

2024

**NEBRASKA
AFFORDABLE HOUSING
TRUST FUND**

QUALIFIED ALLOCATION PLAN

NEBRASKA DEPARTMENT OF
ECONOMIC DEVELOPMENT
EFFECTIVE JULY 1, 2024 - JUNE 30, 2025
(2024 PROGRAM YEAR)

NEBRASKA

Good Life. Great Opportunity.

DEPT. OF ECONOMIC DEVELOPMENT

NAHTF 2024 QAP



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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 2024 QAP with input gathered through three (3) in-person Focus Group meetings in September and October 2023 with customers of the DED, along with feedback gathered from the Strategic Housing Council led by the Nebraska Investment Finance Authority (NIFA) in 2023. 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 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 serves to make 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 DED's Annual Action Plan for the Community Development Block Grant (CDBG), HOME Investment Partnerships Program (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 is open to receiving input at each quarterly NCHH meeting. Changes and recommendations for the 2024 program year were specifically discussed at the November 14, 2023, NCHH quarterly meeting.

Public Comment Process

The 2024 QAP was submitted for a 30-day public comment period beginning on November 30, 2023. The public comment period concluded on January 4, 2024 at 11:59 PM (CT). All written comments submitted to DED during the public comment period were taken into consideration while completing the final 2024 NAHTF QAP. All written comments submitted to the Department on or before January 4, 2024, at ded.publiccomment@nebraska.gov are included as Attachment 4 within this document.

NAHTF Housing Priorities for 2024 Program Year

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 take action. 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 Economic Recovery Fund established under LB1014. These funding programs include the Pandemic Relief Housing Program and the Qualified Census Tract (QCT) Affordable Housing Program (AHP).

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.

The Program will serve beneficiaries that make at or below 120% of the Average Median Income (AMI) in the county they reside in. Beneficiaries in many Nebraska communities who are making at or near 120% AMI are considered a household in need of affordable workforce housing.

The Act allows for DED to set priorities for each program year. Priorities listed below for the 2024 NAHTF program are:

- New Affordable Housing Units for Homebuyers
- New Affordable Rental Housing Units
- Preservation and Rehabilitation of Existing Housing Units for Resale
- Financial Assistance for non-profits engaged in housing development requesting funding for one or more of the following activities:
 - Organizational Capacity Building
 - Strategic Planning and Housing Study Funding
 - Staff Training for Housing Development Activities

DED has identified the creation of new affordable housing and new rental units as its highest priority for the 2024 Program Year cycle. Therefore, scoring will reflect this prioritization of housing creation (new construction).

Nebraska's 2020-2024 Consolidated Plan for Housing and Urban Development (HUD) federal programs was finalized in June 2020 and was substantially amended in January 2023. 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 2024 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, new contracts entered into with recipients under the Nebraska Affordable Housing Trust Fund during the 2024 Program Year cannot exceed the spending authority approved during the 2024 Nebraska Legislative Session.

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 to each of Nebraska’s three (3) U.S. Congressional Districts (<https://www.census.gov/mycd/> or refer to Attachment 2).

The following table outlines the anticipated distribution of NAHTF funds for the 2024 program year, dependent upon receipts and available authorized spending authority as set by the 2024 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	
	\$11,175,000	Housing Projects
	\$300,000	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 a combination of factors: threshold requirements, DED priorities, demonstration of project design, project capacity and project readiness as well as ranking within each congressional district, pending the amount of funding available for that district per cycle.

There will be both subjective and objective elements considered for scoring projects. Due to the nature of having competing project types, applicants should not expect to be able to self-score but are expected to use the score tables provided in the 2024 Application Guidelines as a guide.

The remaining 10%, are discretionary funds, have no restriction with regard to congressional district distribution, stated priorities or other requirements and rankings. The remaining discretionary funds can be used at the discretion of the Department.

If NAHTF receives a proposed distribution higher or lower than estimated in the table above, 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; application must serve only one Congressional District
- Nonprofit Technical Assistance, two in each Congressional District

Housing Development Project Cost Maximum

The 2024 NAHTF maximum for a housing development project is \$750,000 for non-administrative project costs over a 3-year period. These include Primary and Support costs listed in the Application Guidelines. The Rehabilitation Primary Activity has a \$40,000 cap per unit for Rental Rehabilitation and Homeowner Owner-occupied Rehabilitation projects. Administrative costs of General Administration, Housing Management, and Lead-Based Paint Testing may be requested over and above the project costs and according to the maximums detailed in paragraphs below.

Technical Assistance Project Cost Maximum

The 2024 NAHTF maximum for Nonprofit Technical Assistance award is \$50,000 over a two-year period. General Administration, Housing Management and Lead Based Paint Testing are not eligible expenses for Nonprofit Technical Assistance applications.

General Administration Allowance

General Administration Allowance is offered to offset costs that are generally associated with administration related to award management. Typical costs include staff time to fulfill Special Conditions, accounting of funds, payment requests, Request for Proposals for services, marketing the program as a whole (not individual addresses), completion of Fair Housing activity, and completion of reports. Applicants will be eligible to request up to \$20,000 for General Administration. Applicants should evaluate need for General Administration by past experience with NAHTF award administration, as well as project type and number of units being proposed in the application in order to make a reasonable request..

Housing Management Allowance

Housing Management Allowance is offered to offset costs that generally tie back to specific addresses assisted by the project funds. Typical costs include finance-related costs; credit reports; title binders and insurance; surety fees; recordation fees; transaction taxes; legal and accounting fees (address-related); surveys, requests for bids; appraisals; site review and work write-ups; and related professional services; homebuyer/tenant education/counseling, pre-construction conferences, bid meetings; and staff costs directly related to projects. No hard costs are included. Applicants will be eligible to request up to \$5,000 in Housing Management per completed units defined in contract, not to exceed \$75,000 on projects with a primary activity of new construction (Homebuyer and Rental), Rental Conversion, Rental Rehabilitation and Homebuyer Purchase/Rehabilitation/Resale. 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 per award. 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 Testing Allowance

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.

Developer Fee: The Developer Fee is a Support Activity that may be requested by applicants who are also acting in the role of Developer. It is counted as part of the \$750,000 project cost maximum. Only projects with a Primary Activity of either New Construction or Purchase/Rehab/Resale where the applicant is also acting as the Developer, may select a Developer Fee as the support activity. The Developer Fee may either be \$15,000 per unit when project is not requesting a Housing Management Allowance or will be \$10,000 per unit if Housing Management is also being requested. Housing Management will not exceed \$5,000 per unit. The sum of the Developer Fee plus Housing Management Allowance being requested cannot exceed \$15,000 per unit.

Projects working with a private *for-profit* developer acting as a partner in the project may fund the *for-profit* entity's developer fee through the NAHTF New Construction activity budget as it is an eligible cost item for NAHTF projects. The Developer Fee charged by the *for-profit* developer should be included in the Development Cost Schedule within the project's Pro Forma packet. NAHTF Recipients should work with their legal counsel to create a developer agreement when working with a for-profit developer on a NAHTF project.

Funding Summary

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 balance 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, 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 version.

Application Process Summary

The 2024 NAHTF application cycle is anticipated to open on February 8, 2024. 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.

The Pre-Application due date is Thursday, March 07, 2024 by 5:00pm (Central Time)

The Full Application due date is Thursday, May 09, 2024 by 5:00pm (Central Time)

A **pre-recorded pre-application workshop** will be made available on the NAHTF webpage following the posting of the QAP and Application Guidelines. This will provide a walk-through of both the Technical Assistance and the Housing Development Pre-Applications.

A **Pre-recorded full application workshop** and open office hours will be offered. Review of the workshop and participation in open office hours is strongly recommended. The full application workshop will provide a walk-through of the Housing Development Application and the Technical Assistance Application.

Open Office Hours will be provided for applicants who have completed a pre-application. These virtual open office hours will provide a forum for applicants to ask questions related to the NAHTF application and will provide an opportunity for applicants, application preparers, developers, and housing organizations to ask **application** specific questions. **Project** specific questions should be directed to a DED Housing Program Representative.

Any pre-recorded or in-person workshops offered are recommended to all applicants, whether they are new or returning to the NAHTF Housing Funding Cycle. Applicants taking advantage of training made available through in-person or recorded workshops, training videos and open office hours tend to score higher than those who do not.

Other **Frequently Asked Questions** and topic-related recorded videos may come available during the application cycle. Applicants are advised to watch for announcements of such on the NAHTF website or via the [DED mailing list](#). Applicants are advised to reach out to the DED Housing Program Representative for their area to request technical assistance in order to receive project specific guidance that may not be covered in recorded workshops, videos, open office hours, etc. (see Attachment 3).

Application Guidelines and AmpliFund

Application Guidelines for the 2024 NAHTF application cycle will be posted on the DED website upon opening of the funding cycle. The Application Guidelines include detailed program information, application timeline, basic instructions, and will serve to answer common application-related questions. Application Guidelines change from cycle to cycle and should be reviewed carefully even when applicant is a returning applicant to the NAHTF program. Applicants are advised to review the *Post Award Management and Implementation* section of the Application Guidelines to help them determine whether their organization has the capacity to administer a NAHTF award.

Both the 2024 NAHTF pre-application and the full application 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 which is provided in this QAP and in the Funding Timeline found in the Application Guidelines. **No hard copy pre-applications or full applications will be accepted.**

Instructions for the use of the electronic database, AmpliFund, is available on the [DED Grants Help Center](#).

2024 NAHTF Anticipated Timeline

2024 NAHTF ANTICIPATED TIMELINE	
<u>Anticipated Dates</u>	<u>Action</u>
Tuesday, November 14, 2023	NCHH Quarterly Meeting-Review Proposed 2024 NAHTF QAP
Thursday, November 30, 2023	Proposed QAP Posted & Public Comment Period Begins
Thursday, January 4, 2024	QAP Public Comment Period Ends
Thursday, February 8, 2024	Final QAP Posted
Thursday, February 8, 2024	2024 NAHTF Application Guidelines Posted and 2024 NAHTF Funding Cycle Opens
Friday, February 16, 2024	2024 NAHTF Pre-Application Pre-Recorded Workshop Available
Thursday, February 22, 2024	Virtual Open Office Hour @ <i>from 10:00am to 11:00am (CT)</i>
Thursday, March 7, 2024	2024 NAHTF Pre-Applications Due by 5:00pm (CT)
Friday, March 8, 2024	2024 NAHTF Full Application Pre-Recorded Workshop Available
Thursday March 14, 2024	Virtual Open Office Hour; <i>from 10:00am to 11:00am (CT)</i>
Thursday, March 21, 2024	Site Review Forms Due for New Construction, Rental Rehabilitation and Rental Conversion Projects (<i>When Sites Have Been Pre-identified</i>)
Thursday, April 11, 2024	Virtual Open Office Hour; <i>from 10:00am to 11:00am (CT)</i>
Thursday, May 9, 2024	2024 NAHTF Applications Due by 5:00pm (CT)

Eligible Applicants

Eligible applicants for NAHTF include:

- Local and Governmental subdivisions
- State and federally recognized local or regional Public Housing Authorities or Agencies
- Community Action Agencies
- Community-based, Neighborhood-based, or Reservation-based nonprofit 501(c)(3) or 501(c)(4) organizations

Applicants designated as 501(c)(3) or 501(c)(4) will be asked to upload the Federal Tax-exempt Letter of Determination into the pre-application and full application verifying they are an active tax-exempt organization at time of application submission.

For-profit entities working in conjunction with an eligible applicant organization are eligible to receive benefit of the NAHTF funds as a partner in the project but will not be acting as a sub-recipient. The eligible applicant organization must be the applicant for the NAHTF funds and shall be the entity that enters into the DED contract and responsible for the project requirements, goals, and compliance throughout the affordability period.

Eligible Activities

The Nebraska Affordable Housing Act describes activities eligible for NAHTF assistance in Section 58-706 of the Nebraska Affordable Housing Act. Applicant should review DED's 2024 priorities as listed in section titled "NAHTF Housing Priorities for 2024 Program Year" of this QAP and review the 2024 Application Guidelines when determining project type and the eligible activities associated with that type.

Applicants may submit an activity not specifically identified as an option in the 2024 NAHTF application as long as it fits one of the eligibility criteria listed below. This would be considered an alternate activity. However, applicants will need to work closely with their Housing Program Representative to determine how the proposed alternate activity may or may not align with 2024 DED NAHTF Housing Priorities.

Eligible Activities; Nebraska Affordable Housing Act Section 58-706:

- 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 2024 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.

Cash Matching Funds

Matching Funds are unrestricted cash resources pledged by the applicant for use in the project to be available if project is awarded. There is no match requirement for applicants of NAHTF Housing Development Projects or Nonprofit Technical Assistance applications. However, points will be awarded for cash match committed to NAHTF Housing Development Projects. There will be no points given for match of Technical Assistance projects.

For-profit entities, i.e., private developers, receiving benefit of NAHTF assistance shall be required to provide an amount at least equal to ten percent (10%) of the amount of NAHTF assistance provided to the project. This provision is a requirement of the Nebraska Affordable Housing Act (LB86 2019).

Applicants providing cash match must sign a match commitment form submitted with application on applicant's letterhead recognizing that only project related costs incurred by the DED recipient are eligible to be paid with match funds.

All cash match must be expended by the DED Recipient during the contract period and must be expended, at a

minimum, 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 are not part of the cash match being declared for the project. Leveraged funds 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.

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. Projects that have a for-profit entity receiving benefit of the NAHTF assistance will show at least 10% of the amount of non-administrative NAHTF assistance provided to the project as leverage.

Pre-Development Costs

Pre-development costs are not considered “leverage” when evaluating the application because they have taken place outside the proposed open contract period. However, information about pre-development expenditures that took place prior to application submission is still valuable to reviewers and applicants are encouraged to include pre-development cost information in the Project Description Summary to be completed within their application.

Selection Criteria and Process

DED will process all applications and conduct a threshold review, a pro-forma evaluation (when applicable), and a competitive scoring process. At DED’s discretion, clarifying information may be requested of applicants at any point in the process following application submission. 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. Applicants with applications that do not pass the initial threshold review will be notified within 60 days of application due date that their application will not be scored and will be given reason for the decision.

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.

The following are priority selection criteria for DED when evaluating applications:

- Alignment with 2024 NAHTF program priorities,
- Presence of cash match,
- Presence of leveraged funds,
- Demonstration of intent to revolve NAHTF funds through the use of loans, in part or in whole so that repaid dollars may be used in future housing projects,
- Level of local government support and participation,
- Capacity and housing development experience of applicant and,
- History of efficient and timely use of NAHTF resources when applicant has been a previous Recipient.

NAHTF applications will be reviewed and competitively scored using both objective and subjective scoring criteria. Applications requiring the submission of a Pro-Forma will also undergo a Pro-Forma evaluation as part of the scoring process. See Attachment 1 for breakdown of scoring. Additional scoring details will be included in the 2024

Application Guidelines when published upon opening of the 2024 cycle.

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

- Serves the lowest income occupants,
- 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 and,
- Projects located wholly or in part within an area that has been declared an Extremely Blighted Area under Nebraska Revised Statutes §18-2101.02.

Projects that do not require site reviews, Pro-Formas, unit designs, cost estimates, etc. by nature of the project type will not have the same opportunity for points as project types requiring these items. This correlates with the fact that the Department has placed a high priority on new creation of units for the 2024 NAHTF program cycle. This may or may not be a factor in final award determination since final award funding is influenced by the number of applications, amount of funding available, mix of project types, and both objective and subjective factors.

Milestones Requirement

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 7, 2024). If these milestones are not met by March 7, 2024, 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 9, 2024). 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 9, 2024, will not be eligible for funding in the 2024 NAHTF application cycle.

Milestones Table

<u>NAHTF Program Year</u>	<u>Milestone</u>
2020 and earlier	100% of funds drawn
2021	75% of funds drawn
2022	30% of funds drawn
2023	Must have received Notice of Release of Funds by May 9, 2024

Amendments to QAP

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

Lynn Kohout, Director of Housing
Nebraska Dept. of Economic Development
245 Fallbrook Blvd, Suite 002
Lincoln, NE 68521
(402) 440-2599 or (800) 426-6505

Barb Pierce, Housing Specialist – NAHTF & CDBG
Nebraska Dept. of Economic Development
245 Fallbrook Blvd, Suite 002
Lincoln, NE 68521
(402) 936-4587 or (800) 426-6505

Attachment 1– Threshold & Scoring Tables

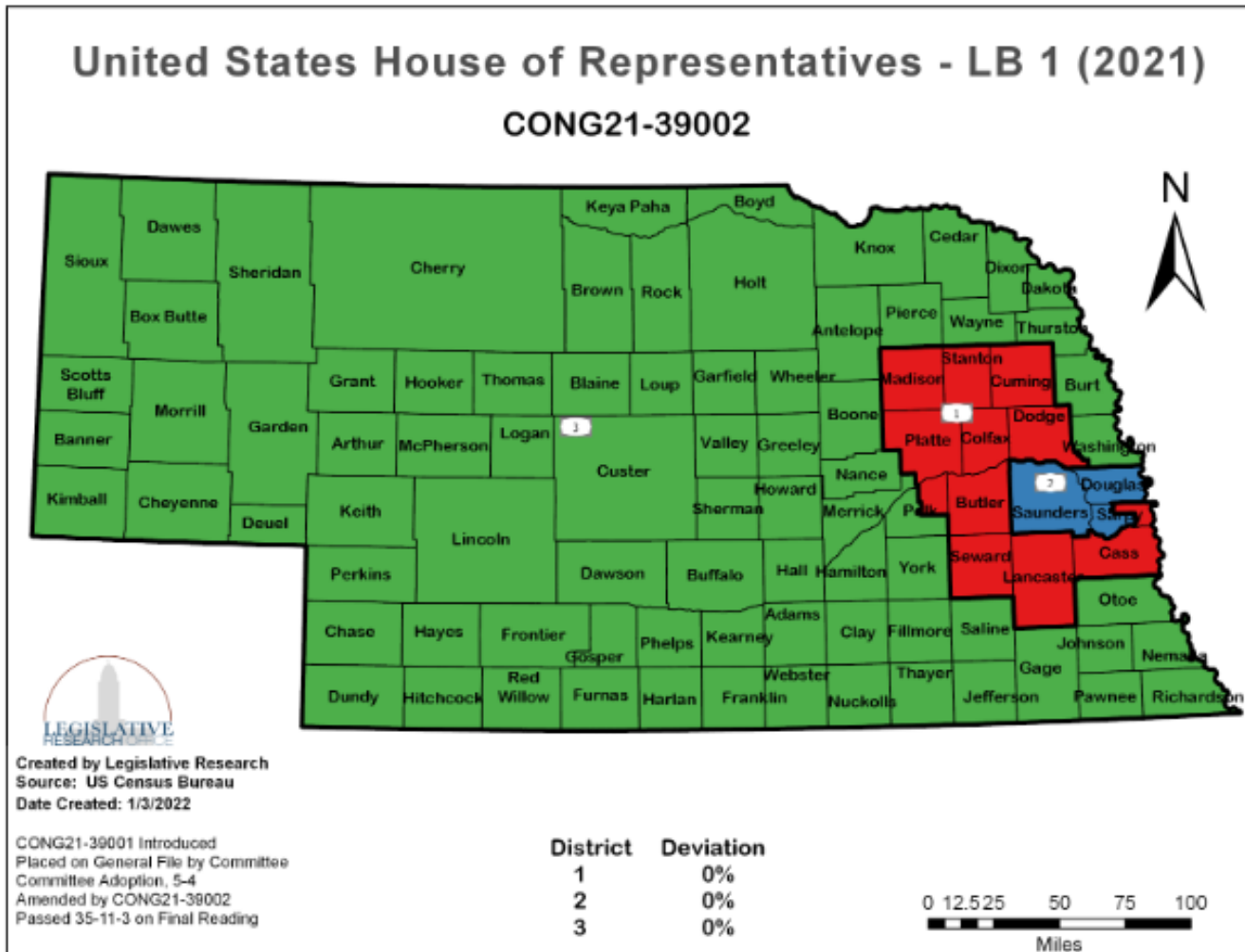
Applicable Project Type	THRESHOLD REVIEW for Housing Development & Technical Assistance Applications	Determination
All Project Types	Applicant submitted a pre-application by the required due date.	Eligible or Ineligible for scoring
All Project Types	Applicant is eligible to apply. <i>Applicants that are 501c3 or 501c4 must have IRS Tax-exempt Determination Letter uploaded. [DED will use GuideStar.org as a resource for checking nonprofit status and presence of any red flags.]</i>	Eligible or ineligible for scoring
All Project Types	Applicant selected correct congressional district for where project will be located.	If incorrect, flag for review and decision. If allowed, a resubmission correction is required within 24 hours of notification
All Project Types	Applicant applied within applicant organization’s AmpliFund portal.	Eligible or ineligible for scoring
All Project Types	Required milestones identified in QAP for current DED Housing awards have been met by submission due date.	Eligible or ineligible for scoring
All Project Types	All NAHTF requests are within allowed limits per the 2024 Application Guidelines	If not, flag for review and decision.
Homebuyer NC Homebuyer P/R/R Rental NC Rental Rehab Rental Conversion	Required Proforma was uploaded, (if required for project type).	Flag for review if missing. If allowed resubmission correction required within 24 hours of notification

Points Possible for Housing Development Applications Includes Subjective, Objective and Pro-Forma Evaluations				
Project Types	Total Points Possible	Objective Points Possible	Subjective Points Possible	Pro-Forma Points Possible
Homebuyer New Construction	120	57	55	8
Rental New Construction	120	57	55	8
Rental Conversion	120	57	55	8
Homebuyer Purchase/Rehab/Resale	110	47	55	8
Rental Rehabilitation	110	47	55	8
Homeowner-Occupied Rehabilitation	110	55	55	N/A
Homebuyer Assistance Only or w/Rehab	90	35	55	N/A

Selection Criteria and Points Possible for Non-Profit Technical Assistance Applications	
Criteria	Points Possible
Project Design (40 available) Variable. <ul style="list-style-type: none"> • Project Description Summary is clearly stated, and key information is addressed. Scored for quality of project and demonstrates capacity. • Organization Description Summary is clearly stated, and key information is addressed. Scored for quality of project and demonstrates capacity. • Performance Plan goals are measurable and align with selected activities. • Description and estimates of expenses are identified, reasonable and eligible. 	0-40
Impact, Sustainability and Collaboration (15 available) Variable. <ul style="list-style-type: none"> • Applicant demonstrates how Award will impact capacity of organization to increase housing development activity. • Applicant has a plan for sustainability of a new long-term financial need, if applicable. • Applicant adequately demonstrates collaboration with community and area it serves. 	0-15
Financial Management (5 available) Variable. <ul style="list-style-type: none"> • Financial documentation or other data uploaded demonstrates financial stability. • Description of policies and processes for internal controls is acceptable. 	0-5
Total Possible Points	60

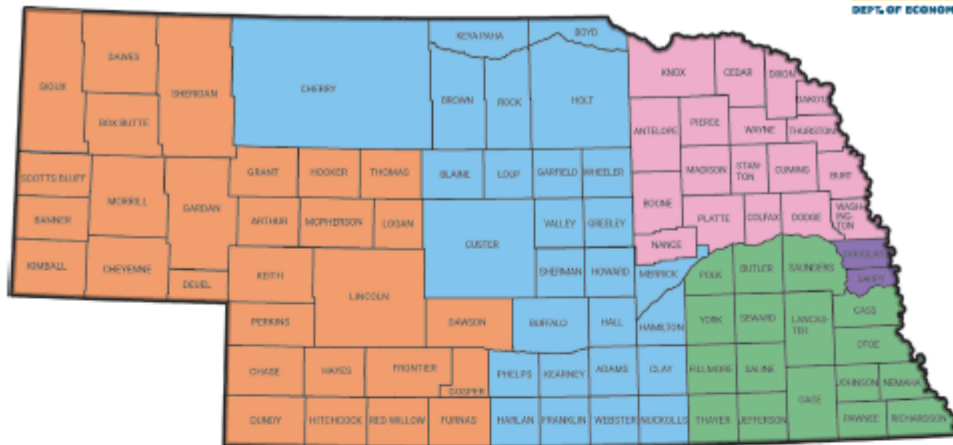
Attachment 2 – Congressional Districts Map

https://nebraskalegislature.gov/about/congress_map.php



Attachment 3 – NDED Housing Program Representative Map

Nebraska Department of Economic Development:
Housing Division



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Programs Administered by the Housing Division

- Community Development Block Grant (CDBG) – Housing
- HOME-American Rescue Plan (HOME-ARP)
- HOME Investment Partnerships Program (HOME)
- Middle Income Workforce Housing Investment Fund (MWHF)
- National Housing Trust Fund (HTF)
- Nebraska Affordable Housing Trust Fund (NAHTF)
- Pandemic Relief Housing Program (PRH)
- Rural Workforce Housing Fund (RWHF)
- Rural Workforce Housing Land Development Program (RWLD)

Attachment 4 – Public Comments

NAHTF QAP 2024 Public Comment

Melanie O'Brien <melanieowrites@gmail.com>

Sun 12/3/2023 11:12 AM

To:DED Public Comment <ded.publiccomment@nebraska.gov>

Cc:Pierce, Barb <Barb.Pierce@nebraska.gov>

Established, small but effective and fiscally sound housing development programs (such as Habitat for Humanity affiliates) are not competitive in scoring for NAHTF grants because they lack the scale and capacity of large developers. In rural communities, however, they consistently make a difference in affordable housing year after year and target homebuyers/renters in the very lowest AMI categories.

I would like to see a segment of NAHTF grants for such organizations that is crafted to be financially smaller and simplified so that the administration for DED is very manageable and high-level capacity is not required. Just like Technical Assistance, it could be a separate category for those serving 60-80% AMI and a flat fee of perhaps \$25K per house for basic development costs such as the foundation, framing lumber, and doors/windows.

Thank you.



HOPPE

DEVELOPMENT

January 4, 2024

To: ded.publiccomment@nebraska.gov

Nebraska Department of Economic Development (DED)

Nebraska Affordable Housing Trust Fund (NAHTF) Administrator

Please see below for Hoppe Development public comments concerning the Proposed 2024 Nebraska Affordable Housing Trust Fund Qualified Action Plan (QAP).

Application Guidelines and AmpliFund

We would encourage the Department to post draft Application Guidelines at same time as draft QAP to allow full understanding of application cycle requirements or changes.

Eligible Applicants:

The QAP currently states that “For-profit entities working in conjunction with an eligible applicant organization are eligible to receive benefit of the NAHTF funds as a partner in the project but will not be acting as a sub-recipient. The eligible applicant organization must be the applicant for the NAHTF funds and shall be the entity that enters into the DED contract and responsible for the project requirements, goals, and compliance through the affordability period.”

This language creates challenges in public-private collaborations between a nonprofit and a for-profit entity. We encourage the Department to consider allowing the for-profit partner expenses, when expended as a partner in the project, to be considered eligible expenses for reimbursement, whether reimbursed to the nonprofit or to the for-profit partner directly. These public-private partnerships should be more celebrated and recognized as a benefit for communities. Many eligible applicants are not familiar with complexities of real estate development and NAHTF project requirements. Allowing for-profit entities to be named as partner in NAHTF contract would allow easier and more efficient implementation of project and capacity building of said eligible applicants. By allowing a for-profit entity to use their construction financing and equity or match funding would eliminate unnecessary burdens of additional fees, costs, and time of project implementation. The end result of affordable housing for beneficiaries under 120% should not require additional red-tape for public-private partnerships.

Attachment 1 – Threshold and Scoring Table

We commend the Department for a more balanced objective/subjective point system for Housing Development Applications, but QAP fails to provide clarity regarding specific points possible. Without an understanding of the specific “Objective, Subjective, and Pro-Forma,” points possible, sufficient public

comment cannot be provided at this time. We would encourage the Department to publish specific points possible table and provide an additional 10-day comment period to address any unknown issues, concerns, suggestions for improvement, and/or positive comments.

Evan Clark



Development Associate | Hoppe Development
evan@hoppeddevelopment.com



Affordable Housing Builds Strong Communities

January 4, 2024

From: Carol Bodeen, Director of Policy & Outreach

To: ded.publiccomment@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 2024 Nebraska Affordable Housing Trust Fund Qualified Action Plan (QAP).

Public Comment Process

NHDA continues to commend DED for conducting and being responsive to the 2024 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 2024 NAHTF program year allocation for NAHTF-eligible activities and State Administration costs. It was noted that the amount estimated for State Administration has remained at \$1,250,000 following its almost 50% increase last year. It is hoped that State Administration costs are allocated to support higher wages for staff members and to ensure sufficient staffing for the efficient administration of the NAHTF.

Funding Cycles and Limitations

NHDA is pleased to see that the maximum NAHTF award amount has remained at \$750,000 in project costs (excluding General Administration, Housing Management and Lead-Based Paint Testing). With the higher costs associated with construction showing no downward trend, this is a good decision to maintain the \$750,000 maximum.

NHDA is supportive of the increase in the number of Technical Assistance grants to two per congressional district and the maximum award amount increase to \$50,000. Increasing operational capacity is a good investment in improving the ability of eligible applicants to produce and improve affordable housing in Nebraska.

NHDA makes the following comments related to “soft costs” associated with the production of affordable housing development:

- NHDA 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 and appreciates that DED is allowing the opportunity for those Homebuyer Assistance projects with minor Rehabilitation request up to \$5,000 per assisted unit with the appropriate documentation. We ask that DED consider removing the cap of \$75,000 on all these projects.
- NHDA understands 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.

Application Process Summary

NHDA appreciates the opportunities provided by DED for applicants in the form of the pre-recorded workshops and open office hours. However, we do feel that offering “in-person” or “Zoom” type learning opportunities would be very helpful.

Application Guidelines and AmpliFund

NHDA strongly recommends that DED add a date for “Award Notices” to the 2024 NAHTF Anticipated Timeline. Our suggestion would be to institute a timeline that is approximately 90 days from the application due date. It is difficult for potential grantees to be prepared for site acquisitions, project costs, communication with contractors, suppliers etc. with no anticipated date of notification if the project can move forward.

Matching Requirements

NHDA suggests that the title of this section be changed from “Matching Requirements” to “Matching Funds”. This would reduce confusion since there is no match requirement for NAHTF applications.

Selection Criteria and Process

NHDA appreciates DED’s decision to increase the amount of funding for Technical Assistance. We continue to encourage the simplification of both the application process and reporting processes for these awards.

Milestones Requirement

NHDA suggests that DED continue to review the Milestones threshold requirement for previous awards and drawn funds to ensure that these requirements are an appropriate incentive to push organizations to utilize their grant funds in a timely manner. Every project is different and therefore would have different types of “milestones”. This Milestones Requirement seems to more realistically discourage applications from organizations who are currently planning ahead and seeking funding for their next development. As a group, we cannot be supportive of any strategy that discourages proposals and minimizes the number of applications. We urge DED to convene a focus group of long-term NAHTF grantees to brainstorm a better method to accomplish the appropriate timeliness of drawing funds for the various types of projects.

Attachment 1 – Threshold and Scoring Table

We commend DED for a more balanced objective/subjective point system for Housing Development Applications, but by its nature, the QAP does not provide specific details on all points possible. We would encourage DED to publish a draft copy of the actual application guidelines prior to the official opening of the 2024 NATHF Funding Cycle. An additional 10-day comment period could then be provided to address any unknown issues, concerns, suggestions for improvement, and/or positive comments.

Conclusion

DED's openness to suggestions for improvements and changes is apparent in this year's process and draft product. We anticipate the publication of an updated NAHTF Manual within the next year. We urge DED to conduct training sessions in conjunction with the introduction of this Manual. It has been many years since training of this type has been held and the advent of a new NAHTF Manual would be a very good time to offer them again. There are many new organizations and staff members throughout the state that would benefit greatly, and it would contribute to the overall efficient operation of the NAHTF program. In conclusion, NHDA is appreciative of the hard work of the Department and looks forward to the continuing positive relationship between our organizations in 2024.

Thank you,

Carol Bodeen

Director of Policy & Outreach



JANUARY 4, 2024

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 2024 NAHTF QAP

Partners and Colleagues:

Thank you for this opportunity to provide commentary on the 2024 Qualified Allocation Plan (QAP) for the Nebraska Affordable Housing Trust Fund (NAHTF). The transparency of the QAP administrative review process is a commendable and affirms the willingness of Department Leadership to be responsive to the evolving needs of the state. We further enjoyed participating in the facilitated stakeholder focus groups and were impressed with the cross section of your professional team that was present and engaged.

NeighborWorks Lincoln is proud to be a regular recipient (and reliable implementer) of Trust Fund grant support and provides the following feedback based on this experience.

Nonprofit Technical Assistance | Support

We applaud the state for raising the level of support and expansion to six grantees. Focus should now turn to streamlining the application, if this is not already being taken on. A simpler application will ease the burden on emerging organizations exploring their role(s) in affordable housing and allow their precious time to be focused instead on the capacity building the program is designed to facilitate.

Milestone Thresholds | Revision Sought (Priority)

This continues to be a top priority. While a noble attempt to coax performance, the Milestones are impractical and counterproductive in their rigidity and force grantees to go to extraordinary and often unnecessary lengths to maintain their eligibility for current cycle funding. Every real estate development is different; some will be ready to roll immediately upon contract execution while others will need time to marinate (design development, construction documentation, capital stack, entitlements, platting, etc.). The 50% drawn requirement—on grants that may have been finalized as recently as twelve months prior to the time of application—is discouraging to reliable partners. We understand the necessity of performance requirements, though, and offer the following (revised) thresholds:

2020 - 100% of funds drawn

2021 - 25% of funds drawn

2022 - release of funds and demonstrated progress via reporting

2023 - executed contract

Alternatively, the review process could prioritize projects that are shovel ready and eliminate the threshold requirements altogether—perhaps tying awards to shorter performance contracts instead.

Decision-Making Timeline | Revision Sought

We request that the department commit to a 90-day grant-making decision. Recent changes to the program have ostensibly shifted funding priority to projects that are significantly advanced at the time of application, including site acquisition and review (and departmental approval), design development, detailed construction budgets, etc. These expenses are obviously incurred before application is made and amount to a considerable outlay of time and capital that leaves NAHTF participants increasingly at risk. A reliable and compact review period would demonstrate that the department understands the incurrence of risk and holding costs by applicants. This would also help us more accurately budget these expenses and gird against the risks inherent in unsuccessful application(s) and project discontinuation.

Draw Requirements | Comment

While not explicitly part of the QAP, the recent trend of adding quarterly draw requirements to award contracts is similarly problematic to milestone thresholds. If draw requests are a performance metric that the State plans to utilize going forward, grantees will need the ability to more easily amend contract budgets OR submit \$0 draw requests that document project-related expenses (and staff time) not funded by the grant. Alternatively, the contract format could be revised to omit specific grant budgets altogether in favor of enumerated eligible expenses; this would save the hassle of formally revising budgets while giving grantees the flexibility to spend down their state money (plus match) earlier in the project life cycle.

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-defined housing programs. Please contact me directly (402.477.7181 x202) if I can provide additional clarity or detail.



Wayne A. Mortensen, AIA
Chief Executive Officer

Cc: Leslie Coleman, Chief Operations Officer
Amy Kiezler, Southeast Housing Program Representative
Carol Bodeen, NHDA
Board of Directors



January 3, 2024

Nebraska Department of Economic Development
301 Centennial Mall South
PO Box 94666
Lincoln, NE 68509-4666

RE: 2024 Proposed NAHTF QAP Public Comments

Nebraska Department of Economic Development:

On behalf of the Board of Directors and Staff of NeighborWorks Northeast Nebraska we are providing written comments on the Proposed 2024 NAHTF QAP.

Funding Cycles and Limitations (Page 5)

Second paragraph:

We support the department establishing maximum amount to be \$750,000 in project/hard costs (excludes General Administration and Housing Management).

Fourth paragraph:

We support the Nonprofit Technical Assistance awards set at \$50,000 over a two-year period.

Developer Fee (Page 6)

It is customary to have a developer fee allowance based on the percentage of the cost to develop the property. NeighborWorks Northeast Nebraska recommends a developer fee allowance cap of 15% of total per unit cost.

2022 NAHTF Anticipated Timeline Chart (Page 8)

As a current Commissioner of NCHH, Roger Nadrchal appreciated the department providing the Proposed 2024 QAP prior to the Public Comment period.

Matching Requirements (Page 9)

We appreciate the process to draw down the funds when matching funds are included in the NAHTF Housing Project; “all cash match must be incurred and expended during the contract period proportionate to the NAHTF costs.”

A concern related to scoring is the fact that although the application states that the match is not required, it accounts for 50 points of the application. This means that an applicant who is eligible to apply but lacks the match could have a margin of error of 56 to 74 points as experienced in the 2023 cycle. This raises questions about the fairness and consistency of the scoring process.

Selection Criteria and Process (Page 10)

First paragraph

First and foremost, we are concerned about the scoring of the application. The application specifies that the points threshold for fundability is set at 300 points. However, it seems that the application's total possible points are inaccurately stated as 455. This discrepancy arises from the consideration of hybrid projects involving both new construction and rehabilitation. To our knowledge, applicants can only apply for one or the other in the application, not both (we are not sure). Therefore, in a new construction project, the maximum achievable points are 405, whereas in a rehabilitation project, they are 425. Consequently, applicants in new construction projects can afford to lose up to 106 points, and those in rehabilitation projects can lose up to 126 points (which is somewhat unachievable therefore, impractical due to the challenge of securing all available points). This leaves a very narrow margin for error, making it a challenging target to meet the threshold. This issue can be addressed through two methods: first, by lowering the fundability threshold to 200 points, which increases the margin for error, and second, by removing the distinctions between categories (such as new construction and rehabilitation), thereby giving all applicants an equal chance to attain the maximum points.

Furthermore, we would like to address the disparities in scoring between new construction and rehabilitation projects. While it's true that rehabilitation projects can potentially earn more points, the expectations seem unrealistic for rural organizations. The application employs a 1 to 1 unit of measurement for rehabilitation, meaning that an organization would need to rehabilitate 50 units to receive 50 points. In contrast, new construction operates on a 2 to 1 point system, allowing an organization to earn all 30 points by building 15 units. This discrepancy is particularly challenging for rural areas and appears to favor larger cities.

Our second concern relates to the apparent preference for big cities over rural areas. In our area (CD1), for instance, there were 7 awards in 2023, of which 5 went to large cities. The majority of the awards ended up in the City of Lincoln and the City of Omaha, with the exception going to the village of Beaver Crossing (which received a fraction of the award) and arguably the City of Milford (which is really close to Lincoln). The City of Bellevue is essentially considered part of Omaha for practical purposes. We fear that this scoring system may perpetuate a bias in favor of big cities like Omaha, Lincoln, and their surrounding areas.

Lastly, we believe that the department and those responsible for rating the applications may not fully grasp the challenges associated with developing housing in rural areas. For example, creating 20 affordable units in Columbus and Norfolk is considerably more challenging than developing the same number of units in Bellevue (Omaha). Additionally, the impact of 20 units in Columbus and Norfolk, with a combined population of 50,000, is much greater per capita than the impact in a city like Bellevue (Omaha), which has a population of over a million. This discrepancy highlights the unique challenges faced by smaller rural communities.

Third paragraph:

The QAP states that the NAHTF applications will be reviewed and competitively scored using both objective and subjective scoring criteria. We believe the scoring should be based on facts in the application and the capacity of the applicant rather than scorers using their own subjective scoring criteria preferences.

Fourth paragraph

The Legislation’s First Priorities lists as its first priority to be to “Serve the lowest income occupants”. This would indicate to us that a Purchase/Rehab/Resell Program would be more attractive to the legislation versus New Construction Programs. A PRR Program provides housing at a lower cost of development and less subsidy to make housing units affordable rather than the high cost of New Construction Programs. The scoring does not reflect this.

Milestones Requirement (Page 11)

We appreciate the Department considering NAHTF outstanding awards only. There is a huge difference between the various funding sources and the type of housing projects they support; NAHTF, CDBG, HOME, and/or HTF, therefore, each funding source should have its own milestones established pertinent to that source, not co-mingle them.

Milestones for open NAHTF awards relative to New Construction Subdivision Development should have a different milestone. Especially in this economy, it takes much longer to plan and get subdivision developments complete and ready for construction versus other housing programs

Closing Comments

The team at NeighborWorks Northeast Nebraska, comprising both the Board of Directors and Staff, strongly urges NDED to give serious consideration to these proposals. Ignoring these suggestions could result in undesirable outcomes, such as applicants proposing projects that align more with the application criteria than with the unique needs of their communities. Additionally, it's vital to remember that while new construction might be the current focus and perceived need, rehabilitation programs form the cornerstone of housing. They play a crucial role in preventing the deterioration of existing housing stock, thus ensuring a stable supply of homes in the market.

Sincerely,
NeighborWorks Northeast Nebraska



Roger D. Nadrchal, CEO

Board of Directors

Mitchell Schultze, President
Rick Chochon, Vice President
Dan Poppe, Treasurer
Sandy Wolfe, Secretary

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Nebraska Department of Economic Development
245 Fallbrook Blvd. Ste. 002
Lincoln, NE 68521

January 3, 2024

In Response to the 2024 NAHTF Qualified Action Plan:

The Southeast Nebraska Development District (SEND D) thanks the Department for the opportunity to provide comments on the proposed 2024 NAHTF Qualified Action Plan (QAP). Residents in our 16-county service area have benefitted tremendously from the various opportunities offered through the Nebraska Affordable Housing Trust Fund (NAHTF). As our housing staff continue to expand their knowledge of the program by overseeing the implementation of 13 ongoing grants, we want to acknowledge our appreciation of the Department's trust in SEND D and its willingness to consider our comments, which are based on extensive experience operating these programs at the "ground level." This year, our comments are submitted with the goal of further ensuring an impactful, statewide deployment of the annual NAHTF budget.

SEND D is part of the Nebraska Regional Officials Council (NROC), which is comprised of the state's eight Development Districts. Representatives of NROC meet monthly, often discussing regional housing issues and sharing information on applicable grant programs/opportunities that could help address these needs. Based on these conversations and the significant statewide need for affordable housing assistance, SEND D respectfully requests that the Department consider allocating a certain percentage of its annual NAHTF budget to the Development Districts to be disbursed for eligible projects.

In the proposed scenario, the Districts would work with the Department to create an official action plan for the allocation of the funds. Not only would this create a direct partnership between the Department and the Development Districts, but it will also take advantage of the Districts' intimate knowledge of statewide housing deficiencies by targeting the most needy areas for NAHTF assistance. The Districts truly are an olive branch to reaching the most needy households/communities, as dedicated staff members routinely engage in local conversations aimed at finding solutions to these problems. Each District's Board of Directors supports this

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SEND D is an Equal Opportunity Provider and Employer



proposal; these boards are comprised of members who constantly engage in local conversations that always express a profound need for various forms of housing assistance.

Additionally, this proposed partnership would also alleviate some of the Department's administrative workload, as it will reduce the overall amount of NAHTF applications that must be reviewed/awarded. We can create an efficient, streamlined administrative process that will benefit both the Department and the Development Districts.

The Districts have already proven their ability to deliver statewide affordable housing assistance, as evidenced by the coordinated effort to provide \$1.24 million in Cares Act funding to low-to-moderate income tenants and their landlords via the 2020 Landlord Assistance Program (LAP), which was granted by the Nebraska Department of Health and Human Services (DHHS). The program was designed by the Southeast Nebraska Affordable Housing Council (SENAHC) and SENDD to include an ambitious statewide disbursement of the funds in partnership with Nebraska Regional Officials Council (NROC). Nebraska DHHS's trust in SENAHC and NROC proved fruitful, as the LAP successfully funded over 250 applications within the brief four-month contract period. More information about the LAP and its collaborative rollout is available upon request.

The Development Districts have a strong working relationship and are dedicated to finding solutions to improve housing conditions across Nebraska. SENDD believes strongly in this proposal and will facilitate further conversations between NROC and the Department as needed.

Thank you for considering our comments regarding a proposed allocation of a portion of the annual NAHTF budget to be solely disbursed by the Development Districts on eligible projects. Please feel free to reach out with any questions.

Sincerely,

Tom Bliss
SENDD, Executive Director

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SENDD is an Equal Opportunity Provider and Employer

From: [Steven Shadle](#)
To: [DED Public Comment](#)
Subject: 2024 NAHTF QAP Public Comment
Date: Monday, January 1, 2024 8:14:13 PM

The other day I was driving through Elkhorn and saw a number of older small houses. Houses much like older [homes in South Sioux City.](#)

No one is building small homes. The starter homes in South Sioux City are \$300,000!
While an endless supply of apartments continue to be built.

Small affordable homes need to be built.

A small home certainly has more room than an apartment and gives the homeowner a chance.

My first home was small and I was able to gain equity and eventually move to a larger home.

Steve Shadle
South Sioux City
Sent from my iPhone