023 NAHTF program year is anticipated to be \$12,750,000 for NAHTF activities, also known as government aid. State Administration costs are estimated to be \$1,250,000 and this amount is not reflected in the aid appropriation. The Department’s actual spending authority for government aid and state administration costs are subject to legislative appropriation authority.

Per state law, contracts with recipients under the Nebraska Affordable Housing Trust Fund cannot exceed the spending authority approved during the 2023 Nebraska Legislative Session. Previously funded projects are experiencing construction delays due to pandemic-related supply chain and workforce impacts. These delays impact the Department’s spending authority.

Per the requirements of the Nebraska Affordable Housing Act, DED shall put forth its best effort to allocate no less than 30% of NAHTF monies each to Nebraska’s three (3) U.S. Congressional Districts (<https://www.census.gov/mycd/> or refer to Attachment 1).

The following table outlines the anticipated distribution of NAHTF funds for the 2023 program year, dependent upon receipts and available authorized spending authority as set by the 2023 Nebraska Legislative Session:

Estimated NAHTF Government Aid Allocation		NAHTF Activities
\$11,475,000	Housing Funding Cycle(s) – 90% of Appropriation Subject to Congressional District Distribution	
	\$11,325,000	Housing Projects
	\$150,000	Nonprofit Technical Assistance
\$ 1,275,000	Discretionary Funds - 10% of Appropriation	
\$12,750,000	Projected NAHTF Total Aid Appropriation	

DED anticipates awarding 90% of available spending authority through the Housing Funding Cycle(s). DED will award applications based on threshold requirements, demonstration of project readiness and ranking within their congressional district, pending the amount of funding available for that district per cycle.

The remaining 10%, are discretionary funds, have no restriction with regard to congressional district distribution and can be used at the discretion of the Department. The Department intends to make available up to \$750,000 in discretionary funds in conjunction with the 2024 joint application with the Nebraska Investment Finance Authority 9% Low-Income Housing Tax Credit program, with a maximum project award of \$750,000. These awards will only be invested in projects where federal procedural restrictions are a barrier to providing DED federal funding to an otherwise financially feasible, quality project, determined at the sole discretion of the Department and subject to available spending authority.

If NAHTF receives a proposed distribution higher or lower than estimated in table above, the funding will be distributed using the same funding proportions outlined above and subject to available spending authority.

Funding Cycles and Limitations

NAHTF funding will be utilized in the annual competitive housing application cycle (i.e., funding cycle) that will include:

- Housing Development Projects
- Nonprofit Technical Assistance, one in each Congressional District

The 2023 NAHTF award for a housing development project will provide a maximum of \$750,000 for non-administrative project costs. In addition, administrative costs of General Administration, Housing Management, and Lead-Based Paint Testing may be requested according to the maximums listed below.

General Administration: Applicants will be eligible to request up to \$20,000 for General Administration and should be a reasonable request when considering amount and type of award being requested. Typical General Administration costs may involve but are not limited to such items as staff time to create and submit Special Conditions documentation, marketing the program, submission of payment requests, and general accounting duties associated with administering a state award.

Housing Management: Applicants will be eligible to request up to \$5,000 in Housing Management per NAHTF-assisted unit, not to exceed \$75,000 on projects with a primary activity of new construction, purchase/rehabilitation/resale, owner-occupied rehabilitation, homebuyer assistance with rehabilitation, rental rehabilitation, and rental conversion. Applicants with the only primary activity being Homebuyer Assistance will be eligible to request up to \$2,500 per unit in Housing Management, not to exceed \$75,000. If a project will be

providing homebuyer assistance with minor rehabilitation, the rehabilitation must be documented in order to receive \$5,000 per unit. Otherwise, unit completion will be reimbursed at \$2,500 per unit.

Lead-Based Paint: Applicants may request up to \$1,500 per unit to be used on Lead Based Paint testing and assessments. Unused amounts in this category shall be recaptured by DED and are not eligible for budget category amendments.

When a DED Recipient is also the Developer of a project, the NAHTF-funded developer fee allowance should be reasonable and determined by taking into account how much the Recipient will be requesting in Housing Management allowance so as not to receive undue enrichment as a result of this dual role. The Developer Fee for NAHTF projects where the Recipient is also the Developer will be a Deferred Developer Fee and eligible for reimbursement only after completion of the Primary Activity. Projects that have a private developer may show the private developer fee as part of the overall development cost budget and will not include the Developer Fee as a separate budget line item. Instead, the Developer Fee charged to the project by a private developer will be considered an eligible cost under the New Construction or Rehabilitation NAHTF budget line items.

The maximum Nonprofit Technical Assistance award is \$50,000 over a two-year period. General Administration, Housing Management and Lead Based Paint Testing are not an eligible expense for Nonprofit Technical Assistance applications.

DED reserves the right to fund or not fund applications, to exceed the maximums, to adjust requested award amounts within budget line items and to adjust allocations among the categories in the table above, all to allow for flexibility to ensure congressional district distribution requirements, reasonable cost allowance, organizational capacity, meeting urgent housing needs, or other geographic considerations. Any NAHTF funds remaining from the annual funding cycle or any additional funding cycle may be used, at DED's discretion, to increase any of the above-mentioned activities, to create an additional funding cycle, such as a demonstration program, or to be carried forward to the next cycle, whenever and whichever is determined necessary. If Application Guidelines are updated during the application cycle, a notice will go out to the NAHTF mailing list to alert potential applicants of the latest new version.

Application Process Summary

The 2023 NAHTF application cycle will open on February 9, 2023. Preliminary applications (pre-applications) are required prior to acceptance of a full application. This requirement provides DED the ability to offer technical assistance to applicants and to adequately plan for application processing and scoring. A pre-application workshop and open office hours will be offered.

Any pre-recorded or in-person workshops, including the pre-application workshop, are recommended to all applicants, whether they are new or returning to the NAHTF Housing Funding Cycle. The pre-application workshop will include an overview of the program; a review of the application process; application-related frequently asked questions; scoring criteria review; and application writing guidance. Technical assistance is also available from DED housing program representatives upon request (see Attachment 2). The **2023 NAHTF pre-applications will be submitted electronically via AmpliFund**, an electronic management software system. Pre-applications must be submitted to DED electronically on or before the specified due date which will be announced and provided in the Funding Timeline (Application Guidelines, Pg 4). That due date is **March 9, 2023, by 5:00 pm (Central Time)**. **No hard copy pre-applications will be accepted.**

Application Guidelines will be posted on the DED website on or before the opening of the funding cycle. The Application Guidelines include detailed program information, application instructions, and will serve to answer common application-related questions. Instructions for the use of the electronic database, AmpliFund, will also be available. Pre-recorded application workshops focusing on the full application, along with open office hours will be offered, and participation is strongly recommended. The full application workshop will not duplicate program overview and scoring criteria information shared in the pre-application workshop. It is strongly recommended both

workshops be viewed by applicants whether new or returning. The full application workshop will focus on a review of the application process, and will discuss the full application and application guidelines, as well as application and program-related questions.

Open Office Hours will be provided for applicants who have completed a pre-application. These Open Office Hours will provide a forum for applicants to ask questions related to the NAHTF application via WebEx and will provide an opportunity for prospective applicants, application preparers, developers, and housing organizations to collaborate with DED’s housing team members.

Prospective applicants are encouraged to work closely with their housing program representative (Attachment 2) while planning and preparing an application. The **2023 NAHTF applications will be submitted electronically via AmpliFund**, an electronic management software system. Applications must be submitted to DED electronically on or before the specified due date of **May 11, 2023, by 5:00 pm (Central Time)**. **No hard copy applications will be accepted.**

DED processes all applications, conducts a threshold review and a competitive scoring process. Clarifying information may be requested of applicants. When providing clarifying information applications may not be changed and/or altered. Upon completion of scoring, award decisions are made. All applicants will receive letters of selection or non-selection, or other communication.

2023 NAHTF Timeline

2023 NAHTF TIMELINE	
<u>Important Dates</u>	<u>Action</u>
Wednesday, November 16, 2022	NCHH Quarterly Meeting-Review Proposed 2023 NAHTF QAP
Wednesday, November 30, 2022	Proposed QAP Posted & Public Comment Period Begins
Wednesday, January 4, 2023	QAP Public Comment Period Ends
Thursday, February 9, 2023	Final QAP Posted
Thursday, February 9, 2023	2023 NAHTF Application Guidelines Posted and 2023 NAHTF Funding Cycle Opens
Friday, February 17, 2023	2023 NAHTF Pre-Application Workshop (This will be a pre-recorded workshop)
Thursday, February 23, 2023	Open Office Hours for Pre-Application via WebEx <i>10:00am (CT)</i>
Thursday, March 9, 2023	2023 NAHTF Pre-Applications Due by 5:00pm (CT)
Friday, March 10, 2023	2023 NAHTF Application Workshop (This will be a pre-recorded workshop)
March 23 – April 27 Thursdays @ 10:00am (CT)	Open Office Hours for Application via WebEx; <i>To be held Thursdays from 10:00am to 11:00am (CT)</i>
Thursday, March 23, 2023	Site Review Forms Due for New Construction, Rental Rehabilitation and Rental Conversion Projects (Where Sites Have Been Identified)
Thursday, April 6, 2023	Rental Application Budgets and Proformas Due
Thursday, May 11, 2023	2023 NAHTF Applications Due by 5:00pm (CT)

Eligible Applicants

Eligible applicants for NAHTF include:

- Governmental subdivisions
- Public housing authorities
- Community action agencies
- Community-based, neighborhood-based, or reservation-based nonprofit 501(c)(3) or 501(c)(4) organizations

For-profit entities working in conjunction with one of the other eligible applicant organizations are eligible to receive NAHTF funds. The eligible applicant organization must be the applicant for the NAHTF funds and shall be the entity that enters into the DED contract.

Eligible Activities

The activities listed below are eligible for NAHTF assistance, as provided in Section 58-706 of the Nebraska Affordable Housing Act:

- New construction, rehabilitation, or acquisition of housing to assist low-income and very low-income families;
- Matching funds for new construction, rehabilitation, or acquisition of housing units to assist low-income and very low-income families;
- Technical assistance, design and finance services, and consultation for eligible nonprofit community or neighborhood-based organizations involved in the creation of affordable housing;
- Matching funds for operating costs for housing assistance groups or organizations, when such grants or loans will substantially increase the recipient's ability to produce affordable housing;
- Mortgage insurance guarantees for eligible projects;
- Acquisition of housing units for the purpose of housing preservation to assist low-income or very low-income families;
- Projects making affordable housing more accessible to families with elderly members or members who have disabilities;
- Projects providing housing in areas determined by DED to be of critical importance to the continued economic development and well-being of the community, and where, as determined by DED, a shortage of affordable housing exists;
 - *For the 2023 Program Year, Disaster Recovery Housing Projects (must be included in DR-4420) and projects resulting in new units are determined to be of critical importance and are included in the Housing Projects Funding Cycle.*
- Infrastructure projects necessary for the development of affordable housing (support activity implemented in conjunction with the development of affordable housing units only)
- Down payment and closing cost assistance;
- Demolition of existing vacant, condemned, or obsolete housing or industrial buildings or infrastructure (*support activity implemented in conjunction with the development of affordable housing units only*);
- Housing education programs developed in conjunction with affordable housing projects. Education programs must be directed toward:
 - Preparing potential homebuyers to purchase affordable housing; post-purchase education;
 - Target audiences eligible to utilize the services of housing assistance groups/organizations;
 - Developers interested in the rehabilitation, acquisition, or construction of affordable housing.
- Support for efforts to improve programs benefiting homeless youth;
- Vocational training in the housing and construction trades industries by nonprofit groups; and,

- Weatherization and solar or other energy improvements to make utilities for housing more affordable.

Matching Requirements

There is no match requirement for NAHTF Housing Development Projects or Nonprofit Technical Assistance applications. There will be no points given for match of Technical Assistance projects. However, points will be awarded for cash match committed to NAHTF Housing Development Projects. Applicants providing cash match recognize that only project related costs incurred by the applicant are eligible. All cash match must be expended by the DED recipient during the contract period and must be expended in proportion to the amount of NAHTF project costs drawn per line item in the contract budget with the Department. Cash match points will not be awarded for general administration, housing management, lead-based paint testing and/or project related soft costs and any cash match in these categories at time of application will not be included in a DED contract if awarded.

Leverage

NAHTF resources are not intended to fund entire projects. Leveraged funds are other resources used for project financing that do not meet the cash match definition but are additional sources used to finance the project during the open contract period. Leveraged funds are not included in the contract budget but are considered an important part of the project and are considered during project scoring. The source, use and amount of Leveraged Funds to be expended during open contract period are described in the Leveraged Funds section of the application.

These resources leveraged for project financing during the open contract period may include owner equity, bank financing, private investment, or other public funds. Homeowner mortgages and rental payments are not considered project financing, therefore are not leveraged funds. NAHTF projects that leverage other funding resources are capable of providing more housing opportunities and economic growth in the community.

Selection Criteria and Process

The State’s main objective for distributing NAHTF resources is to invest funds in quality projects and programs that help eligible applicants leverage private financing to create permanent, energy efficient, and affordable housing that addresses local needs. State resources are limited and there is an increasing demand for NAHTF award distribution, therefore cash match, leveraging other funds, and demonstrating repayment and/or efficient and timely use of NAHTF resources are priority objectives. NAHTF applications will be reviewed and competitively scored using the following scoring methodology. The points awarded may be within the range stated and based on a variety of factors, including, but not limited to quality of answer, alignment with NAHTF priorities, etc.:

SELECTION CRITERIA FOR HOUSING PROJECTS	
Criteria	Points Possible
Project Design (100 available)	
Described project type, units, and significant details of the project	40
Described Target Beneficiaries AMI & Affordability Period	20
Described project readiness factors of the project	20
Described visitability and/or accessibility features of the project for people with disabilities	20
Need and Impact (100 available)	
Described how need is proven through housing study and/or other data	50
Described potential impact of Project on the service area	50
Project Financing (50 available)	
Described sound financing plan and aligned with Pro-Forma when applicable	30
Described Other Sources used to finance project including any Pre-Development funding	20
Capacity and Collaboration (50 available)	
Applicant demonstrated capacity for administering project	40
Applicant demonstrated collaboration with community, project team or funding partners	10

Legislative Priorities (10 available) All Project units are in an Enterprise Zone (2 points) All Project units are in an Opportunity Zone (2 points) All Project units are in an officially Blighted Area (2 points) Project will serve Households at or Below 80% of AMI <ul style="list-style-type: none"> • 25%-49% of units will serve households at or below 80% AMI = 1 point; • 50%-74% of units will serve households at or below 80% AMI = 2 points; • 75%-99% of units will serve households at or below 80% AMI = 3 points; • 100% of units will serve households at or below 80% AMI = 4 points 	10
Disaster Recovery DR-4420 (design, beneficiaries, narratives – 5 available)	5
Affordability Period 5 years = 0 points 8 years = 6 points 6 years = 2 points 9 years = 8 points 7 years = 4 points 10 years = 10 points	10
New Units Created (1 NAHTF unit = 2 points, not to exceed 30 points) *Newly constructed, based on total # of NAHTF units constructed during open contract.	30
Preservation of Units (1 NAHTF unit = 1 point, not to exceed 50 points) * Only Applicable to Owner-Occupied Rehabilitation, Rental Rehabilitation and Purchase/Rehabilitation/Resale Projects. Not Applicable to Homebuyer Assistance Only and Homebuyer Assistance with Rehabilitation Projects.	50
Matching Funds [Match ÷ Total NAHTF Project Costs] x 100 x .5 (Project Costs do NOT include Administrative Costs) *(Department will round up to nearest whole number for Matching Funds Points)	50
Total Possible Points	455
Note: Points threshold for fundability is 300 points. Fundability does not guarantee an award.	

SELECTION CRITERIA FOR NON-PROFIT TECHNICAL ASSISTANCE	
Criteria	Points Possible
Project Design (200 available) Project Description with objectives Measurable goals to meet objectives	50 150
Impact on Housing Production (100 available) Project goals will impact the capacity for housing development activity Description of need and barriers that award will help overcome	50 50
Sustainability (50 available) Description of how goals will impact sustainability of the organization	50
Organizational and Financial Management (50 available) Description of organization structure and financial stability Description of policies and processes for internal controls	25 25
Total Possible Points	400
Note: Points threshold for fundability is 260 points. Fundability does not guarantee an award.	

The competitive scoring process considers the NAHTF program Legislation’s First Priorities:

- Serves the lowest income occupant
- Serves qualified occupants for the longest period of time
- Projects located wholly or in part within a designated Enterprise Zone, pursuant to the Enterprise Zone Act, Nebraska Revised Statutes §13-2101 through §13-2112
- Projects located in a designated Opportunity Zone, pursuant to the Federal Tax Cuts and

Jobs Act, Public Law 115-97

- Projects located wholly or in part within an area that has been declared an Extremely Blighted Area under Nebraska Revised Statutes §18-2101.02

Additionally, applicants with open DED NAHTF Housing awards must meet the milestones outlined in the table below by the due date of the pre-application (March 9, 2023). If these milestones are not met by March 9, 2023, the applicant must provide a detailed plan within their pre-application outlining how previous NAHTF housing awards will be in compliance with the milestones by the date of full application (May 11, 2023). DED will consult with applicants on a case-by-case basis if necessary.

Applicants not meeting the milestones outlined in the table below by May 11, 2023, will not be eligible for funding in the 2023 NAHTF application cycle.

Milestones Table

<u>NAHTF Program Year</u>	<u>Milestone</u>
2018 and earlier	100% of funds drawn
2019	90% of funds drawn
2020	50% of funds drawn
2021	20% of funds drawn
2022	Must have achieved Release of Funds by May 11, 2023

Amendments

DED reserves the right to make changes to the Nebraska Affordable Housing Trust Fund QAP and any applicable amendments at its discretion. If DED determines it is necessary to amend the QAP, the proposed amendment will be submitted to the DED Director for review and approval. If approved, a press release will be issued, and the proposed amendment will be made available on the DED website (opportunity.nebraska.gov) for a 14-day public comment period. At the end of 14 days, DED will consider any public input that has been provided, after which the Director will issue final approval of the amendment. The QAP, including any amendments, will subsequently be made available on the agency website.

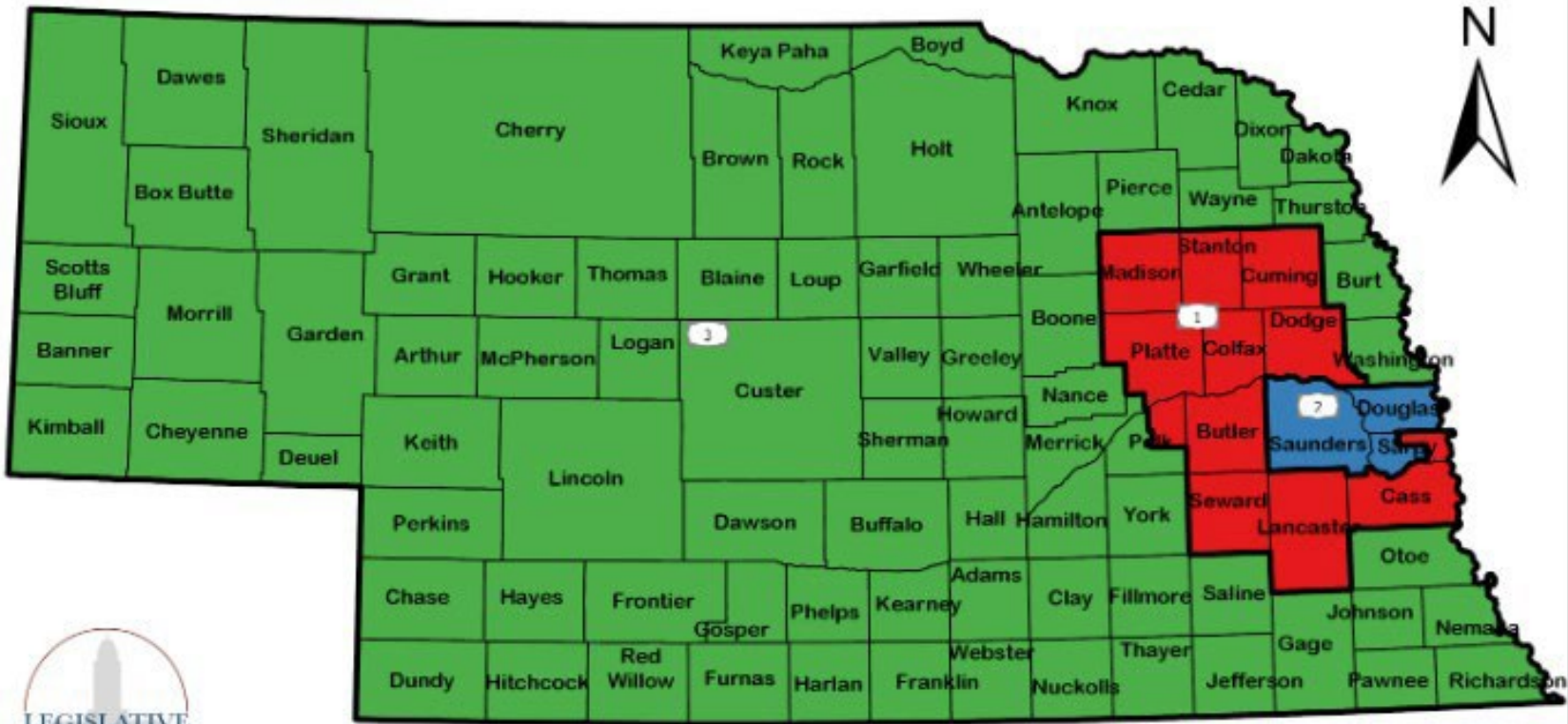
Housing Contact Information

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Created by Legislative Research
 Source: US Census Bureau
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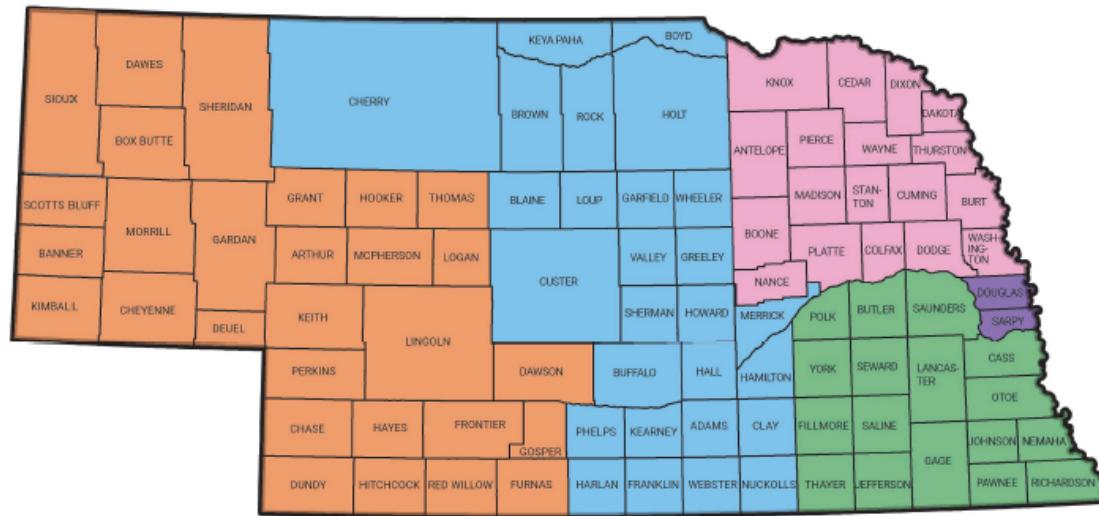
CONG21-39001 Introduced
 Placed on General File by Committee
 Committee Adoption, 5-4
 Amended by CONG21-39002
 Passed 35-11-3 on Final Reading

District	Deviation
1	0%
2	0%
3	0%



Attachment 2 – NDED Housing Program Representative Map

Nebraska Department of Economic Development:
Housing Program Representative Regions (NAHTF, CDBG, HOME, HOME-ARP, HTF, RWHF & MIWHF)



Director of Housing

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Metro Area

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Attachment 3 – Public Comments

From: [REDACTED]
To: [DED NebraskaAffordableHousingTrustFund](#)
Subject: About housing
Date: Wednesday, November 30, 2022 11:40:33 AM

Hello, My name is [REDACTED]. I am replying to an email about affordable housing and was wondering how my son and I can sign on. We have forty days to get out of the house we are in due to landlords health so he had to sell the house. I am a single mother of a 5 year old child and need help finding an affordable place. We have 1 dog who is well mannered and does not bother anyone along with a cat who goes outside during the day and indoors at night.

Sincerely,

[REDACTED]

P.S. Get back to me ASAP?

[REDACTED]

JANUARY 4, 2022

Nebraska Department of Economic Development

Housing and Community Development

245 Fallbrook Blvd, Suite 2

Lincoln, NE 68521

c/o: DED.NebraskaAffordableHousingTrustFund@nebraska.gov

RE: PUBLIC COMMENT ON 2023 QAP FOR NAHTF

Housing and Community Development Leadership:

Thank you for this opportunity to provide comment on the 2023 Qualified Allocation Plan (QAP) for the Nebraska Affordable Housing Trust Fund (NAHTF). The transparency of the QAP administrative review process is an important feature of the State housing program and affirms the willingness of Department Leadership to be responsive to the evolving needs of the state. We are proud to be a regular recipient of these funds and provide the following feedback based on that expertise.

Award Limit | Support

NeighborWorks Lincoln is in full support of the adjusted award maximum, to \$750,000, as it reflects the realities of the contemporary construction industry in a moment of rampant cost escalation. Further, higher per-project allowances will help the NAHTF facilitate additional units made possible by the economies of scale enjoyed by larger projects. NeighborWorks Lincoln will likely submit requests for projects that may not meet this maximum, but the flexibility is welcome for special projects/housing program.

General Administration & Housing Management | Support

We are also supportive of the State's recent changes to the "General Administration" funding request process simplified in the 2022 procedures of the NAHTF. "Housing Management" fees of up to \$5,000 per unit with a \$75,000 project cap recognizes the economies of scale enjoyed by larger, multi-unit projects of fifteen or more NAHTF-assisted units and is a responsible governor of State Funding.

Developer Fee | Revision Sought

Limiting "Developer Fee" to 15% of the "Primary Activity" cost is an unnecessary restriction that complicates fee calculations and caps them artificially low in certain project models. The fee should be calculated as a percentage (adjusted, if necessary) of total development cost (TDC) of NAHTF-assisted units.

Nonprofit Technical Assistance | Revision Sought

The \$20,000 annual limit for this program is insufficient to offset organizational capacity or overhead expenses associated with affordable housing development. The funds could be of great use to help cover predevelopment expenses for nascent developers, but for the complexity of the application. (NeighborWorks Lincoln estimates that a request for NAHTF support is an investment of between \$6,000 and \$15,000 in personnel resources.) The State should raise the threshold AND streamline the application. The Nebraska Investment Finance Authority runs a similar program (NIFA Outreach Partnership Program) that might be a source of critical insight for Department Leaders.

Matching Requirements | Revision Sought (Priority)

This is a top priority. The development of affordable housing is an inherently risky endeavor that requires not-for-profit developers to “front” what sometimes amounts to hundreds of thousands of dollars in predevelopment expenses, including land acquisition, site clearance and demolition, holding costs, security, and consultant fees. These expenses are often incurred before application to NAHTF is made and almost always prior to the release of funds. These activities are necessitated by the dynamics of local real estate markets (purchase agreements of six or more months are not practical) as well as the State’s preference to fund projects where site control is demonstrated and projects can be readily implemented in the grant performance period. For these reasons, the definition of match dollar eligibility should be expanded to include expenses incurred on behalf of NAHTF-assisted units (1) prior to the contract period and (2) on line items separate from those where NAHTF assistance is being utilized, chiefly for site acquisition and demolition. The current system requires affordable housing developers to be “cash poor” throughout the life of a project and disadvantages grantees from future awards based on drawn fund (“Milestone”) requirements (see below).

Disaster Recovery DR-4420 | Revision Sought

Pending any legislative requirements otherwise, these points should be omitted from the selection criteria and discontinued from future funding cycles. The principle disaster on which the NAHTF program should be solely focused is the statewide affordable housing deficit, regardless of compounding events.

Milestone Threshold | Revision Sought (Priority)

This is a top priority. NeighborWorks Lincoln fully appreciates the NDED’s mandate to award these funds and ensure their timely application; however, the unique and compounding effects of the global COVID19 pandemic (and its corollary influence on inflation, international supply chain stability, and local construction economics) results in a tangible hardship for previous funding recipients subsequently disadvantaged from continued program participation. This is especially true for affordable housing developers with multiple open awards (paradoxically, the State’s most reliable performers), as the odds of at least one project encountering an unforeseen implementation hurdle increase exponentially with each award. While a noble attempt to coax performance, the Milestones are impractical and counterproductive in their rigidity and forces grantees to go to extraordinary lengths to satiate superficial numeric requirements. In one unique case, we were forced to quickly *buy a \$150,000 neighboring property* to satisfy the City’s confusion over a lot line in order to get a building permit and meet a State Milestone requirement (or else forfeit \$1.5Mn in potential future awards). We *plead* with the Department to discontinue the Milestone requirements altogether (preferred) or convert them into an incentive within the selection criteria.

We are hopeful that Department leaders will continue to leverage the flexibility of the NAHTF program to make it more responsive and user-friendly than other federally restricted housing programs. Please contact me directly (402.477.7181x202) if I can provide additional clarity or detail.



Wayne A. Mortensen, AIA
Chief Executive Officer

Cc: Board of Directors

From: [Melanie O'Brien](#)
To: [DED NebraskaAffordableHousingTrustFund](#); [Pierce, Barb](#)
Cc: [Dalene Skates](#)
Subject: 2023 NAHTF QAP Public Comments
Date: Tuesday, January 3, 2023 10:24:25 AM

Dear Barb -

As you may recall, we were in touch last year regarding North Platte Area Habitat for Humanity's interest in the DED NAHTF grants. We are considering applying in 2023 and have been in discussion with several experienced organizations about their services in aiding us in this endeavor, through administration, etc. To that end, we reviewed the QAP and have the following comments:

1. In what scoring category are Leveraged Funds weighted - Project Financing?
2. Can major donations/discounts on such things as land and demolition costs be considered Leveraged Funds (vs. Capacity and Collaboration)?
3. NAHTF grantees and their amounts are announced in press releases but can you publish them on the DED NAHTF website page, as well, for reference?
4. Housing studies are expensive so regarding a project's "Impact and Need," how recent do housing studies need to be in order to be used as supporting data or is that at the discretion of DED?

Since we are new to this process, if the public comments are not the appropriate forum for these questions, please let me know.

Best regards,

Melanie O'Brien, Grant Writer
North Platte Area Habitat for Humanity
c: 308-660-6586

January 3, 2023

To: DED.NebraskaAffordableHousingTrustFund@nebraska.gov
Nebraska Department of Economic Development (DED)
Nebraska Affordable Housing Trust Fund administrator

From: NeighborWorks Northeast Nebraska

Please see below for the NeighborWorks Northeast Nebraska (NWNEN) public comments concerning the Proposed 2023 Nebraska Affordable Housing Trust Fund Qualified Action Plan (QAP).

Public Comment Process

NNWEN continues to commend DED for conducting and being responsive to the 2023 NAHTF QAP Focus Group input sessions. We encourage DED to continue this practice and to make sure that there is ample opportunity for those who want to participate.

Funding Cycles and Limitations

NWNEN supports the increase in the maximum NAHTF award amount to \$750,000 in project costs (excluding General Administration, Housing Management and Lead-Based Paint Testing). With the continuation of the steady increase of costs associated with construction, this is a welcome change to the Plan.

After discussion, we make the following comments related to “soft costs” associated with the production of affordable housing development:

- NWNEN supports the 8% in NAHTF - requested project costs for General Administration but asks that DED remove the \$20,000 cap for General Administration. \$20,000 has never been enough to cover the administration costs of the program. With a higher award we would hope to develop more units therefore not only adding costs to the administration of the grant but the housing management as well. An 8% of \$750,000 is \$60,000. When you calculate \$20,000 of \$750,000 it is 2.6%. There is a very large discrepancy (\$40,000 or 5.4%) between the two numbers. We are asking you to either make it a solid dollar amount (i.e., \$40,000) or a percentage amount (i.e., 5%). We are asking you to make it a percentage of 8% with the max being closer to the \$60,000 (i.e., \$50,000).
- NWNEN supports the \$5,000 in Housing Management per NAHTF-assisted unit on projects with a primary activity of new construction, purchase/rehab/resale, owner

occupied rehabilitation, rental rehabilitation, and rental conversion, but asks that DED to remove the \$75,000 cap for Housing Management costs on these projects.

- NWNEN supports the \$2,500 in Housing Management per NAHTF-assisted unit on projects with a primary activity of Homebuyer Assistance but asks that DED raise the amount for those Homebuyer Assistance projects with minor Rehabilitation be raised to \$5,000 per assisted unit. We also ask that DED remove the cap of \$75,000 on all these projects.

NWNEN also suggests that DED eliminate the NAHTF-funded developer fee allowance cap of 15% of the NAHTF-funded Primary Activity Cost. The developer fee should not be a percentage (%) it should be a per unit amount (ex., \$12,000 per unit). An average for-profit developer charges \$15,000 to \$30,000 per unit. It is incredibly expensive to develop homes. A percentage cap discourages developing more units. We should incentivize more development by allowing developers to earn a reasonable developer fee.

Selection Criteria and Process

Project First Priorities, you should not point to all or nothing. Needing to do all units at 80% AMI or lower discourages applicants from committing to doing any 80% AMI.

The match should not be a one to one for points it should be a two to one.

Total possible points is inaccurate. It states that 450 points are possible but New Units Created and Preservation of units are contradicting each other. Not sure how to deal with this issue.

Thank you,



NeighborWorks Northeast Nebraska Management Team
Roger D. Nadrchal, CEO
Quelbin Izaguirre, COO
Karen Eisenbraun, CFO



Affordable Housing Builds Strong Communities

January 3, 2023

From: Carol Bodeen, Director of Policy & Outreach

To: DED.NebraskaAffordableHousingTrustFund@nebraska.gov
Nebraska Department of Economic Development (DED)
Nebraska Affordable Housing Trust Fund (NAHTF) Administrator

Please see below for the Nebraska Housing Developers Association (NHDA) public comments concerning the Proposed 2023 Nebraska Affordable Housing Trust Fund Qualified Action Plan (QAP).

Public Comment Process

NHDA continues to commend DED for conducting and being responsive to the 2023 NAHTF QAP Focus Group input sessions. We encourage DED to continue this practice and to make sure that there is ample opportunity for those who want to participate.

Allocation of Funds

The NHDA Policy Committee reviewed and discussed the proposed 2023 NAHTF program year allocation for NAHTF-eligible activities and State Administration costs. It was noted that the amount estimated for State Administration had been increased to \$1,250,000 compared to \$844,000 in the 2022 program year. This is an almost 50% increase. It is hoped that this increase is allocated to support higher wages for staff members.

Discussion was also held on the \$1,275,000 Discretionary Funds allocation and more specifically the \$1,000,000 in conjunction with the 2023 joint application with the Nebraska Investment Finance Authority 9% Low-Income Housing Tax Credit program. NHDA suggests that the allocation be adjusted in a way that would allow for the maximum award amount to adequately reflect the Department's ability to fund two projects.

Funding Cycles and Limitations

NHDA supports the increase in the maximum NAHTF award amount to \$750,000 in project costs (excluding General Administration, Housing Management and Lead-Based Paint Testing). With the continuation of the steady increase in costs associated with construction, this is a welcome change to the Plan.

After discussion within the NHDA Policy Committee, we make the following comments related to "soft costs" associated with the production of affordable housing development:

- NHDA supports the 8% in NAHTF -requested project costs for General Administration, but asks that DED consider removing the \$20,000 cap for General Administration.



- NHDA supports the \$5,000 in Housing Management per NAHTF-assisted unit on projects with a primary activity of new construction, purchase/rehab/resale, owner occupied rehabilitation, rental rehabilitation, and rental conversion, but asks that DED consider removing the \$75,000 cap for Housing Management costs on these projects.
- NHDA supports the \$2,500 in Housing Management per NAHTF-assisted unit on projects with a primary activity of Homebuyer Assistance, but asks that DED consider raising the amount for those Homebuyer Assistance projects with minor Rehabilitation be raised to \$5,000 per assisted unit. We also ask that DED consider removing the cap of \$75,000 on all of these projects.
- NHDA also suggests that DED consider eliminating the NAHTF-funded developer fee allowance cap of 15% of the NAHTF-funded Primary Activity Cost. It is customary to have a developer fee allowance based on the percentage of the cost to develop the property. This QAP cap of 15% of NAHTF-funded developer fee of the NAHTF-funded primary activity adds a sub-cap which is confusing. This may be difficult to manage for some grantees who are subject to a developer fee percentage of project cost maximum for other funders. NHDA supports the intention of the developer fee allowance cap to specify what DED considers to be a reasonable developer fee. NHDA recommends instead a developer fee allowance cap of 15% of total per unit or project cost (depending on the type of project).

Selection Criteria and Process

NHDA recommends a shorter written application for NAHTF technical assistance funds. NHDA understands and supports that simplifying the written proposal may require DED to include another step in the review process such as a phone interview with the applicant. The annual maximum of \$20,000 represents much needed operational funds for these non-profit organizations, and as such, NHDA suggests that the effort to receive those funds should be considerably less than the effort required to successfully be awarded other NAHTF grant funds.

NHDA recommends changes to the Milestones threshold requirement for previous awards and drawn funds. Considering the negative impacts of the coronavirus pandemic on the economy and the housing industry, NHDA does not believe a threshold for drawn funds for grants awarded in the 2020 and 2021 program years is reasonable. In addition, during 2022, DED implemented changes to the software and process for requesting funds. This affected the ability to expeditiously request and draw funds even if eligible expenses have been incurred.

Conclusion

NHDA suggests that should additional funds become available within the NAHTF after this 2023 QAP is made final, that those funds be distributed proportionally according to the allocation chart contained within this QAP.

DED's openness to suggestions for improvements and changes is apparent in this year's process and draft product. NHDA is appreciative of this approach and looks forward to the continuing positive relationship between our organizations in 2023.

Thank you,



Carol Bodeen, Director of Policy & Outreach



January 4, 2023

Nebraska Department of Economic Development (NDED)
Nebraska Affordable Housing Trust Fund (NAHTF) Administrator
DED.NebraskaAffordableHousingTrustFund@nebraska.gov

RE: Public Comment on the Proposed 2023 Nebraska Affordable Housing Trust Fund Qualified Allocation Plan (QAP)

On behalf of NeighborWorks® Home Solutions (NWHs) I am providing official written comments on the Proposed 2023 NAHTF Qualified Allocation Plan (QAP). Please find comments below:

Public Comment Process

NWHs appreciates the opportunity to provide public comments and recognizes NDED for their responsiveness to the public comments provided as part of the QAP process.

Housing Priorities

NWHs fully supports the housing priorities within the QAP. Providing affordable housing to communities across the State continues to be challenging as a result of the Global Pandemic of 2019, making it as important as ever to have funding opportunities available such as the NAHTF.

Allocation of Funds

NeighborWorks® Home Solutions submits the following comments regarding Allocation of Funds:

- It is noted that the State Administration costs are estimated to be \$1,250,000, which is nearly a 50% increase from the 2022 program year of \$844,000. NWHs supports this increase should it be allocated to support higher wages for the Housing staff members, particularly with the recruitment and retention challenges that are presented in the workforce industry-wide.
- In relation to the 2023 joint application with the Nebraska Investment Finance Authority 9% Low-Income Housing Tax Credit program, NWHs recommends the allocation be modified in a way that would allow NDED to fund two projects at the maximum award amount.

Funding Cycles and Limitations

NWHs supports the increase of the 2023 maximum NAHTF award of \$750,000 in project costs (excluding General Administration, Housing Management, and Lead-Based Paint Testing). The housing industry continues to experience increased overall project costs, including increased materials and labor costs. Housing demand is still strong and has created labor and supply shortages which further drives up project costs due to increased project timeline deliverables. These issues continue to be a result of the Global Pandemic of 2019.

NWHS submits the following comments regarding “soft costs” associated with the development of affordable housing projects:

- General Administration: NWHS supports the 8% in NAHTF-requested project costs for General Administration, but requests NDED to consider removing the \$20,000 cap.
- Housing Management:
 - NWHS supports the \$5,000 in Housing Management per NAHTF-assisted unit on projects with a primary activity of new construction, purchase/rehab/resale, owner-occupied rehabilitation, rental rehabilitation, and rental conversion, but requests NDED to consider removing the \$75,000 cap.
 - NWHS supports the \$2,500 in Housing Management per NAHTF-assisted unit on projects with a primary activity of homebuyer assistance, but requests NDED to raise this amount to \$5,000 per NAHTF-assisted unit for those homebuyer assistance projects with minor rehabilitation. NWHS also requests NDED to consider removing the \$75,000 cap.
- Deferred Developer Fee: NWHS requests NDED to eliminate the NAHTF-funded developer fee allowance cap of 15% of the NAHTF-funded Primary Activity cost. It is customary to have a developer fee allowance based on the percentage of the cost to develop the property. This QAP cap of 15% of NAHTF-funded developer fee of the NAHTF-funded primary activity adds a sub-cap which is confusing. This may be difficult to manage for some grantees who are subject to a developer fee percentage of project cost maximum for other funders. NWHS supports the intention of the developer fee allowance cap to specify what NDED considers to be a reasonable developer fee. NWHS recommends instead a developer fee allowance cap of 15% of total per unit or project cost (depending on the type of project).

Selection Criteria and Process

NWHS supports the maximum Nonprofit Technical Assistance award of \$40,000 over a two-year period. These are much needed operational funds for nonprofits. NWHS requests a shorter written application for the NAHTF Nonprofit Technical Assistance funds.

NWHS requests NDED make a change to the Milestones threshold requirement for previous awards and drawn funds. The Global Pandemic of 2019 has had significant negative impacts to the housing industry and NAHTF awardees, and as such NWHS does not believe the threshold for grants awarded in the 2020 and 2021 program years is reasonable.

Thank you for the opportunity to review and comment on the Proposed 2023 NAHTF Qualified Allocation Plan (QAP).

Sincerely,



Leslie Coleman
Chief Executive Officer



812 S 24th Street | Omaha, NE 68108

January 4, 2023

Nebraska Department of Economic Development
245 Fallbrook Boulevard
Suite 002
Lincoln, NE 68521

RE: 2023 Nebraska Affordable Housing Trust Fund Qualified Allocation Plan

I submit the following comments on behalf of Together in support of the Nebraska Affordable Housing Trust Fund (NAHTF) Qualified Allocation Plan (QAP). Together is a nonprofit organization committed to preventing and ending hunger and homelessness in the Omaha area, with day-to-day operations focused on assisting participants who face food and housing insecurity. This work takes us to the front lines of the housing crisis—for example, our case managers conduct hundreds of housing searches each month, seeking safe, affordable housing for participants at risk of or exiting homelessness. We have firsthand experience with the immense time and effort required to find quality accessible housing, and we witness the enormous toll the housing crisis takes on our most vulnerable community members.

Programs like the NAHTF are critical components in efforts to close the housing affordability gap and address the housing crisis in Nebraska. Together applauds the NAHTF’s stated objective to invest funds in “quality projects and programs that help eligible applicants leverage private financing to create permanent, energy efficient, and affordable housing that addresses local needs.” But affordable for whom? The QAP is less clear on this point, though of course affordability is a wide spectrum. While supporting materials offer more specifics, the current QAP insufficiently incentivizes housing projects aimed at the most vulnerable populations. We offer the following comments to draw the Department’s attention to marginalized Nebraskans who are particularly at risk of housing instability. Housing aimed at these populations is only feasible with government support and is unlikely to be built without incentives. We urge the Department to specifically incentivize projects that prioritize housing for individuals and families exiting homelessness, very low- or extremely low-income renter households, aging populations, and those with disabilities.

In December of 2022, the Interagency Council on Homelessness released *All In: The Federal Strategic Plan to Prevent and End Homelessness*, which highlights the role of permanent supportive housing (PSH) in solving homelessness. Permanent supportive housing, implemented using a Housing First approach, is a proven solution to homelessness that not only creates housing stability but improves individuals’ health and wellbeing. Unfortunately, many Nebraskans experiencing chronic homelessness are denied this opportunity despite their eligibility—simply because there is an extreme lack of PSH units available. At present, the full scope of positive outcomes is stymied by lack of supply, and thus we urge

the Department to better incentivize PSH development, at minimum by awarding additional points to projects that include PSH units.

In a similar vein, the Department should consider amending the selection criteria to reward projects designed to be affordable for extremely low-income Nebraskans with additional points. Currently, there are 56,996 extremely low-income renter households in Nebraska, according to the National Low Income Housing Coalition, and 68% of those households are severely housing-cost burdened (meaning a household pays more than half of their income on housing). The scarcity of economically feasible housing is profound: for every 100 extremely low-income households, there are only 38 affordable rental units available. Selection criteria that prioritized this issue could encourage applicants to submit projects that include units affordable for extremely low-income renters and help address the critical shortage that generates severe housing insecurity and risk of homelessness.

Finally, we encourage the Department to tailor the selection criteria to prioritize projects that include accessible units for aging and disabled Nebraskans. The NAHTF Administration Manual indicates that “[a]ll ground floor units must be visitable to the maximum extent feasible, unless doing so would impose an undue financial burden on the project,” and the 2023 NAHTF QAP awards project design points for applications that simply describe the project’s visibility and/or accessibility. While drawing attention to accessibility and the minimum standards for ground floor units is important, the 2023 NAHTF QAP misses an opportunity to incentivize projects aimed at aging populations and individuals with disabilities. According to the U.S. Census Bureau, of the 1,963,692 people living in Nebraska, 446,574 are aged 60 or older—nearly a quarter of the state’s population (an additional 226,475 Nebraskans are between the ages of 50 and 59). A majority of those over age 60 live in owner-occupied housing, and 80% of those who do are not housing-cost burdened (meaning the household spends less than 30% of its income on housing). However, 21.7% of Nebraskans aged 60 and over are renters, and half of those tenants pay 30% or more of their income on housing. Additionally, 28.2% Nebraskans aged 60 and over have a disability. It is important that Nebraska address the present housing shortage and plan for future housing needs in the NAHTF QAP by incentivizing projects that create or rehabilitate housing that is physically accessible for those with a disability and financially accessible for those on a fixed income (and frequently reliant on a landlord’s acceptance of government housing assistance). Amending the selection criteria to award points for actually including accessible units is a crucial step to ensure aging and disabled Nebraskans have a safe place to live.

Thank you for your time and consideration of these comments. Please do not hesitate to contact me with any questions or for further information.

Sincerely,

Alicia Christensen

Director of Policy and Advocacy
Together
812 South 24th Street
Omaha, NE 68108
achristensen@togetheromaha.org

From: [Julieth Paola Bautista Becerra](#)
To: [DED NebraskaAffordableHousingTrustFund](#)
Subject: Housing Program Funding Opportunity
Date: Saturday, December 31, 2022 9:56:47 AM

Hello!

This is Julieth, a volunteer for the Global Orphan Hope organization. This organization has been providing housing opportunities for Ukrainian families in Norfolk, Nebraska. A friend mentioned to me the Nebraska Affordable Housing Trust Fund. My question is: Does the application for this program already closed?

I appreciate any information.

Best regards,

Julieth PB

Julieth P. Bautista

Sent from [Mail](#) for Windows

From: [Michael Sothan](#)
To: [DED_NebraskaAffordableHousingTrustFund](#)
Subject: Public Comments on Allocation of State Housing Funds
Date: Tuesday, November 29, 2022 1:20:03 PM
Attachments: [image002.png](#)
[image003.png](#)

A comment on the “Proposed Allocation of Anticipated \$12.75M in State Housing Funds.”

Funds for downtown residential should be considered and made available. Right now the CDBG programs are predominantly limited to downtown commercial leaving a huge opportunity gap. This is a missed opportunity when it comes to housing options, community development, and cost-effective solutions (density). These homes can be a strong mix of owner-occupied, rental, affordable, market rate, workforce, etc. Please help develop a plan that included downtown housing as part of a solution to be encouraged and invested in.

Thank you,



From: Nebraska Communities Internet Connectivity <NEDEV-L@LISTSERV.UNL.EDU> **On Behalf Of** Ellingson, Kate
Sent: Tuesday, November 29, 2022 12:44 PM
To: NEDEV-L@LISTSERV.UNL.EDU
Subject: updated email: DED to Accept Public Comments on Proposed Allocation of Anticipated \$12.75M in State Housing Funds

Non-NU Email

Please note – the correct email address to submit comments is:
ded.nebraskaaffordablehousingtrustfund@nebraska.gov

From: [REDACTED]
To: [DED NebraskaAffordableHousingTrustFund](#)
Subject: [REDACTED]
Date: Tuesday, January 3, 2023 5:57:45 PM

I have been completely homeless for the last 5 years of 12 years technically homeless. I would like to donate my time and money to help relieve the burden of homelessness across the State of Nebraska. This has been in the Amarillo, San Angelo, College Station municipal areas, as well as Kearney and Grand Island Ne., since 3-3-17. This was mostly time spent sleeping in automobiles in winter weather at sub zero temperatures.

[REDACTED]

Sent from [Mail](#) for Windows

Southwest Nebraska

Community Betterment Corporation

115 West 3rd St., PO Box 720, Grant, NE 69140

(308) 352-4338 * (308) 352-2683 - Fax

www.southwestne.com



SWNCBC Public Comments on 2023 QAP

January 4, 2022

SWNCBC would like to thank the Department of Economic Development for the opportunity to make public comment on the 2022 QAP. The following are our comments:

1. SWNCBC would like to express their appreciation of the Focus Groups that NDED held prior to the release of the proposed QAP. SWNCBC recognizes the time commitment for both NDED staff and grantees across the state to attend and was grateful that the meetings were offered remotely with multiple dates to select from. I would like to suggest that NDED have a way to share what the other thoughts and comments from the meetings were. It is always nice to hear other thoughts and ideas from fellow colleagues and peers.
2. SWNCBC supports NDED raising the maximum project/hard costs to \$750,000.
3. I am happy to see that NDED will be giving points for preservation of units. This is such a vital housing program for many small rural communities.
4. SWNCBC would like to see tentative timelines for Notice of Award, Contract Negotiations and Release of Funds dates in the QAP. This would allow applicants to use those dates in the application, milestones, and performance plan.

Again, thank you for the opportunity to make public comment on the 2023 QAP.

SWNCBC